

EFFICIENCY ASSESSMENT FOR THE



NEVADA
Department of
Education



MAY 2025 – FINAL REPORT

**PRODUCED BY
PUBLIC WORKS LLC**



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EXECUTIVE SUMMARY

OVERVIEW OF THE EFFICIENCY ASSESSMENT

The State of Nevada Purchasing Division, on behalf of the Department of Education, Student Achievement Division released **RFP # 30DOE-S2805** on April 14, 2024, for a qualified vendor to provide an Efficiency Assessment of the Nevada Department of Education (NDE). On August 13, 2024, the Nevada State Board of Education approved the contract for Public Works LLC to perform the assessment.

ACKNOWLEDGEMENTS

The NDE State Superintendent and Leadership Team requested the efficiency assessment. This decision reflects a forward-thinking, transparent approach to leadership, one that prioritizes not only the current needs of Nevada’s education system, but also the long-term effectiveness and sustainability of the organization.

In any complex institution, especially one as pivotal as the Department of Education, maintaining optimal efficiency is essential for delivering quality services to students, educators, and communities. By commissioning this external assessment, NDE leadership is ensuring that the organization will benefit from an unbiased, objective perspective that identifies both strengths and areas for improvement. This outside look is critical because it brings fresh insights that might not always be evident from within, offering a clearer path toward enhanced performance and resource allocation.

The willingness to engage in such a reflective process is a mark of strong leadership. It demonstrates an understanding that continuous improvement is necessary to meet the ever-evolving challenges in education. It also exemplifies a commitment to fostering an environment where excellence is not only encouraged, but actively pursued.

We applaud the NDE Leadership Team’s decision and view this assessment as an important step toward building an even more efficient, effective, and accountable Department of Education—one that will better serve the students, teachers, and communities it supports.

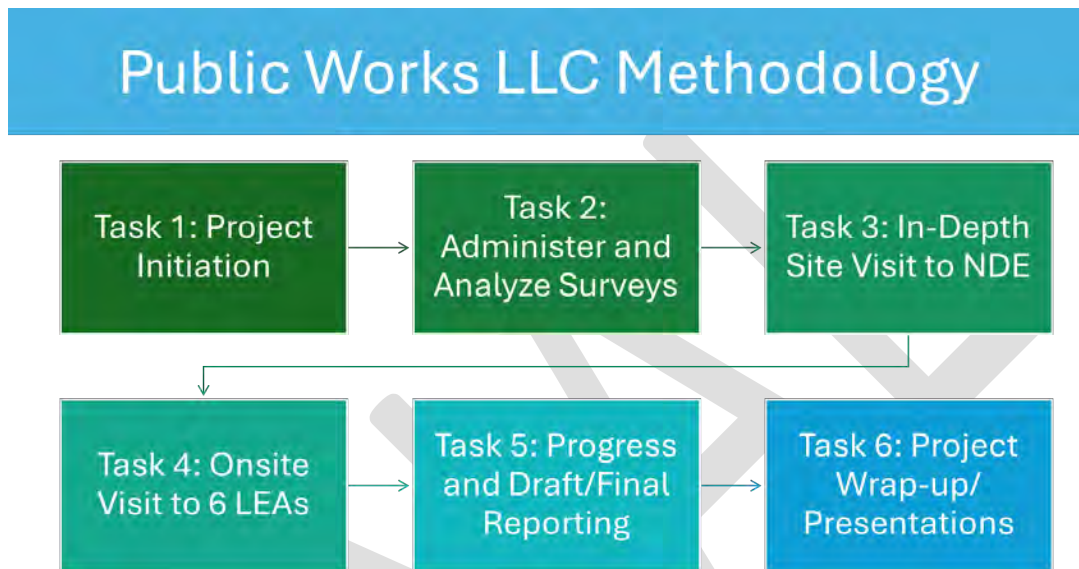
The authors would like to thank the NDE staff members and LEA (local education agency) superintendents and staff whom we interviewed and worked with during this study. In addition, we would like to thank the administration of the following state departments of education for their assistance during the peer comparative analysis portion of this study: Arkansas Department of Education (ADE), Kentucky Department of Education (KDE), Oregon Department of Education (ODE), Tennessee Department of Education (TDE), and Utah State Board of Education (UBE).

We would be remiss if we did not thank the Executive Director of the Nevada Association of School Superintendents who assisted in scheduling focus groups with the state’s superintendents and assisted our team in administering the LEA survey.

METHODOLOGY

Exhibit ES-1 shows the six key tasks Public Works LLC completed prior to finalizing the Efficiency Assessment report.

EXHIBIT ES-1
OVERVIEW OF PUBLIC WORKS LLC METHODOLOGY



Source: Public Works LLC, 2024.

In Task 1: Project Initiation

Our team conducted an internal kick-off virtual meeting on August 26, 2024, with the key NDE leadership and staff of the offices under review. We also submitted a data request list for each of the offices and worked with NDE to secure the dates of October 7-11, 2024, for onsite visits to both the Carson City and Las Vegas NDE offices.

In Task 2: Administer and Analyze Surveys

Our team administered surveys to both the LEA superintendents and key LEA leadership staff and surveyed all staff within NDE. The Nevada Association of School Superintendents (NASS) sent 168 survey invitations to all of the state's district superintendents and key staff in district central offices. The survey was launched on October 8, 2024, and remained open until October 21, 2024. The LEA survey response rate was 79 percent. On December 5, 2024, the NDE survey was launched and remained open for two weeks. The NDE staff survey response rate was 56 percent.

Also during Task 2, the Superintendent of Public Instruction assisted the Public Works LLC team in requesting peer data from five other state departments of education. The five state departments of education used for the comparison analysis included the Arkansas Department of Education (ADE), Kentucky Department of Education (KDE), Oregon Department of Education (ODE), Tennessee Department of Education (TDE), and Utah State Board of Education (UBE). **Appendix A** provides an analysis of peer state comparisons with the data acquired.

Task 3: In-Depth Site Visit to NDE

The Public Works LLC team conducted an onsite visit to both the Las Vegas and Carson City NDE offices during the week of October 7-11, 2024. The Public Works LLC team reviewed 11 of the 12 offices currently housed in the three divisions of NDE. Sections of this report include reviews of offices in each division, as follows:

Section 3: Student Achievement Division

Office of Teaching and Learning (OTL)
Office of Early Learning and Development (OELD)
Office of School and Student Support (OSSS)
Office of Assessment Data and Accountability (ADAM)
Office of Inclusive Education (OIE)

Section 4: Division of Educator Development and Family Engagement

Office of Educator Development, Licensure and Family Engagement (EDLiFE)
Office for a Safe and Respectful Learning Environment (OSRLE)
Office of Career Readiness, Adult Learning and Education Options (OCRALEO)

Section 5: Student Investment Division

Office of Fiscal Operations
Office of District Support Services
Office of Division Compliance

Section 6: Agencywide Information Technology/Data Systems Management

Overview & Current Organizational Structure of OIT
Budget
Organization
Current Study Findings & Recommendations
Additional Related Recommendations

The review team also conducted focus group sessions with NDE staff, district principals, teachers, and other selected staff groups. Findings and recommendations contained in this report were based on the corroboration of data from state and district documents and information received through surveys, interviews, and focus groups.

Task 4: Visits to Six LEAs

Two members of the Public Works team conducted onsite visits to the following Nevada school districts:

- Lincoln County School District: October 1, 2024
- Clark County School District- October 3 & 4, 2024
- Mineral County School District October 14, 2024
- Elko County School District- October 15, 2024
- White Pine County School District October 16, 2024

A mutually agreed upon date could not be established for the Washoe School District onsite visit and thus, virtual interviews were conducted on October 31, 2024.

Step 5: Progress and Draft/Final Reporting

Our team provided NDE with a monthly progress report as well as a Gantt chart displaying progress on each task. Also, several one-on-one update meetings were held with one of Public Works LLC's team members and the State Superintendent.

During this step, our team analyzed all data provided as well as interview and focus group notes, peer state data, and survey responses to produce a draft report. Our team also completed a salary and benefit analysis of all 17 Nevada school districts based on data available through their websites and a limited number of calls and emails to the LEA's HR departments.

A draft report was sent to NDE leadership and NDE office leads on February 14, 2025. Virtual tollgate meetings were held primarily on February 20-24, 2025, to discuss NDE staff's observations and feedback on the draft report. Public Works LLC also requested written feedback from NDE regarding any factual errors found and this feedback was scheduled to be sent to the Public Works LLC team on February 27, 2025. Any appropriate feedback from the tollgate meetings and written feedback was incorporated into the final report and delivered to NDE in April 2025.

Exhibit ES-2 shows the total number of commendations and recommendations in the report.

EXHIBIT ES-2
NDE EFFICIENCY ASSESSMENT RECOMMENDATIONS AND COMMENDATIONS

Section	Recommendations	Commendations
Section 1.0: Overall Reorganization Recommendation for the Three Divisions Under Study	7	0
Section 2.0: Additional Cross-Division Findings, Commendations, and Recommendations	4	2
Section 3.0: Student Achievement Division	20	13
Section 4.0: Division of Educator Effectiveness and Family Engagement	18	11
Section 5.0: Student Investment Division	9	8
Section 6.0: Office of Information Technology	6	5
Total	64	39

Source: Compiled by Public Works LLC, 2025.

Task 6: Project Wrap-Up/Presentations

Should NDE leadership determine they would like a final report presentation, the Public Works LLC team will provide it on a mutually agreed upon date.

Notable NDE Commendations

The assessment identified numerous areas of excellence across the Nevada Department of Education. The following commendations highlight exceptional performance and best practices that demonstrate NDE's commitment to educational excellence.

Technology and Data Management Excellence

The Office of Information Technology (OIT) has demonstrated remarkable effectiveness in maintaining data integrity and system operations. Despite limited resources, the small Database Systems Management team of four administrators and three developers successfully manages all aspects of NDE's core business data functions. The team has maintained high professional standards while handling a large inventory of enterprise data systems, showcasing efficiency and dedication to quality service delivery.

The Office for a Safe and Respectful Learning Environment (OSRLE) has exhibited exceptional performance in several areas:

- Successfully serves 781 schools while maintaining a positive, "can do" attitude
- Developed innovative toolkits and guides for improving student health and educational outcomes
- Demonstrates remarkable efficiency despite limited personnel resources

The Office of Early Learning and Development (OELD) has achieved significant successes:

- Secured the federal Preschool Development Grant (PDG B-5) for FY24 and FY25
- Oversight over \$140 million covering two years for the Early Childhood Innovative Literacy Program
- Established itself as a key voice in universal Pre-K initiatives and early childhood education
- Successfully promotes systems alignment across educational programs

Several offices have demonstrated exceptional collaborative efforts:

- The Office of Teaching and Learning, in coordination with the Office of Inclusive Education, developed a comprehensive Dyslexia resource guide that has become valuable for LEAs, educators, and families
- The Office of Inclusive Education has fostered strong partnerships to increase their service capacity despite staffing constraints
- Cross-divisional collaboration has resulted in improved processes and enhanced efficiency

Staff across multiple divisions demonstrate outstanding professional qualities:

- The Educator Licensure team shows remarkable dedication and teamwork, particularly during peak periods
- The Audit Unit maintains excellent organization, workflow, and standardized processes
- The Adult Education Unit exhibits strong team spirit and customer service focus
- The Office of Division Compliance effectively manages critical oversight responsibilities

Several units have made significant strides in improving operational efficiency:

- The Contracts section has modernized file management and developed improved tracking systems
- The Grants Management Unit has established effective processes for subrecipient engagement

- Multiple offices have contributed to developing comprehensive internal control and documentation standards

Notable achievements in stakeholder relations include:

- Strong commitment to meaningful engagement with educational partners
- Successful implementation of the Portrait of a Learner initiative with broad community support
- Development of strong partnerships to enhance service delivery

These commendations reflect NDE's commitment to excellence across multiple operational areas. The demonstrated achievements provide a strong foundation for future growth and improvement, while highlighting best practices that can be replicated across the department. The dedication and innovation shown by NDE staff, despite resource constraints, underscore the department's potential for continued enhancement of educational services for Nevada's students.

A Strategic Opportunity for NDE Growth and Improvement

The Nevada Department of Education stands at a pivotal moment, with an opportunity to enhance its efficiency, strengthen its workforce, and improve service delivery to students, educators, and districts. This assessment identifies key areas where NDE can make strategic improvements, streamline processes, and enhance productivity, ultimately leading to stronger educational outcomes for students across the state. By addressing these challenges with a growth-oriented mindset, NDE leadership can build a more resilient and effective organization that better serves its stakeholders.

One of the most significant opportunities for improvement lies in **staffing and resource allocation**. Compared to peer state education agencies, NDE operates with far fewer personnel, leading to excessive workloads and reduced capacity for oversight, technical assistance, and policy execution. With 197 full-time employees (at the time of the writing of this report) supporting a student population of 484,192, NDE has the highest student-to-staff ratio among its peers, with 2,458 students per staff member. In contrast, states like Oregon and Tennessee maintain significantly lower ratios, allowing for greater direct support to schools and districts. Addressing this staffing gap presents a tremendous opportunity to enhance service delivery, reduce employee burnout, and improve overall operational effectiveness. A phased, six-year staffing plan can help bring NDE closer to parity with peer states while prioritizing key roles in compliance, grant administration, data management, and educator support.

Another area where NDE can strengthen its operations is **compensation and workforce stability**. Competitive salaries are essential for attracting and retaining top talent, yet NDE salaries lag behind those offered in some Nevada school districts. This creates recruitment challenges and contributes to high turnover, particularly in leadership positions. Ensuring that NDE remains competitive in the job market is an investment in the department's long-term success. By conducting a salary benchmarking study and advocating for legislative adjustments, NDE can position itself as a desirable workplace while reducing the disruptions caused by staff departures. Additionally, expanding professional development opportunities and implementing retention incentives, such as tuition reimbursement and leadership training programs, can foster a more engaged and committed workforce.

Employee retention and workplace flexibility also present areas where NDE can innovate and improve. A common theme across staff feedback is the desire for more flexibility in work arrangements. The removal of remote work options and limited access to flex time have made it challenging for NDE to retain staff who are aligned to the vision and mission of NDE and who seek a better work-life balance.

Many public agencies and businesses have recognized that workplace flexibility contributes to higher job satisfaction and productivity. NDE has an opportunity to lead in this area by conducting a Work-Life Balance Study, piloting hybrid work models, and introducing flex scheduling where possible. These initiatives can help reduce turnover, increase employee morale, and improve recruitment efforts without compromising operational efficiency.

Beyond internal workforce improvements, **strengthening collaboration and communication** within NDE and between NDE and LEAs represents another key area for growth. A more structured approach to internal and external communication can foster stronger relationships with districts, ensuring that directives are clear, consistent, and actionable. Creating formal cross-division working groups, improving communication channels, and establishing a structured feedback loop with LEAs will enhance transparency and coordination across the education system.

While NDE has taken a positive approach to **streamline its grant management and funding processes**, additional interdepartmental coordination is needed to improve efficiency and reduce administrative burdens on school districts. Currently, grant administration is fragmented across multiple offices, leading to delays and conflicting guidance. By centralizing grant oversight under a dedicated office with clear accountability, NDE can simplify processes for school districts while ensuring compliance and timely distribution of funds. Additional training for grant management staff and the implementation of standardized communication protocols can further enhance the effectiveness of this critical function.

Finally, **modernizing the Office of Information Technology (OIT)** presents a strategic opportunity to improve digital infrastructure, data management, and cybersecurity. Currently, OIT is positioned within the Student Achievement Division, limiting its ability to function as a strategic asset. Elevating OIT to report directly to the State Superintendent by establishing a Chief Information Systems Officer (CISO) role would ensure stronger oversight and alignment with NDE's broader operational goals. Investing in improved data governance, cybersecurity protocols, and digital tools can enhance efficiency and provide valuable insights for decision-making.

A Path Forward: Turning Challenges into Opportunities

NDE has the opportunity to transform these challenges into actionable improvements that will strengthen the organization and improve educational outcomes across Nevada. The findings and recommendations in this report are offered as **a roadmap for strategic growth and operational excellence**. By making targeted investments in staffing, compensation, workplace flexibility, communication, grant management, and IT modernization, NDE can build a more agile, efficient, and supportive education system.

Some of the recommendations will require approval from the Governor's Office and the Nevada Legislature, e.g., additional staff, increased salaries and more flexible work policies. To move forward, NDE leadership will need to work closely with these other entities. NDE leadership can and should take immediate steps to:

- **Develop a six-year staffing plan** to align employee ratios with peer states.
- **Conduct a salary benchmarking study** to advocate for competitive compensation.
- **Reintroduce flexible work policies** to improve retention and morale.
- **Strengthen internal and external communication** to enhance collaboration with LEAs.

- **Centralize grant oversight** to streamline funding processes.
- **Elevate IT governance** by creating a **CISO role** for strategic oversight.

By embracing these opportunities, NDE can position itself for long-term success, ensuring that Nevada's students, educators, and communities receive the highest level of support. This is not just about solving immediate challenges—it is about **creating a stronger, more effective education system for the future**.

OVERALL FISCAL IMPACT

Exhibit ES-3 shows the total cost and savings of each recommendation that resulted in a fiscal impact for NDE. The overall total is the potential fiscal impact should NDE implement **all** the report's recommendations. As shown, should NDE implement all recommendations, the total **cost** over the next five years would be **\$14,641,425.50**, in addition to **\$80,000.00** in one-time costs.

Implementation of **Recommendations 3-2** and **3-5** would result in a potential range of savings of \$3,645,200.00 to \$7,508,800.00. For the purposes of this exhibit, the maximum savings for each recommendation have been represented.

EXHIBIT ES 3
FISCAL IMPACT OF PUBLIC WORKS LLC RECOMMENDATIONS

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30	Five Year Total	One-Time Cost
Section 1.0: Overall Reorganization Recommendation for the Three Divisions Under Study							
Rec 1-4 & 1-5: Reorganize NDE and hire Deputy Administrator, Human Resource Liaison, Policy Administrator, and Chief Information Systems Officer	(\$573,282.00)	(\$573,282.00)	(\$573,282.00)	(\$573,282.00)	(\$573,282.00)	(\$2,866,410.00)	
Total Section 1.0	(\$573,282.00)	(\$573,282.00)	(\$573,282.00)	(\$573,282.00)	(\$573,282.00)	(\$2,866,410.00)	
Section 3.0: Student Achievement Division							
Rec 3-1: Add seven FTEs to OTL to assist in providing quality services to LEAs	(\$896,893.50)	(\$896,893.50)	(\$896,893.50)	(\$896,893.50)	(\$896,893.50)	(\$4,484,467.50)	
Rec 3-2: Eliminate contracting positions in OTL for work which should be completed by internal NDE staff	\$553,280.00	\$553,280.00	\$553,280.00	\$553,280.00	\$553,280.00	\$2,766,400.00	
Rec 3-5: Eliminate contracting positions in OSSS for work which should be completed by internal NDE staff	\$948,480.00	\$948,480.00	\$948,480.00	\$948,480.00	\$948,480.00	\$4,742,400.00	
Rec 3-11: In ADAM establish one robust statewide system of accountability	(\$40,000.00)	(\$40,000.00)	(\$40,000.00)	(\$40,000.00)	(\$40,000.00)	(\$200,000.00)	
Rec 3-14A: Create an Admin Support unit with two new AA IIs	(\$133,614.00)	(\$133,614.00)	(\$133,614.00)	(\$133,614.00)	(\$133,614.00)	(\$668,070.00)	

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30	Five Year Total	One-Time Cost
Rec 3-14B: Create a Dispute Resolution Unit in OIE and hire one EPP to oversee/manage it	(\$127,259.00)	(\$127,259.00)	(\$127,259.00)	(\$127,259.00)	(\$127,259.00)	(\$636,295.00)	
Rec 3-14C: Create a Resource Management Unit in OIE with one EPP and a Program Officer to operate it	(\$225,335.00)	(\$225,335.00)	(\$225,335.00)	(\$225,335.00)	(\$225,335.00)	(\$1,126,675.00)	
Rec 3-14D: Expand capacity of Indian Education now, and create a separate Indian Education Office within the Student Achievement Division in 3 years	(\$130,352.00)	(\$130,352.00)	(\$130,352.00)	(\$130,352.00)	(\$130,352.00)	(\$651,760.00)	
Rec 3-14E: Create a Monitoring Unit in OIE with one EPP and one Program Officer	(\$225,335.00)	(\$225,335.00)	(\$225,335.00)	(\$225,335.00)	(\$225,335.00)	(\$1,126,675.00)	
Rec 3-15: Increase OIE's in-person engagement with external stakeholders	(\$10,000.00)	(\$10,000.00)	(\$10,000.00)	(\$10,000.00)	(\$10,000.00)	(\$50,000.00)	
Rec 3-16: Increase OIE's in-person engagement with offices	(\$12,000.00)	(\$12,000.00)	(\$12,000.00)	(\$12,000.00)	(\$12,000.00)	(\$60,000.00)	
Total Section 3.0	(\$299,028.50)	(\$299,028.50)	(\$299,028.50)	(\$299,028.50)	(\$299,028.50)	(\$1,495,142.50)	
Section 4.0: Division of Educator Effectiveness and Family Engagement							
Rec 4-1: Hire an Educator Licensure Manager	(\$105,813.00)	(\$105,813.00)	(\$105,813.00)	(\$105,813.00)	(\$105,813.00)	(\$529,065.00)	
Rec 4-2: In the Office of Educator Licensure, implement a holistic approach to increase	(\$48,000.00)	(\$48,000.00)	(\$48,000.00)	(\$48,000.00)	(\$48,000.00)	(\$240,000.00)	

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30	Five Year Total	One-Time Cost
capacity in peak months and shift application volume to other months							
Rec 4-3: In the Office of Educator Licensure contract with UX consultant for audit of educator experience	\$0	\$0	\$0	\$0	\$0	\$0	(\$10,000.00)
Rec 4-8: Secure funding for an additional position in the Office of Educator Licensure to carry out Council recommendations	(\$138,681.00)	(\$138,681.00)	(\$138,681.00)	(\$138,681.00)	(\$138,681.00)	(\$693,405.00)	
Rec 4-10: Hire six positions to support the OSRLE	(\$713,956.00)	(\$713,956.00)	(\$713,956.00)	(\$713,956.00)	(\$713,956.00)	(\$3,569,780.00)	
Total Section 4.0	(\$1,006,450.00)	(\$1,006,450.00)	(\$1,006,450.00)	(\$1,006,450.00)	(\$1,006,450.00)	(\$5,032,250.00)	(\$10,000.00)
Section 5.0: Student Investment Division							
Rec 5-3: Contract for third-party facilitation of staff in the Office of Fiscal Operations to create a policy and procedures manual	\$0	\$0	\$0	\$0	\$0	\$0	(\$50,000.00)
Rec 5-4: Conduct a comprehensive review of Fiscal Operations processes	\$0	\$0	\$0	\$0	\$0	\$0	(\$20,000.00)
Rec 5-9: Create an Internal Audit section within SID	(\$410,833.00)	(\$410,833.00)	(\$410,833.00)	(\$410,833.00)	(\$410,833.00)	(\$2,054,165.00)	
Total Section 5.0	(\$410,833.00)	(\$410,833.00)	(\$410,833.00)	(\$410,833.00)	(\$410,833.00)	(\$2,054,165.00)	(\$70,000.00)

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30	Five Year Total	One-Time Cost
Section 6.0: Office of Information Technology							
Rec 6-1: Create a Chief Information Systems Officer (CISO) position	Cost included in Section 1.0	Cost included in Section 1.0	Cost included in Section 1.0	Cost included in Section 1.0	Cost included in Section 1.0	Cost included in Section 1.0	
Rec 6-2: Procure and implement a modern statewide data management system (DMS) to provide robust and intelligent reporting on return on investment (ROI) measures	(\$633,883)	(\$641,560)	(\$549,391)	(\$100,000)	\$0	(\$1,924,834)	
Rec 6-4: With new OIT staff, create an NDE-specific technology action plan to supplement the Statewide IT Strategy for FY23 – FY27	(\$115,053.00)	(\$117,354.00)	(\$119,701.00)	(\$122,095.00)	(\$124,537.00)	(\$598,740.00)	
Rec 6-6: With new OIT staff, begin the re-solicitation process for a statewide student information system midway through the DMS project	(\$128,724.00)	(\$131,298.00)	(\$133,924.00)	(\$136,603.00)	(\$139,335.00)	(\$669,884.00)	
Total Section 6.0	(\$1,077,660.00)	(\$1,090,212.00)	(\$1,003,016.00)	(\$458,698.00)	(\$263,872.00)	(\$3,193,458.00)	
Total (Cost) / Savings of Recommendations	(\$3,367,253.50)	(\$3,379,805.50)	(\$3,292,609.50)	(\$2,748,291.50)	(\$2,553,465.50)	(\$14,641,425.50)	(\$80,000.00)

SECTION 1.0: OVERALL REORGANIZATION RECOMMENDATION FOR THE THREE DIVISIONS UNDER STUDY

INTRODUCTION

Public Works LLC's findings for the overall reorganization of Nevada Department of Education (NDE) are found in **Section 1** of this document. In this section, we cover findings and recommendations related to the reorganization of NDE. Additional findings, commendations, and recommendations that cut across divisions and will affect all three NDE divisions and offices can be found in **Section 2.0 – 6.0**.

OVERALL NDE REORGANIZATION

One of the questions from the request for proposals for this study addressed the issue of the overall organization of the department:

Does the NDE organizational structure reflect a logical alignment of functions/programs and adequate spans of control?

In addressing this question, the Public Works LLC team reviewed the July 9, 2024, rendition of the NDE's overall organization and how the various offices and departments operated within the three broad divisions to access efficiency, effectiveness, and span of control. The Public Works LLC team based the recommendation for the reorganization of NDE on interview notes, focus group notes, the NDE staff survey, the LEA survey, peer state comparisons, and best practices derived from research.

Public Works team members also analyzed NDE staffing, challenges with responding to the Nevada Legislature/Legislation, salaries, and staff turnover. These issues are part of NDE's context and will directly impact the success of any reorganization effort. Therefore, these issues are addressed before the reorganization findings and recommendations.

FINDING

Compared to the peer state departments of education as well as other DOEs in states that have a similar number of school districts, NDE is significantly understaffed.

Whether the comparison point is the number of staff per total student population, the number of staff per the total schools in the state, or, in the case of states with a similar number of school districts, the number of staff per district, Nevada has substantially fewer staff in all of those ratios.

For students per DOE employee, Nevada has 2,458 students for every NDE staff member compared to Arkansas with 885, Kentucky with 1,315, Oregon with 781, Tennessee with 1,108, and Utah with 1,573. NDE could add 100 staff members and still have a higher ratio than Utah, the next highest.

Similarly, when comparing the number of schools including charters in the state to the number of DOE employees, Nevada is again the highest. NDE has 3.8 schools per employee whereas Arkansas has 1.9, Kentucky 3.1, Oregon 1.8, Tennessee 2.1, and Utah 2.5.

There are only a few states that have as few districts as Nevada. Delaware, with 142,000 students, has 17 districts and 305 employees, or 17.9 employees per school district. Vermont has 140,000 students, 32 districts, and 373 employees for a ratio of 11.7 employees per district. Maryland has 889,000 students but only 24 districts and 1725 employees for a ratio of 71.9 employees per district. NDE's ratio is 9.9 employees per district.

Exhibit 1-1 below provides a comparison of the number of employees for NDE and the comparison departments of education as well as the ratio of statewide students to the number of department employees. In this comparison of the staffing in various state departments of education, Nevada stands out with the highest students per employee ratio. The implications of this staffing level for Nevada include the following:

- **Lowest Number of Employees:**
 - Nevada has 197 full-time equivalent (FTE) employees, significantly lower than other states with similar or slightly larger student populations (e.g., Oregon and Utah).
 - This low number of employees indicates limited staffing resources in NDE, which impacts the department's ability to provide adequate support, oversight, and direct services.
- **High Students per Employee Ratio:**
 - Nevada has a ratio of 2,458 students per employee, the highest in the peer group by a substantial margin. In comparison:
 - Utah has the next highest ratio at 1,573 students per employee.
 - Oregon has one of the lowest ratios, with only 781 students per employee.
 - This high ratio suggests a potentially overwhelming workload for each NDE employee, which can lead to decreased efficiency and the risk of burnout.
- **Comparative Analysis with Other States:**
 - Tennessee serves over 1 million students with 909 employees, yielding a much lower student-to-employee ratio of 1,108. This allows for more resources and support per student.
 - Arkansas and Oregon both have relatively low ratios (885 and 781 students per employee, respectively), indicating a more balanced workload for their staff.
- **Specific Implications for Nevada:**
 - **Resource Constraints:** Nevada's limited staffing affects the capacity to offer comprehensive services, support programs, and respond effectively to educational needs at the state level. This constraint impacts the quality of oversight, policy implementation, and support provided to local school districts.
 - **Need for Strategic Investments:** NDE should consider requesting the number of FTE positions to bring the student-to-employee ratio closer to that of other states. This would improve service quality, administrative responsiveness, and support for schools and students.

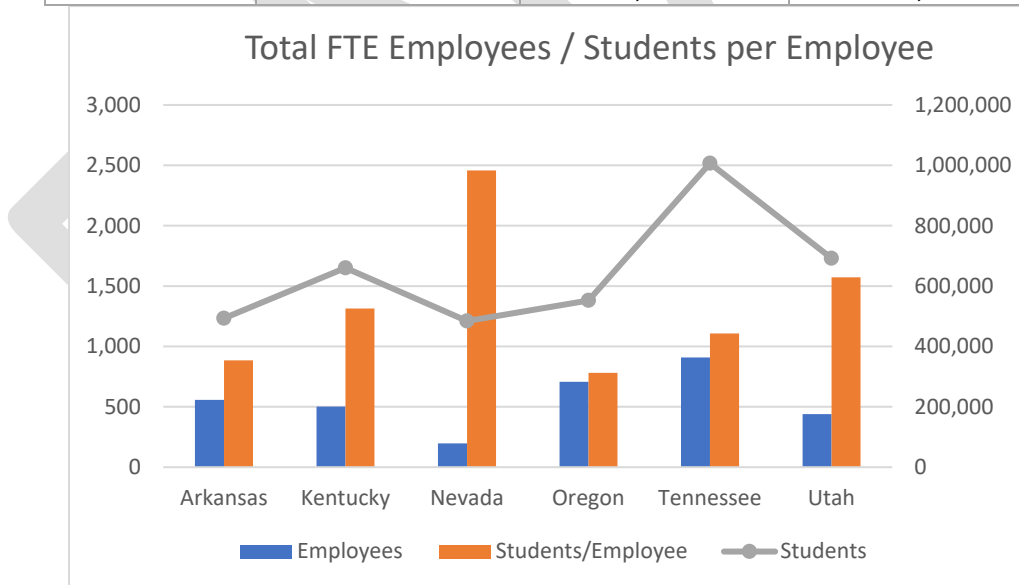
- Risk of Lower Performance and Employee Turnover: With such a high student-to-employee ratio, Nevada's employees may face higher levels of stress and job dissatisfaction, potentially leading to turnover. Retaining qualified staff is challenging without additional support and reasonable workload distribution.
- Policy Considerations:
 - The data suggests Nevada should re-evaluate its staffing model within the Department of Education. Increasing staffing levels would help the department better serve its student population and support educational outcomes more effectively.
 - NDE's high student-to-employee ratio can be used as a basis to advocate for increased state funding or restructuring within the department to improve operational efficiency.

EXHIBIT 1-1

COMPARISON OF THE NUMBER OF EMPLOYEES FOR NEVADA AND THE COMPARISON DOES

Total FTE Employees / Students per Employee

State	Employees	Students/Employee	Students
Arkansas	557	885	493,130
Kentucky	502	1,315	660,029
Nevada	197	2,458	484,192
Oregon	707	781	552,380
Tennessee	909	1,108	1,006,752
Utah	440	1,573	691,906



Sources: NDE & the Departments of Education for Arkansas, Kentucky, Oregon, Tennessee, and Utah, 2024.

Number of Employees Per School

Exhibit 1-2 below compares the number of state department of education employees to the number of schools that each department serves. Based on the data, Nevada has the highest "Schools per Employee" ratio among the states listed, with 3.8 schools per employee. The key observations include:

- Efficiency:
 - NDE operates with fewer employees (3.8) relative to the number of schools compared to the other states.
 - The next closest is Kentucky with 3.1 schools per employee, followed by Utah at 2.5 schools per employee.
 - Arkansas, Oregon, and Tennessee have significantly lower ratios, ranging from 1.8 to 2.1 schools per employee.
 - States with lower ratios (like Oregon at 1.8 or Arkansas at 1.9) suggest they have more DOE staff dedicated to supporting fewer schools, indicating more administrative resources per school.
- Number of Employees:
 - Nevada has the smallest number of DOE employees at 197, reflecting its high ratio.
 - By contrast, Tennessee employs the most staff (909 employees) but has only 2.1 schools per employee.
- Number of Schools:
 - Nevada has the fewest schools (748), which could partially explain the smaller DOE workforce. However, the schools-to-employee ratio still indicates a leaner operation compared to states with a similar number of schools (e.g., Arkansas with 1,084 schools and 557 employees).

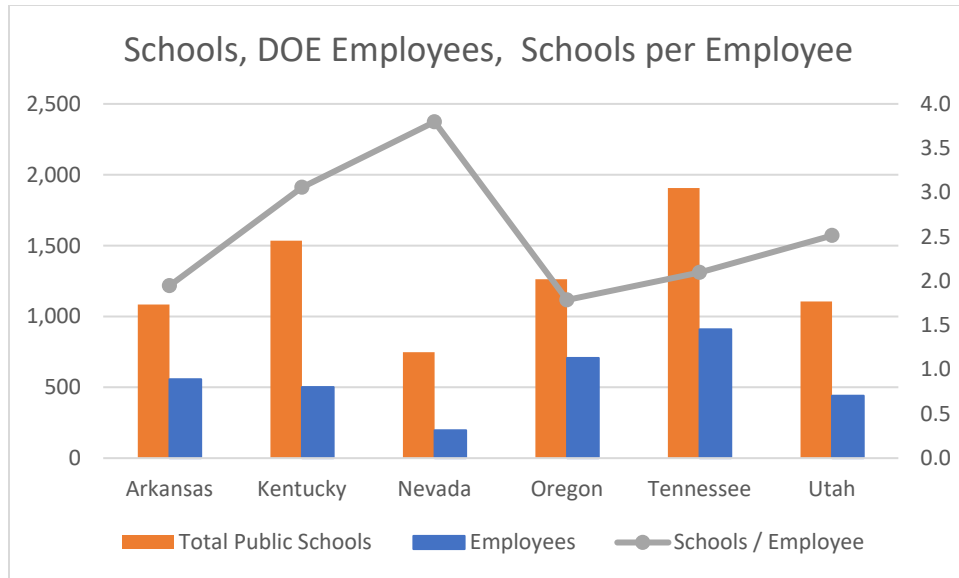
NDE stands out for its high number of schools-per-employee ratio, suggesting an under-resourced staffing structure compared to other states.

EXHIBIT 1-2

COMPARISON OF DOE EMPLOYEES TO THE NUMBER OF SCHOOLS THAT DOES SERVE

Schools, DOE Employees, Schools per Employee

State	Total Public Schools	Employees	Schools / Employee
Arkansas	1,084	557	1.9
Kentucky	1,535	502	3.1
Nevada	748	197	3.8
Oregon	1,263	707	1.8
Tennessee	1,906	909	2.1
Utah	1,106	440	2.5



Sources: NCES, NDE, and the Departments of Education for Arkansas, Kentucky, Oregon, and Tennessee, 2024.

Department of Education Employees Per School District

A final data point to illustrate NDE staffing levels compared to other states is the number of districts served. When comparing the number of state department of education employees to the number of school districts served, states with similar numbers of school districts were selected for several reasons:

- By comparing states with similar numbers of districts, the analysis focuses on differences in efficiency, staffing models, and resource allocation strategies rather than on differences in scale.
- To understand the efficiency or effectiveness of staffing, states must be analyzed within a comparable context.
- If states with vastly different numbers of districts are compared, differences in staffing may be attributed incorrectly to inefficiency or overstaffing rather than to the realities of managing a larger or smaller number of districts.
- By selecting states with similar numbers of school districts, comparisons focus on differences in staffing strategies, resource allocation, and administrative efficiency, rather than being skewed by differences in workload size or operational scale.

Exhibit 1-3 shows the comparison of department of education staffing to the number of districts rather than the number of students or the number of schools. Three states with similar numbers of school districts were selected: Delaware, Vermont, and Maryland. Key observations include:

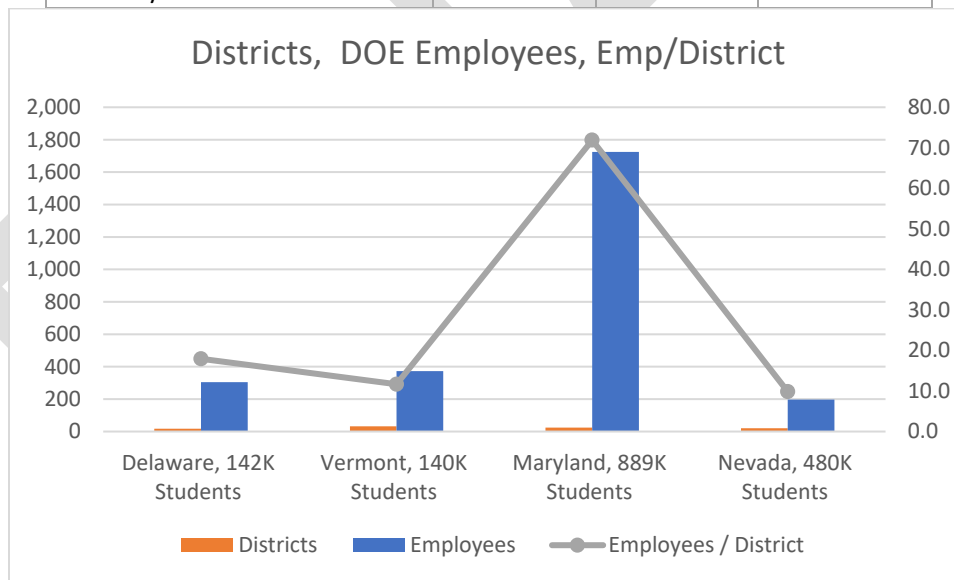
- Employees per District:
 - Nevada has the lowest ratio of employees per district at 9.9.
 - Delaware has 17.9 employees per district, almost double Nevada's ratio.
 - Vermont has 11.7 employees per district, which is slightly higher than Nevada.
 - Maryland has the highest ratio with 71.9 employees per district, significantly exceeding all other comparison states.

- **Efficiency and Resource Allocation:** Nevada's low employees-per-district ratio suggests a highly lean administrative structure. This could indicate potential under-resourcing if administrative tasks are not being adequately supported.
- **Comparison to Similar States:** Delaware and Vermont, which serve fewer students but have similar numbers of districts, employ significantly more staff per district, suggesting a different administrative approach or higher investment in DOE personnel.
- **Maryland's Exceptionally High Ratio:** Maryland's staffing is disproportionately higher, reflecting either centralized administrative responsibilities, the larger student population, or unique policy and structural differences.

EXHIBIT 1-3
COMPARISON DOE STAFFING TO THE NUMBER OF DISTRICTS SERVED

Districts, Employees, and Employees Per District

State/Total # of Students	Districts	Employees	Employees / District
Delaware/142K Students	17	305	17.9
Vermont/140K Students	32	373	11.7
Maryland/889K Students	24	1,725	71.9
Nevada/480K Students	20	197	9.9



Source: NCES, NDE, and the Departments of Education for Delaware, Vermont, and Maryland, 2024.

When a state department of education is significantly understaffed compared to its counterparts, it can have several adverse consequences for school districts, individual schools, and overall student achievement:¹

¹ U.S. Department of Education; Amergis Education, 2024.

1. Diminished Support and Oversight

State education departments play a crucial role in providing guidance, resources, and oversight to local school districts. Understaffing can lead to delays in policy implementation, reduced monitoring of educational standards, and limited assistance with curriculum development. This lack of support can leave districts without the necessary tools to effectively educate students.

2. Challenges in Addressing Staffing Shortages

Understaffed state departments may struggle to assist districts facing their own staffing shortages. For instance, during the 2023-2024 school year, nearly 90 percent of U.S. K-12 public schools reported challenges in hiring both teaching and non-teaching positions. These widespread staffing shortages negatively impact teachers, students, and the school system in many ways. The ripple effect of being understaffed should not be underestimated.

3. Inequitable Resource Distribution

State departments are responsible for ensuring equitable distribution of resources and funding. Insufficient staffing can hinder their ability to monitor and address disparities, potentially exacerbating inequities between affluent and low-income districts. This can lead to significant differences in educational quality and student outcomes.

4. Impaired Implementation of Educational Initiatives

New educational programs and reforms require effective coordination and support from state departments. Understaffing can delay or derail these initiatives, preventing schools from accessing innovative teaching methods, technologies, or interventions designed to enhance student learning.

5. Reduced Professional Development Opportunities

State departments often provide or facilitate professional development for educators. With limited staff, these opportunities may be reduced, affecting teacher effectiveness and, consequently, student achievement.

6. Increased Administrative Burden on Local Districts

In the absence of adequate state support, local districts may need to take on additional administrative responsibilities. This can divert attention and resources away from classroom instruction and student support services.

7. Potential Decline in Student Achievement

Collectively, these challenges can contribute to a decline in student achievement. For example, the No Child Left Behind Act emphasized the importance of state support in improving educational outcomes. Without sufficient staffing at the state level, schools may struggle to meet academic standards, leading to lower student performance.

In summary, significant understaffing in a state department of education can create a cascade of challenges that impede the effectiveness of school districts and schools, ultimately affecting student

achievement. Adequate staffing is essential to maintain the support systems necessary for a high-functioning educational environment. One of the root causes of NDE's perceived underperformance is lack of staff. Simply reorganizing a severely understaffed DOE will not solve the problem.

RECOMMEDATION 1-1:

The Nevada Department of Education should develop a six-year plan to increase staffing levels similar to those of the Utah and Tennessee Departments of Education.

To determine where and when additional staffing is needed over the six-year period, NDE can follow these data-driven steps to align staffing growth with priorities, needs, and impact:

Step 1: Use the Public Works LLC Report as a Basis for Conducting a Comprehensive Needs Assessment

- Objective: Identify critical gaps in staffing, workload, and support services.
- Actions:
 - Review each department and division within the NDE (e.g., curriculum, accountability, finance, special education, IT, etc.).
 - Identify essential functions where staff shortages affect performance and compliance.
 - Survey school districts to gather feedback on areas where NDE support can be improved (e.g., training, grants management, and federal compliance).
 - Benchmark workloads and roles against similarly sized and staffed state education departments.
 - Identify areas where schools per employee are particularly high.

Timeline: Months 1-6 (Year 1)

Step 2: Prioritize Staffing Needs by Function

- Objective: Rank departments and positions based on urgency and impact.
- Actions:
 - Classify roles into the following tiers:
 1. Critical Need: Positions required for regulatory compliance, school funding administration, or essential operational support.
 2. High Impact: Positions that improve school/district outcomes, such as curriculum specialists, professional development staff, or data analysts.
 3. Long-term Value: Roles that enhance capacity and innovation, such as IT or policy analysts.
 - Assign priority ratings (e.g., 1-5) for each role based on workload, capacity gaps, and impact on schools.
 - Outcome: Develop a prioritized hiring list.

Timeline: Months 6-12 (Year 1)

Step 3: Conduct Workload Analysis

- Objective: Determine the number of employees needed for each function.
- Actions:
 - Use quantitative metrics (e.g., schools per staff member, caseload per specialist) to evaluate staffing shortfalls.
 - Analyze current workloads using employee surveys, time-tracking, and workload logs.
 - Estimate ideal staffing for each role based on best practices from states with better ratios (e.g., Arkansas or Tennessee).
 - Determine staffing benchmarks per 100 schools for different NDE functions (e.g., one federal grants administrator per 75 schools).

Timeline: Year 1-2

Step 4: Create a Staffing Allocation Plan

- Objective: Determine how many employees to hire each year and where they will be assigned.
- Actions:
 - Align the prioritized roles with a six-year hiring schedule.
 - Allocate hires based on immediate needs in Years 1–3 and longer-term roles in Years 4–6.
 - Use the following approach for annual allocations:
 - Year 1–2: Critical compliance and administrative functions.
 - Year 3–4: High-impact roles like curriculum specialists and program evaluators.
 - Year 5–6: Long-term support roles (IT, research analysts, policy innovation).

Step 5: Develop Staffing Performance Metrics

- Objective: Measure the effectiveness and impact of new hires.
- Actions:
 - Track key performance indicators (KPIs):
 - Reduced administrative delays.
 - Improved compliance with federal/state mandates.
 - Increased support for school districts (measured through surveys).
 - Reduced schools-per-staff ratios.
 - Improved LEA satisfaction with NDE.
 - Adjust the hiring plan annually based on KPIs and emerging needs.

Timeline: Ongoing, Years 1–6

Step 6: Secure Legislative Support and Budget

- Objective: Ensure funding and political support for the plan.
- Actions:
 - Develop a staffing justification report based on the needs assessment and workload analysis.

- Present a six-year budget forecast to the biennial legislature.
- Highlight:
 - How the plan aligns with other states.
 - The positive impact on schools and students.
 - The risk of non-compliance or inefficiency without additional staffing.

Timeline: Present to legislature in Year 1 and Year 3 to align with biennial budget cycles.

Step 7: Monitor and Adjust the Plan Annually

- Objective: Ensure flexibility as priorities or needs evolve.
- Actions:
 - Annually reassess workloads, emerging priorities, and program impacts.
 - Adjust staffing allocations and timelines accordingly.
 - Ensure transparency by publishing annual progress reports.

Summary of Timeline

Action	Timeline
Comprehensive Needs Assessment	Year 1 (Months 1–6)
Prioritize Staffing Needs	Year 1 (Months 6–12)
Workload Analysis	Year 1–2
Staffing Allocation Plan	Year 2–3
Legislative Budget Support	Year 1, Year 3
Hiring and Annual Review	Years 1–6

By following this methodical approach, NDE can identify specific staffing needs, prioritize hires based on urgency, and strategically allocate resources to achieve staffing parity over six years. This ensures the plan is both data-driven and adaptable to real-world conditions.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

THE NEVADA LEGISLATURE: THE NEED FOR MORE NDE INVOLVEMENT

Much of NDE's work is driven by legislation passed by the Nevada Legislature. At times, the Nevada Legislature does not collaborate or consult NDE leadership prior to introducing or passing legislation involving PK-12 education and school districts. This makes it more difficult for NDE to carry out legislative intent and further stresses a severely understaffed department of education.

Best practices show more involvement and collaboration in the proposed legislation can have a more positive outcome for NDE and the school districts. A summary of the rationale for involving NDE leadership in potential legislation follows:

1. Expertise of Education Staff

- **Highlight the Expertise:** State departments of education employ professionals who have a deep understanding of the issues schools and students face. From curriculum development to student mental health, they are knowledgeable about the impact of policies on real-world outcomes.
- **Real-World Data:** Education staff have access to vast amounts of data, like student performance metrics and demographic information, which can provide valuable insights when drafting legislation. Their expertise can help ensure that the legislation addresses the actual needs of students, educators, and communities.

2. Practical Implications of Legislation

- **Avoiding Unintended Consequences:** Policies made in isolation may have unintended consequences. For instance, if a bill doesn't consider how schools will implement it (e.g., budget impacts, staffing needs), it could burden schools rather than help them. Education departments can point out these issues early, before laws are passed.
- **Cost and Resource Planning:** The department can assess whether legislation is feasible given current resources or if it will require additional funding and infrastructure. They can also suggest how best to allocate resources to meet the goals of the law.

3. Ensuring Stakeholder Engagement

- **Collaboration with Teachers and Administrators:** Education departments often have established networks with teachers, school administrators, and local education leaders. These professionals can provide critical feedback on how legislation might impact their work and the students they serve.
- **Inclusion of Diverse Perspectives:** State departments of education can ensure that legislation takes into account the diversity of students across the state, including those with disabilities, English language learners, and students from rural or underserved communities.

4. Ensuring Long-Term Sustainability

- **Building Sustainable Policies:** Without collaboration, legislation may focus on short-term goals at the expense of long-term success. The department can help lawmakers develop policies that are sustainable, keeping in mind future generations of students and evolving educational needs.

- **Teacher Professional Development:** Changes in legislation often require shifts in how educators teach. Education departments can help design appropriate training and professional development programs to ensure teachers can effectively implement new policies.

5. Increased Legitimacy and Support

- **Broad Support from Educators:** When lawmakers collaborate with education departments, it sends a message to educators and the public that the legislation is well-informed and supported by those who are closest to the issues. This can increase buy-in from teachers and school leaders who might otherwise be skeptical of new laws.
- **Avoiding Resistance:** Without consultation, legislation could face pushback from school leaders, teachers, and parents. Collaborating early can help reduce resistance and make the implementation process smoother.

6. Examples of Successful Collaboration

- **Cite Success Stories:** Look for instances where collaboration between legislators and state departments of education has led to successful, impactful legislation. For example, a bill that was improved through consultation with educators could serve as a concrete example of how this approach works.
- **Lessons from Missteps:** If there are examples where education laws faced significant challenges due to lack of consultation, those could serve as cautionary tales.

7. Building a Model for Future Collaboration

- **Establish Regular Communication:** Propose the creation of advisory boards or task forces that include representatives from state education departments to ensure ongoing communication between legislators and education professionals.
- **Early Consultation:** Encourage legislators to reach out to the education department early in the drafting process, rather than waiting until the bill is almost ready to be voted on.

NDE NON-COMPETITIVE SALARY/COMPARISON WITH OTHER STATE DEPARTMENTS OF EDUCATION

FINDING

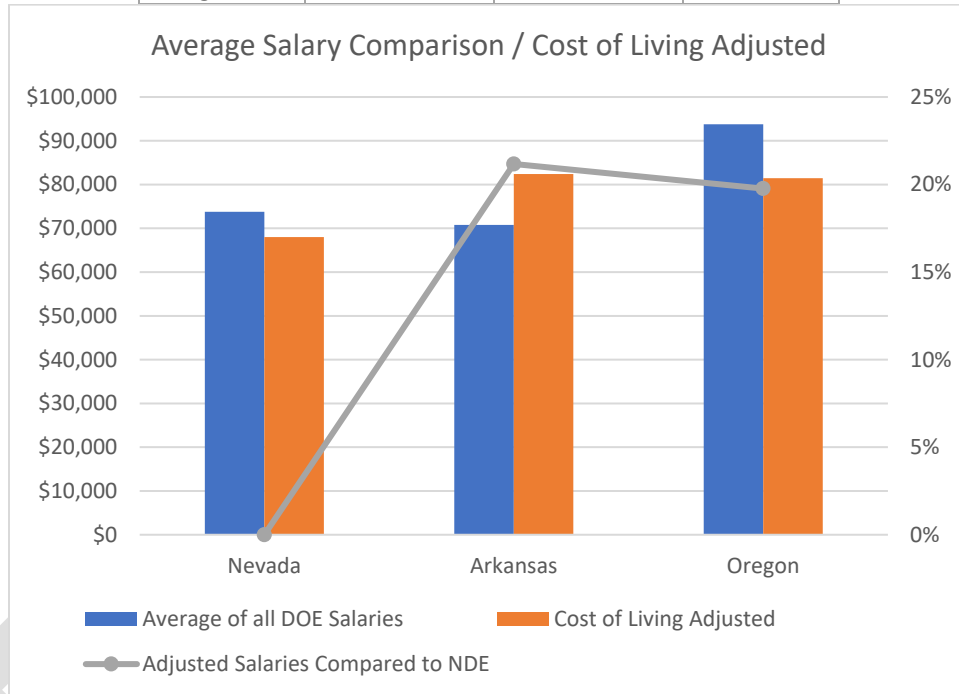
Salaries at the Nevada Department of Education are pointedly lower than the Arkansas and Oregon departments of education, the only peer states that provided salary data for comparison. When adjusted for the cost-of-living in each state, Nevada salaries are from 19.8 percent to 21.2 percent lower than the peer states. (Kentucky and Utah did not respond to requests for salary information. Tennessee provided average salaries by position from which an overall average salary could not be computed.)

Exhibit 1-4 shows the composite, unadjusted for cost-of-living average salaries for all employees at the Nevada Department of Education compared to the Arkansas and Oregon departments of education. The exhibit also shows the average salaries as adjusted for the cost-of-living in each state. In comparing the nominal or unadjusted salaries as well as adjusted salaries, the key observations include:

- **Nevada (NDE):**
 - **Average Salary:** \$73,790
 - **Cost-of-Living Adjusted Salary:** \$68,009
 - Serves as the baseline for comparison (0.0% adjustment).
 - Cost-of-living is higher, indicating a more competitive pay structure relative to living costs.
- **Arkansas (ADE):**
 - **Average Salary:** \$70,791 (4.1% lower than NDE's average salary).
 - **Cost-of-Living Adjusted Salary:** \$82,410 (21.2% higher than NDE's adjusted salary).
 - Arkansas offers lower nominal salaries but adjusts favorably when considering cost of living, indicating better relative purchasing power compared to Nevada.
- **Oregon (ODE):**
 - **Average Salary:** \$93,756 (27% higher than NDE's average salary).
 - **Cost-of-Living Adjusted Salary:** \$81,456 (19.8% higher than NDE's adjusted salary).
 - Oregon's DOE salaries are among the highest nominally but adjust to a smaller advantage due to higher living costs.
- **Cost-of-Living Impact:**
 - Despite having the lowest adjusted salary, Nevada maintains a baseline average salary close to Arkansas but lags significantly when considering purchasing power.
- **Arkansas' Efficiency:**
 - Although Arkansas offers nominal salaries lower than Nevada, its cost-of-living adjustment provides a 21.2 percent advantage, demonstrating a better alignment between wages and affordability.
- **Oregon's High Nominal Salaries:**
 - Oregon pays significantly higher nominal salaries compared to Nevada (+27%), but its cost-of-living adjustment reduces this advantage to 19.8 percent, indicating the impact of its higher living costs.
- **Nevada's Position:**
 - Nevada lags behind both states in terms of cost-of-living-adjusted salaries, suggesting that NDE employees have less purchasing power despite a moderate nominal salary.
- NDE offers the least competitive salaries when adjusted for cost of living, making it potentially harder to attract and retain employees compared to states like Arkansas or Oregon.
- This comparison highlights the importance of not just nominal salaries but also their real-world purchasing power, with cost-of-living adjustments providing a clearer picture of compensation fairness.

EXHIBIT 1-4
STATE DOE SALARY AVERAGES & ADJUSTED AVERAGES

State	Average of all DOE Salaries	Cost of Living Adjusted Average	Adjusted Salaries Compared to NDE
Nevada	\$73,790	\$68,009	0.0%
Arkansas	\$70,791	\$82,410	21.2%
Oregon	\$93,756	\$81,456	19.8%



Sources: NDE, ADE, ODE, 2024.

Salary Comparison by Position

Four departments of education (Nevada, Tennessee, Arkansas and Oregon) provided salary information by the positions in the organization. Using position titles only, similarly titled positions were compiled to illustrate how salaries in the other state departments of education compared with Nevada. As a result of the variety in the position titles, only 27 of Nevada's 47 position titles matched with at least one of the other states. Different states might use identical titles for positions with different scopes of responsibility, or conversely, different titles for similar roles. For the analysis to be meaningful, job descriptions and qualifications should also be considered. There are four positions for which each state has position titles that are identical or similar: Audit Manager, Deputy Superintendent, IT Manager, and Public Information Officer. For the chief executive position, each of the states has a different title: Superintendent of Public Instruction in Nevada, Commissioner of Education in Tennessee, Secretary of Education in Arkansas, and Director of the Department of Education in Oregon.

Exhibit 1-5 shows the salaries for the comparable positions by position:

EXHIBIT 1-5
AVERAGE SALARIES BY COMPARABLY TITLED POSITIONS

Position	NDE	TDE	ADE	ODE
ACCOUNTING ASSISTANT 2	\$39,022		\$46,743	\$61,113
ACCOUNTING ASSISTANT 3	\$43,327		\$58,053	\$81,156
ADMIN ASSISTANT 2	\$44,191	\$58,272		\$48,701
ADMIN ASSISTANT 3	\$44,538	\$59,160		\$43,718
ADMIN ASSISTANT 4	\$49,277	\$68,268		\$67,307
ADMINR, OFC OF ASSESS, DATA&ACC	\$105,950			\$143,808
AUDIT MANAGER	\$75,540	\$150,024	\$71,911	\$107,460
AUDITOR 2	\$61,404	\$72,660		\$61,032
AUDITOR 3	\$73,554	\$87,684		\$73,752
BUDGET ANALYST 2	\$67,618		\$49,805	
BUDGET ANALYST 3	\$88,193		\$54,201	
DEP SUPT ADMIN/FISCAL SVCS	\$104,657	\$235,404	\$191,333	\$229,272
DEP SUPT INST/RSRCH/EVAL (EA)	\$113,422	\$235,404	\$191,333	\$229,272
EDUCATION & INFORMATION OFCR	\$69,741	\$138,960		
EDUCATION PROGRAMS DIRECTOR	\$86,489	\$107,784		\$99,429
EDUCATION PROGRAMS PROFESSIONL	\$92,264	\$93,120		\$112,251
EDUCATION PROGRAMS SUPERVISOR	\$96,629	\$180,648		\$180,303
EXECUTIVE ASSISTANT	\$63,973	\$99,804		\$76,488
GRANTS & PROJECTS ANALYST 2	\$73,287	\$71,880	\$70,877	
IT MANAGER 1	\$90,749	\$110,004	\$102,124	\$158,400
IT PROFESSIONAL 2	\$87,358	\$90,156	\$62,842	\$92,421
IT PROFESSIONAL 3	\$87,978		\$81,636	\$116,470
MANAGEMENT ANALYST 1	\$62,847			\$86,775
MANAGEMENT ANALYST 2	\$62,888			\$92,286
MANAGEMENT ANALYST 3	\$81,094			\$108,295
PUBLIC INFORMATION OFFICER 2	\$84,229	\$145,584	\$72,225	\$174,588
SUPT OF PUBLIC INSTRUCTION	\$144,000	\$270,336	\$262,650	\$288,516

Sources: NDE, TDE, ADE, ODE, 2024.

Department of Education Salaries Adjusted for Cost-of-Living

Exhibit 1-6 shows the cost-of-living adjusted salaries for the 27 positions that had the same or similar position titles. It also shows the percentage difference from the Nevada salaries. Data for the cost-of-living came from U.S. Bureau of Economic Analysis (BEA) – Regional Price Parities (RPP) 2023. Cost-of-living adjustments are essential to ensure meaningful comparisons of salaries across the states. They reflect the real value of compensation in each state, providing a clearer picture of which state offers the best financial situation for employees relative to their local economic conditions. This approach helps states assess their competitiveness and address gaps in employee compensation to attract and retain qualified education professionals.

Key observations from this analysis include the following:

- **NDE lags behind TDE, ADE, and ODE** for most positions, often significantly, after adjusting for cost of living.

- Leadership positions such as Deputy Superintendent and Superintendent show the **largest disparities** in adjusted salaries, where TDE, ADE, and ODE pay over **100 percent more** than NDE.

High-Level Positions

DEPUTY SUPERINTENDENT OF ADMINISTRATION/FISCAL SERVICES:

- NDE: \$96,458 | TDE: \$264,796 (+175%) | ADE: \$222,739 (+131%) | ODE: \$199,194 (+107%)
 - NDE salaries for this position are drastically lower, which may impact the ability to attract qualified candidates for top roles.

SUPERINTENDENT OF PUBLIC INSTRUCTION:

- NDE: \$144,000 | TDE: \$304,090 (+127%) | ADE: \$305,762 (+128%) | ODE: \$250,666 (+87%)
 - Similarly, Nevada pays significantly less for its top leadership position, potentially weakening its competitiveness.

Mid-Level and Specialist Positions

AUDIT MANAGER:

- NDE: \$69,622 | TDE: \$168,756 (+142%) | ADE: \$83,715 (+20%) | ODE: \$93,362 (+34%)
 - NDE is uncompetitive, especially compared to TDE, where salaries are more than double.

EDUCATION PROGRAMS SUPERVISOR:

- NDE: \$88,899 | TDE: \$203,204 (+129%) | ODE: \$156,649 (+76%)
 - Similar trends show a lack of parity for these specialized and critical education roles.

PUBLIC INFORMATION OFFICER 2:

- NDE: \$77,630 | TDE: \$163,762 (+111%) | ADE: \$84,080 (+8%) | ODE: \$151,684 (+95%)
 - Nevada trails all states, particularly Tennessee and Oregon, in compensating this role.

Administrative and Support Roles

ACCOUNTING ASSISTANT 2 AND 3:

- **Accounting Assistant 2:** NDE: \$35,965 | ADE: \$54,416 (+51%) | ODE: \$53,095 (+48%)
- **Accounting Assistant 3:** NDE: \$39,933 | ADE: \$67,582 (+69%) | ODE: \$70,509 (+77%)
 - Even lower-level positions receive significantly higher pay in ADE and ODE.

ADMINISTRATIVE ASSISTANTS:

- **Admin Assistant 2:** NDE: \$40,729 | TDE: \$65,548 (+61%) | ODE: \$42,311 (+4%)
- **Admin Assistant 3:** NDE: \$41,048 | TDE: \$66,547 (+62%) | ODE: \$37,983 (-7%)
 - NDE salaries are uncompetitive with TDE and ADE, but occasionally close to ODE.

IT and Technical Roles

IT MANAGER 1:

- NDE: \$83,640 | TDE: \$123,739 (+48%) | ADE: \$118,887 (+42%) | ODE: \$137,619 (+65%)
 - Nevada pays significantly less in tech roles, where competitive salaries are critical to recruitment.

IT PROFESSIONAL 2:

- NDE: \$80,514 | TDE: \$101,413 (+26%) | ADE: \$73,157 (-9%) | ODE: \$80,296 (0%).
 - NDE is slightly competitive with ADE and ODE but trails TDE.

Management Analysts

- **Management Analyst 1:** NDE: \$57,923 | ODE: \$75,391 (+30%)
- **Management Analyst 2:** NDE: \$57,962 | ODE: \$80,179 (+38%)
 - NDE salaries lag across all analyst roles.

In summary:

- **Significant Gaps in Leadership Salaries:**
 - NDE struggles to compete for leadership roles, particularly compared to TDE and ADE.
- **Specialist and Mid-Level Positions Undercompensated:**
 - Many critical positions (e.g., Audit Manager, Education Programs Supervisor) show gaps ranging from **20 percent to 130 percent** in salaries compared to peers.
- **Competitiveness in Entry-Level Roles:**
 - Some administrative and IT positions are more competitive with ODE but still lag significantly behind TDE and ADE.
- **Implications for Recruitment and Retention:**
 - Nevada's cost-of-living-adjusted salaries reveal significant disadvantages in attracting and retaining top talent for most education department roles.

EXHIBIT 1-6 DEPARTMENT OF EDUCATION COST-OF-LIVING ADJUSTED SALARIES % DIFFERENCE FROM NDE

Position	NDE Adjusted	TDE Adjusted	ADE Adjusted	ODE Adjusted	TDE	ADE	ODE
ACCOUNTING ASSISTANT 2	\$35,965		\$54,416	\$53,095		51%	48%
ACCOUNTING ASSISTANT 3	\$39,933		\$67,582	\$70,509		69%	77%
ADMIN ASSISTANT 2	\$40,729	\$65,548		\$42,311	61%		4%
ADMIN ASSISTANT 3	\$41,048	\$66,547		\$37,983	62%		-7%
ADMIN ASSISTANT 4	\$45,417	\$76,792		\$58,477	69%		29%
ADMINR, OFC OF ASSESS, DATA&ACC	\$97,650			\$124,942			28%
AUDIT MANAGER	\$69,622	\$168,756	\$83,715	\$93,362	142%	20%	34%
AUDITOR 2	\$56,594	\$81,732		\$53,025	44%		-6%

Position	NDE Adjusted	TDE Adjusted	ADE Adjusted	ODE Adjusted	TDE	ADE	ODE
AUDITOR 3	\$67,791	\$98,632		\$64,076	45%		-5%
BUDGET ANALYST 2	\$62,321		\$57,980			-7%	
BUDGET ANALYST 3	\$81,284		\$63,097			-22%	
DEP SUPT ADMIN/FISCAL SVCS	\$96,458	\$264,796	\$222,739	\$199,194	175%	131%	107%
DEP SUPT INST/RSRCH/EVAL (EA)	\$104,536	\$264,796	\$222,739	\$199,194	153%	113%	91%
EDUCATION & INFORMATION OFCR	\$64,277	\$156,310			143%		
EDUCATION PROGRAMS DIRECTOR	\$85,212	\$121,242		\$86,385	42%		1%
EDUCATION PROGRAMS PROFESSIONL	\$76,050	\$104,747		\$97,525	38%		28%
EDUCATION PROGRAMS SUPERVISOR	\$88,899	\$203,204		\$156,649	129%		76%
EXECUTIVE ASSISTANT	\$58,961	\$112,265		\$66,454	90%		13%
GRANTS & PROJECTS ANALYST 2	\$67,546	\$80,855	\$82,511		20%	22%	
IT MANAGER 1	\$83,640	\$123,739	\$118,887	\$137,619	48%	42%	65%
IT PROFESSIONAL 2	\$80,514	\$101,413	\$73,157	\$80,296	26%	-9%	0%
IT PROFESSIONAL 3	\$81,086		\$95,036	\$101,190		17%	25%
MANAGEMENT ANALYST 1	\$57,923			\$75,391			30%
MANAGEMENT ANALYST 2	\$57,962			\$80,179			38%
MANAGEMENT ANALYST 3	\$74,741			\$94,087			26%
PUBLIC INFORMATION OFFICER 2	\$77,630	\$163,762	\$84,080	\$151,684	111%	8%	95%
SUPT OF PUBLIC INSTRUCTION	\$133,841	\$304,090	\$305,762	\$250,666	127%	128%	87%

Source: Peer State Department of Education websites, 2024.

NDE's lower average salaries compared to those in the Arkansas, Oregon, and Tennessee departments of education could have several significant impacts on the department itself and on the overall quality of public education in Nevada. Here are potential consequences:

Impacts on the Nevada Department of Education

- Recruitment Challenges:
 - Lower salaries may make it difficult for NDE to attract top talent for key administrative, policy, and Education Program Professional (EPP).
 - Professionals may opt to work in states with higher pay, reducing the pool of qualified candidates.
- Retention Issues:
 - Staff turnover may increase as employees seek better-paying opportunities in other states or industries.

- Frequent turnover can lead to a loss of institutional knowledge, which may slow down decision-making and policy implementation.
- **Morale and Productivity:**
 - Lower salaries can negatively affect employee morale, leading to reduced productivity and engagement.
 - Staff may feel undervalued and less motivated to go above and beyond their job descriptions.
- **Limited Professional Development:**
 - With a constrained budget, NDE might not have the resources to invest in training and professional development for its staff, limiting their ability to adopt innovative practices.

Potential Impacts on the Quality of Public Education in Nevada

- **Educational Programs:**
 - Lower salaries might limit the department's ability to fund and support educational initiatives, such as curriculum development, early intervention programs, or advanced STEM education.
- **Policy Implementation:**
 - With fewer experienced and skilled personnel, the department may struggle to design and implement effective educational policies, impacting school performance.
- **Inequity in Education:**
 - Schools in wealthier districts may compensate for state-level shortcomings with local funding, while poorer districts may suffer, increasing educational inequity.
- **Public Perception and Trust:**
 - If the public perceives the NDE as underfunded and understaffed, it may erode trust in the education system and lead to decreased support for public education initiatives.

Sources: DepEd Gazette, Financial Times, Economic Policy Institute, and U.S. Department of Education, 2024.

RECOMMENDATION 1-2:

The Nevada Department of Education should develop a six-year plan to address the lower salaries for department employees.

The plan should be comprehensive, strategic, and data-driven. It should focus on improving compensation while considering the broader impact on recruitment, retention, and the quality of education in Nevada. Suggested steps include:

Step 1. Assessment and Benchmarking (Year 1)

- **Salary Analysis:** Conduct a detailed comparison of NDE salaries with other states (e.g., Arkansas, Oregon, and Tennessee) and private sector equivalents for comparable roles.
- **Workforce Needs Assessment:** Identify critical positions and areas with the most severe recruitment and retention challenges.

- Cost of Living Adjustment (COLA) Review: Assess whether salaries align with Nevada's cost of living and make adjustments where disparities exist.
- Stakeholder Engagement: Consult with NDE staff, union representatives, and policymakers to understand key salary-related issues and priorities.

Step 2. Advocacy and Budget Planning (Years 1–2)

- Budget Proposal Development: Prepare a budget request to increase salaries, phased over six years to ensure fiscal feasibility.
- Legislative Advocacy: Build coalitions with state legislators, education advocates, and community leaders to support increased education funding.
- Public Awareness Campaign: Launch campaigns to educate the public on how competitive salaries benefit Nevada's education system.

Step 3. Phased Salary Adjustments (Years 2–6)

- Targeted Increases:
 - Years 2–3: Focus on critical shortage areas and high turnover departments.
 - Years 4–6: Implement broader salary adjustments for all positions to align with regional averages.
- Merit-Based and Equity Adjustments:
 - Address pay disparities across demographics or geographic regions.
 - Offer additional incentives for high performers and those in hard to recruit positions.

Step 4. Retention and Incentive Programs (Years 2–6)

- Retention Bonuses: Offer annual bonuses to retain experienced staff.
- Professional Development Stipends: Fund training and continuing education to build capacity and improve job satisfaction.
- Work-Life Balance Initiatives: Provide flexible work options, wellness programs, and other non-monetary benefits to enhance employee satisfaction.

Step 5. Long-Term Funding Strategies (Years 1–6)

- Identify New Revenue Streams:
 - Explore education-dedicated taxes, grants, and public-private partnerships.
 - Leverage federal funding opportunities to supplement state resources.
- Efficiency Improvements: Audit department operations to identify cost savings that can be redirected toward salaries.
- Sustainable Budgeting: Ensure that salary increases are part of a long-term, sustainable financial plan.

Step 6. Performance Metrics and Accountability (Years 1–6)

- Key Performance Indicators (KPIs):
 - Track changes in recruitment and retention rates.
 - Measure improvements in staff satisfaction through regular surveys.

- Assess the impact of salary increases on educational outcomes (e.g., student achievement, and teacher quality).
- Annual Reporting: Publish progress reports to maintain transparency and accountability with stakeholders.

Step 7. Partnership Development (Ongoing)

- Collaboration with Higher Education: Partner with universities to strengthen the teacher pipeline, offering scholarships and stipends for students who commit to working in Nevada.
- Business and Community Engagement: Encourage local businesses to invest in educational initiatives, including employee support programs.

Step 8. Contingency Planning (Years 1–6)

- Develop fallback strategies if funding falls short, such as prioritizing the most critical salary adjustments or implementing non-monetary incentives.

Expected Outcomes

- By Year 3:
 - Recruitment for key roles improves.
 - Turnover rates decrease.
 - Staff morale and satisfaction show measurable improvements.
- By Year 6:
 - Salaries reach competitive levels compared to other states.
 - The NDE becomes an employer of choice, attracting and retaining top talent.
 - Improved educational outcomes due to a stronger, more stable workforce.

This six-year plan ensures that salary adjustments are part of a broader strategy to enhance the overall effectiveness of the Nevada Department of Education.

NDE NON-COMPETITIVE SALARY/COMPARISON WITH NDE LOCAL EDUCATION AGENCIES

FINDING

NDE salaries and benefits are not competitive with those offered in Nevada school districts, which is negatively impacting the agency's ability to recruit and retain qualified staff.

Not only are NDE salaries significantly lower than those of other peer departments of education, there is also a distinct discrepancy in the salaries of some of the LEAs that NDE serves.

Salaries and benefits for all state employees are set and administered through the Department of Administration's Division of Human Resource Management, the Public Employees' Retirement System of Nevada, and the Public Employees' Benefit Program. Each of the 17 Nevada school districts, or local education agencies (LEAs), provided salary and benefit data. The quality and quantity of information available from the LEAs varied significantly. Some of the LEAs provided salary schedules while others directed the Public Works LLC team to their website. Public Works LLC then contacted the LEAs by phone or email when additional information or clarification was needed.

Public Works LLC found there were significant variances in the salaries and benefits offered by smaller districts. Districts were categorized as either Large or Small, as shown in **Exhibit 1-7**.

EXHIBIT 1-7
LEAS BY CATEGORY

LEA	Student Count	Category
Carson City School District	7,459	Small
Churchill County School District	3,284	Small
Clark County School District	306,038	Large
Douglas County School District	4,943	Small
Elko County School District	9,595	Small
Esmeralda County School District	75	Small
Eureka County School District	310	Small
Humboldt County School District	3,257	Small
Lander County School District	1,059	Small
Lincoln County School District	958	Small
Lyon County School District	9,205	Small
Mineral County School District	542	Small
Nye County School District	5,787	Small
Pershing County School District	666	Small
Storey County School District	392	Small
Washoe County School District	64,244	Large
White Pine County School District	1,276	Small

Source: NDE 2024-2025 School Year Student Counts as of 10/1/24.

Salary Study

The Nevada Department of Administration is responsible for providing a variety of fiscal and administrative services, including services relating to risk management, fleet management, public works, and human resources management. The Human Resources Division (HR) within the Department of Administration is responsible for the establishment and maintenance of a comprehensive classification and compensation system for the state, the recruiting and posting processes, and maintenance of employee records.

For this analysis, Public Works LLC selected 35 classifications for the salary portion of this study; 30 of these classifications were selected based on historic turnover rates and the other five were leadership positions. In determining the comparability of salaries, Public Works LLC looked at job duties and educational and experience requirements. In a few instances, the LEAs indicated that their principal classification best matched some of the state's positions based on education and experience requirements. In considering these matches, the Public Works LLC team was told during interviews that specific NDE positions such as the Education Program Professional, Supervisor, and Director positions were or are currently filled by former principals, and in those instances the match was considered appropriate.

For the 30 non-leadership classifications, salary rates are shown as hourly rates for comparison purposes, as contracts for various positions vary in school districts (i.e., 190-days, 200-days, 2,660-days and/or 9, 10, 11, 12-month contracts, etc.). Only the published salary ranges were examined for these positions (**Exhibit 1-8**). It is important to note that many of the Small LEAs did not have many of the

listed classifications. For example, none of the Small LEAs had auditor positions. Salary levels in the Small LEAs are generally lower than the salaries paid in the Large LEAs.

When fewer than four responses are shown, the data is not statistically valid and should not be relied on without further investigation. The data, however, is provided to give a general understanding of the salary levels for these positions.

For the leadership positions, some LEAs provided salary ranges while others said that the salaries for leadership positions are set by the local school board at the time of hire; therefore, only an actual salary was provided (**Exhibit 1-9**). For NDE, only actual salaries were available. Since these are all full-time positions, the results are shown in terms of annual salaries.

FINAL

EXHIBIT 1-8
SALARY COMPARISONS
30 CLASSIFICATIONS

Classification	State		All (Average)					Large Only (Average)				
	Min	Max	Min	% Diff	Max	% Diff	# Resps	Min	% Diff	Max	% Diff	# Resps
Accounting Assistant I	\$18.88	\$27.15	\$19.05	-0.9%	\$27.12	0.1%	9	\$19.81	-4.9%	\$27.89	-2.7%	2
Accounting Assistant II	\$20.42	\$29.56	\$21.57	-5.6%	\$34.15	-15.5%	11	\$20.80	-1.8%	\$29.28	0.9%	2
Accounting Assistant III	\$22.13	\$32.23	\$23.71	-7.1%	\$34.17	-6.0%	7	\$26.51	-19.8%	\$37.36	-15.9%	2
Accounting Assistant IV	\$24.02	\$35.11	\$26.03	-8.4%	\$36.60	-4.2%	6	\$27.82	-15.8%	\$39.20	-11.6%	2
Administrative Assistant I	\$18.88	\$27.15	\$19.96	-5.7%	\$29.57	-8.9%	12	\$22.93	-21.5%	\$32.33	-19.1%	2
Administrative Assistant II	\$20.42	\$29.56	\$20.68	-1.3%	\$31.53	-6.6%	13	\$24.10	-18.0%	\$33.98	-15.0%	2
Administrative Assistant III	\$22.13	\$32.23	\$22.19	-0.3%	\$34.47	-7.0%	9	\$25.25	-14.1%	\$35.54	-10.3%	1
Administrative Assistant IV	\$24.02	\$35.11	\$24.47	-1.9%	\$37.16	-5.8%	7	\$26.52	-10.4%	\$37.33	-6.3%	1
Auditor II	\$27.15	\$40.07	\$41.02	-51.1%	\$64.62	-61.3%	2	\$41.02	-51.1%	\$64.62	-61.3%	2
Auditor III	\$29.56	\$43.82	\$43.26	-46.4%	\$68.00	-55.2%	2	\$43.26	-46.4%	\$68.00	-55.2%	2
Budget Analyst I	\$29.56	\$43.82	\$28.46	3.7%	\$42.71	2.5%	6	\$37.29	-26.1%	\$58.70	-34.0%	2
Budget Analyst II	\$32.23	\$47.94	\$32.75	-1.6%	\$53.13	-10.8%	3	\$41.05	-27.4%	\$64.67	-34.9%	1
Budget Analyst III	\$35.11	\$52.51	\$35.91	-2.3%	\$58.58	-11.6%	2	\$43.15	-22.9%	\$67.85	-29.2%	1
Education Programs Supervisor	\$38.34	\$57.53	\$41.67	-8.7%	\$64.36	-11.9%	4	\$49.83	-30.0%	\$78.19	-35.9%	2
Education Programs Professional	\$36.69	\$54.93	\$34.78	5.2%	\$52.18	5.0%	5	\$41.06	-11.9%	\$64.73	-17.8%	2
Education Programs Director	\$40.07	\$60.23	\$46.51	-16.1%	\$70.47	-17.0%	6	\$57.72	-44.0%	\$90.46	-50.2%	2
Education Licensing Analyst I	\$28.38	\$41.94	\$31.69	-11.6%	\$50.41	-20.2%	5	\$40.99	-44.4%	\$64.62	-54.1%	2
Educator Licensing Analyst II	\$30.85	\$45.80	\$37.20	-20.6%	\$58.97	-28.8%	2	\$43.15	-39.9%	\$67.85	-48.1%	1
Executive Assistant	\$26.07	\$38.34	\$26.28	-0.8%	\$40.56	-5.8%	8	\$30.71	-17.8%	\$43.28	-12.9%	2
IT Professional I	\$30.85	\$45.80	\$27.90	9.6%	\$38.97	14.9%	8	\$32.25	-4.5%	\$45.45	0.8%	2
IT Professional II	\$35.11	\$52.15	\$30.96	11.8%	\$42.32	18.8%	6	\$39.18	-11.6%	\$61.72	-18.4%	2
IT Professional III	\$38.34	\$57.53	\$36.15	5.7%	\$52.21	9.2%	5	\$41.09	-7.2%	\$64.73	-12.5%	2
IT Professional IV	\$41.94	\$63.08	\$37.03	11.7%	\$52.79	16.3%	6	\$43.22	-3.0%	\$67.93	-7.7%	2
Management Analyst I	\$28.38	\$41.94	\$30.45	-7.3%	\$43.84	-4.5%	6	\$37.29	-31.4%	\$58.75	-40.1%	2
Management Analyst II	\$30.85	\$45.80	\$32.09	-4.0%	\$47.78	-4.3%	5	\$39.14	-26.9%	\$61.70	-34.7%	2
Management Analyst III	\$33.66	\$50.15	\$38.22	-13.5%	\$55.56	-10.8%	3	\$41.05	-21.9%	\$64.67	-29.0%	1
Management Analyst IV	\$36.69	\$54.93	\$39.31	-7.1%	\$58.12	-5.8%	4	\$43.15	-17.6%	\$67.85	-23.5%	1
Program Officer I	\$26.07	\$38.34	\$24.03	7.8%	\$31.34	18.3%	7	\$30.65	-17.6%	\$43.17	-12.6%	2
Program Officer II	\$28.38	\$41.94	\$30.69	-8.1%	\$41.99	-0.1%	4	\$33.82	-19.2%	\$47.62	-13.5%	2
Program Officer III	\$30.85	\$45.80	\$31.09	-0.8%	\$43.27	5.5%	4	\$39.11	-26.8%	\$55.10	-20.3%	2
OVERALL AVERAGE				-5.5%		-7.0%			-21.9%		-24.2%	

Source: Compiled by Public Works LLC from salary schedules and data provided by the LEAs, December 2024.

EXHIBIT 1-9
SALARY COMPARISONS
LEADERSHIP CLASSIFICATIONS

	State	Large (Average)				Small (Average)				All (Average)			
	Actual	Min	Max	Actual	Actual % Diff	Min	Max	Actual	Actual % Diff	Min	Max	Actual	Actual % Diff
Chief Strategy Officer	\$131,718	\$139,116	\$217,824	N/A	N/A1	\$108,010	\$159,471	\$135,426	-2.8%	\$114,231	\$171,141	\$135,426	-2.8%
Dep Supt Admin/ Fiscal Svcs	\$151,902	\$153,572	\$240,401	\$233,655	-53.8%	\$108,720	\$159,271	\$137,525	9.5%	\$117,744	\$175,594	\$137,765	9.3%
Dep Supt Inst/ Rsrch/Eval	\$151,902	\$153,407	\$240,146	\$212,411	-39.8%	\$108,010	\$159,471	\$136,673	10.0%	\$117,162	\$175,735	\$136,824	9.9%
Dir Safe & Respect Learning	\$124,088	\$84,867	\$119,609	\$175,547	-41.5%	\$100,556	\$145,560	\$108,356	12.7%	\$97,924	\$141,206	\$108,580	12.5%
Supt Of Public Instruction	\$180,534*	\$350,000	\$400,000	\$319,604	-77.0%	\$108,010	N/A	\$173,303	4.0%	\$350,000	\$400,000	\$186,711	-3.4%
OVERALL AVERAGE					-53.0%				6.7%				5.1%

Source: Compiled by Public Works LLC from salary schedules and data provided by the LEAs, December 2024.

*Includes the PERS employee portion of the Superintendent's salary that is paid by the state.

Conclusions – 30-Non-Leadership Positions:

- Minimum NDE salary levels in comparison to all LEAs are, on average, 5.5 percent lower; at the maximum level, NDE salaries are 7.0 percent lower.
- In comparison to the Large LEAs salaries, NDE salaries are, on average, 21.9 percent lower at the minimum level and 24.2 percent lower at the maximum level.
- No positions within the Large LEA group were paid less than NDE.

Conclusions – Leadership Positions

- The Small LEAs compensate their leadership positions lower than Large LEAs and NDE in general.
- Large LEAs pay the listed leadership positions an average of 53.0 percent more than NDE.
- The Large LEAs pay their superintendents 77.0 percent more than NDE’s Superintendent.

Benefits Study

Public Employees Benefits Program

The Public Employees’ Benefits Program (PEBP) administers a group health and life insurance program which offers comprehensive medical, prescription drug, dental, vision, and life insurance. The PEBP Board consists of 10 members appointed by the Governor, including an Executive Officer who directs the program and serves at the pleasure of the Board.

The premium rates for active state employees for plan year July 1, 2024, through June 30, 2025, are shown in **Exhibit 1-10**.

EXHIBIT 1-10
PREMIUM RATES
JULY 1, 2024, TO JUNE 30, 2025

Active State Employee Rates									
Monthly Rates Effective July 1, 2024 - June 30, 2025	Nationwide PPO			Nationwide PPO			Statewide EPO/HMO		
	Consumer Driven Health Plan (CDHP-PPO)			Low Deductible (LD-PPO)			Exclusive Provider Organization Plan (EPO) and Health Plan of Nevada (HPN – HMO)		
	Unsubsidized Rate	*Base Subsidy	Participant Premium	Unsubsidized Rate	*Base Subsidy	Participant Premium	Unsubsidized Rate	*Base Subsidy	Participant Premium
Employee Only	\$714.88	\$651.32	\$55.26	\$753.70	\$651.32	\$85.26	\$852.80	\$651.32	\$181.24
Employee + Spouse/DP	\$1,415.07	\$1,123.53	\$271.27	\$1,492.73	\$1,123.53	\$331.28	\$1,690.93	\$1,123.53	\$523.25
Employee + Child(ren)	\$977.46	\$828.40	\$136.26	\$1,030.84	\$828.40	\$177.52	\$1,167.10	\$828.40	\$309.50
Employee + Family	\$1,677.64	\$1,300.60	\$352.28	\$1,769.86	\$1,300.60	\$423.54	\$2,005.22	\$1,300.60	\$651.51

Source: Public Employees’ Benefits Program, November 2024.

As shown in **Exhibit 1-11**, the majority of school districts pay 100 percent of the health care premiums for employees. The Clark County and Lyon County School Districts offer an optional plan with higher benefits for which the employee pays a portion of the premiums. Like the state, employees in all districts that responded paid a portion of the premiums for dependent coverage.

EXHIBIT 1-11
LEA EMPLOYEE PAID HEALTH CARE PREMIUMS

Target	Monthly Employee Only Health Coverage	
	Minimum Paid by the Employee	Maximum Paid by the Employee
Carson City School District	\$0.00	\$0.00
Churchill County School District	No Response	No Response
Clark County School District	\$0.00	\$160.65
Douglas County School District	\$0.00	\$0.00
Elko County School District	\$0.00	\$0.00
Esmeralda County School District	No Response	No Response
Eureka County School District	\$0.00	\$0.00
Humboldt County School District	\$0.00	\$0.00
Lander County School District	\$0.00	\$0.00
Lincoln County School District	\$0.00	\$0.00
Lyon County School District	\$0.00	\$125.86
Mineral County School District	\$0.00	\$0.00
Nye County School District	\$0.00	\$0.00
Pershing County School District	\$0.00	\$0.00
Storey County School District	\$0.00	\$0.00
Washoe County School District	\$0.00	\$0.00
White Pine County School District	\$0.00	\$0.00

Source: Compiled by Public Works, LLC from district-provided data, November 2024.

Public Employees' Retirement System of Nevada

Nevada state employees voluntarily choose to participate in either of the two plans: the **Employer Paid Contribution Plan** or the **Employee/Employer Paid Contribution Plan**. Under the Employer Paid Contribution (EPC) plan, the employer pays the total Public Employees Retirement System (PERS) contribution on the employee's behalf. This contribution is based on the employee's adjusted gross salary. However, these contributions are not deposited to the employee's individual member account and are not available for refund upon termination of employment.

Under the Employee/Employer Paid Contribution Plan, the employee and the employer share equally in the contribution to PERS.

The advantage of the employee/employer paid contribution plan is that, even though the take-home pay (after income tax withholding) is slightly less, in the event of termination, the employee contributions would be refundable without interest.

If a member chooses the employee/employer paid contribution plan, they can elect, at a future date, to contribute under the employer paid contribution plan. However, the choice of the employer paid contribution plan is a one-time election, which cannot be reversed. The amount of any future retirement benefits will be identical under either contribution plan.

Exhibit 1-12 shows the state of Nevada and the Nevada school districts that are choice employers, where the employee can select which plan they prefer, versus those that are non-choice, where the employer pays 100 percent of the PERS. As shown, the Washoe County School District offers the choice to support staff but not to teachers.

EXHIBIT 1-12
CHOICE VERSUS NON-CHOICE EMPLOYERS

Organization	Choice versus Non-Choice
State of Nevada	Choice
Carson City School District	Non-Choice
Churchill County	Non-Choice
Clark County School District	Non-Choice
Douglas County School District	Choice
Elko County School District	Choice
Esmeralda County School District	Non-Choice
Eureka County School District	Non-Choice
Humboldt County School District	Non-Choice
Lander County School District	Non-Choice
Lincoln County School District	Non-Choice
Lyon County School District	Choice
Mineral County School District	Non-Choice
Nye County School District	Non-Choice
Pershing County School District	Non-Choice
Storey County School District	Non-Choice
Washoe County School District	Support= Choice; Teachers = Non-Choice
White Pine County School District	Choice

Source: Public Employees Retirement System, November 2024.

Exhibit 1-13 provides the contribution rates since July 1, 2007. As shown, the contribution rates have increased by more than 66 percent over the last 17 years.

EXHIBIT 1-13
EMPLOYEE AND EMPLOYER CONTRIBUTION RATES

Fiscal Year End	Employer/Employee Contribution Rate	Employer Paid Contribution Rate
07/01/2007 to 06/30/2009	10.5%	20.50%
07/01/2009 to 06/30/2011	11.25%	21.50%
07/01/2011 to 06/30/2013	12.25%	23.75%
07/01/2013 to 06/30/2015	13.25%	25.75%
07/01/2015 to 06/30/2019	14.50%	28.00%
07/01/2019 to 06/30/2021	15.25%	29.25%
07/01/2021 to 06/30/2023	15.50%	29.75%
07/01/2023 to present	17.50%	33.50%

Source: Public Employees Retirement System, November 2024.

Both NDE and LEA survey results confirm that low compensation at the NDE is problematic.

The following are some of the open-ended comments from the LEA survey:

- *There are pockets of excellence within NDE. However, departments appear to work in silos and not effectively communicate with each other. Compensation is so low that experienced personnel are better served working in a school district.*

- *I believe that NDE needs to increase salaries and training opportunities for their internal staff. When they attract strong talent, they are often stolen by Districts that pay more and have better working environments.*
- *I do think the salaries provided at NDE are well below market. This must make it extremely difficult to find great staff and be competitive. All to say the capacity is not there because the salaries and benefits can't compete with other organizations. Positions are left unfilled forever.*

In the NDE survey, respondents were asked to list the top three reasons why they believe there is such a high turnover at NDE. **Exhibit 1-14** shows the responses. As shown, 39.53 percent of respondents stated low and/or modest salary as one of the key reasons for NDE staff turnover.

EXHIBIT 1-14 NDE STAFF SURVEY EXCERPT ON REASONS FOR HIGH NDE STAFF TURNOVER

In your opinion, please choose the top three reasons that contribute towards staff turn-over at NDE.

Answered: 107 Skipped: 2



Source: Public Works LLC, NDE Staff Survey Results, 2024.

Conclusion

In terms of market competition, NDE is at a serious competitive disadvantage:

- Salaries paid by the Large LEAs for positions requiring the same levels of education and experience are generally higher than those paid by the state.
- Most of the LEAs pay the employee and employer portions of the PERS contribution on top of paying higher salaries, which means that the total compensation package is significantly higher.
- The LEAs pay 100 percent of the employee-only healthcare premiums, whereas the state requires all employees to pay some portion of the healthcare premiums.

RECOMMENDATION 1-3:

Work with the Legislature and the agencies involved in the NDE total compensation packages to ensure that the salaries and benefits are competitive with those offered in the school districts.

NDE should provide the state officials who are working with the current classification study this information and encourage them to consider salary and benefit modifications in their final recommendations to the Legislature.

FISCAL IMPACT

The final cost for salary and benefit enhancements are dependent on the state's discretion and cannot be estimated at this time.

NDE'S EXCESSIVE TURNOVER RATE

FINDING

Over the last seven years, NDE has had an excessively high turnover rate averaging 33.4 percent which disrupts operations and effectiveness.

Exhibit 1-15 provides the data on turnover by position from 2017-18 through 2023-24. Based on an analysis of the totals and most frequently turned-over positions, a summary includes:

- Highest Turnover Positions:
 - Education Programs Professional: 102 instances (24.2% of total turnover)
 - Administrative Assistant III: 70 instances (16.6% of total turnover)
 - Management Analyst II: 24 instances (5.7% of total turnover)
 - Education Programs Supervisor: 21 instances (5.0% of total turnover)
- Overall Turnover Rate:
 - The turnover percentage varies year-to-year, with the highest in FY2022 at 46.4 percent and the lowest in FY2021 at 22.4 percent.
 - The average turnover rate across the years shown is approximately 33.4 percent.
- Trends:
 - There was a notable spike in turnover in FY2022, with 83 departures (46.4% turnover rate), which could indicate an event or policy change leading to higher exits that year.

Analysis and Implications

- High Turnover in Education Programs Roles:
 - The Education Programs Professional and Education Programs Supervisor positions collectively account for nearly 30 percent of the total turnover. High turnover in these roles may disrupt program continuity, impacting the quality and consistency of educational programs across the state.
 - Reasons for turnover could include job stress, compensation issues, or external opportunities. Addressing retention in these key roles is essential for NDE's program stability and long-term success.

- Administrative Support Staff Turnover:
 - The high turnover in Administrative Assistant III roles suggests challenges in retaining support staff, which could affect administrative efficiency and increase workloads for remaining staff. This may result in delays in administrative tasks, impacting the department's day-to-day operations.
- Management Analyst Turnover:
 - Positions like Management Analyst II and other similar roles (III, IV) show consistent turnover, albeit lower in number compared to the top positions. Since these roles likely support decision-making and strategic planning, turnover here could impact data-driven policy decisions and slow down strategic initiatives.
- Year-to-Year Variability:
 - The spike in turnover in FY2022 warrants investigation. If this was due to policy shift, reorganization, or external economic factors, understanding the root cause could help the NDE better prepare for or mitigate similar spikes in the future.

EXHIBIT 1-15
NEVADA DEPARTMENT OF EDUCATION EMPLOYEES LEAVING THE DEPARTMENT
BY POSITION FY 18 TO FY 24

Position	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	Total	% of Total
Education Programs Professional	22	8	14	10	17	15	16	102	24.2%
Administrative Assistant III	9	10	14	10	11	8	8	70	16.6%
Management Analyst II	2	2	1	1	6	6	6	24	5.7%
Education Programs Supervisor	1	2	1	2	6	8	1	21	5.0%
Accounting Assistant II	1	3	2		6	2	2	16	3.8%
Grants & Projects Analyst II	4	6	3	1			1	15	3.6%
Budget Analyst II	1		1	3	3	2	1	11	2.6%
Program Officer I	1	1	3	1	3		2	11	2.6%
Auditor II			3	2	1	2	1	9	2.1%
IT Professional III	1		1		4	1	2	9	2.1%
Dep Supt Inst/Rsrc/Eval (EA)		3			1	2	2	8	1.9%
Education Programs Director			1	1	1	3	2	8	1.9%
Accounting Assistant III		1	1	1	2		1	6	1.4%
Admin Services Officer III			3		3			6	1.4%
Administrative Assistant IV	1	1	1	1		1	1	6	1.4%
Business Process Analyst II	1	1	1		3			6	1.4%
Education & Information Officer	1	1	1			1	2	6	1.4%
Executive Assistant	1	1	1		1	1	1	6	1.4%
Management Analyst I		1		1	2	1	1	6	1.4%
Chief Strategy Officer, EDU					1	3	1	5	1.2%
Dep Supt Admin / Fiscal Svcs		1				3		4	0.9%
IT Professional IV	2	1				1		4	0.9%
Program Officer II			1	1	1	1		4	0.9%
Public Information Officer II			1	1	1		1	4	0.9%
Auditor III			2		1			3	0.7%
Budget Analyst I		1			1	1		3	0.7%
Budget Analyst III			1		1	1		3	0.7%

Efficiency Assessment for the Nevada Department of Education

Position	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	Total	% of Total
Clerical Trainee	1	1		1				3	0.7%
Compliance Investigator II					1	2		3	0.7%
Dir Safe & Respect Learning	1					2		3	0.7%
Educator Licensing Analyst I		1	1		1			3	0.7%
Fiscal/Business Professional Trainee III	1		1			1		3	0.7%
Management Analyst III	1				2			3	0.7%
Management Analyst IV						1	2	3	0.7%
Auditor I						1	1	2	0.5%
Business Process Analyst I				1			1	2	0.5%
Educator Licensure Director		1		1				2	0.5%
Grants & Projects Analyst III	1		1					2	0.5%
IT Professional II					1		1	2	0.5%
Statistician II					1	1		2	0.5%
Supt of Public Instruction		2						2	0.5%
Admin Services Officer II							1	1	0.2%
Administrative Assistant I		1						1	0.2%
Business Process Analyst III					1			1	0.2%
Dr, Research & Evaluation		1						1	0.2%
Grants & Projects Analyst I		1						1	0.2%
Grants & Projects Analyst Trainee	1							1	0.2%
IT Manager I							1	1	0.2%
IT Technician III						1		1	0.2%
IT Technician V						1		1	0.2%
Staff Professional Trainee			1					1	0.2%
Statistician I		1						1	0.2%
Total Leaving	54	53	61	39	83	73	59	422	100.0%
Total Authorized Positions	171	172	178	174	179	190	197		
Percent Turnover	31.6%	30.8%	34.3%	22.4%	46.4%	38.4%	29.9%		33.4%

Source: Nevada Department of Education, 2024.

Reviewing the reasons for why NDE employees leave the department is critical for understanding the problem and developing solutions. **Exhibit 1-16** provides the data for the department's employee turnover from FY 18 to FY 24. A summary of the data includes:

- Most Common Reasons:
 - Lateral Transfer: 53 instances (12.6% of total turnover)
 - Unranked List: 51 instances (12.1% of total turnover)
 - Left for Better Paying Job: 51 instances (12.1% of total turnover)
 - Personal Reasons/No Move: 49 instances (11.6% of total turnover)
 - Retirement: 45 instances (10.7% of total turnover)
- Other Notable Reasons:
 - Automatic Separation: 21 instances (5.0%)
 - Moving for Personal Reasons: 19 instances (4.5%)
 - End of Secondary Appointment and Unclassified: 9 instances each (2.1%)

- Frequency by Year:
 - The reasons for turnover were consistent throughout the reviewed years, but certain reasons like "Lateral" and "Left for Better Paying Job" appeared frequently each year.
 - There is also a notable increase in employees leaving for personal reasons, retirement, or unranked list placements in specific years, especially during FY22, which had the highest turnover.

EXHIBIT 1-16
NEVADA DEPARTMENT OF EDUCATION TURNOVER BY REASON FY 18 TO FY 24

Reason	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	Total	% Total
LATERAL	11	3	7	4	10	11	7	53	12.6%
UNRANKED LIST	9			7	18	17		51	12.1%
LEFT BETTER PAYING JOB	5	11	5	6	12	9	3	51	12.1%
PERSONAL REASON/NO MOVE	4	4	4	5	11	11	10	49	11.6%
RETIREMENT	5	5	7	9	9	4	6	45	10.7%
UNRANKED LIST		10	15				12	37	8.8%
AUTOMATIC	2	4	2	3	1	5	4	21	5.0%
MOVING FOR PERSONAL REASONS	5	3	1		5	1	4	19	4.5%
COMPARABLE	1	2	3		2	1		9	2.1%
END OF SECONDARY APPOINTMENT		1			3	4	1	9	2.1%
UNCLASSIFIED	1	1			2	4	1	9	2.1%
PROMOTIONAL TRANSFER	2	1	1	1		1		6	1.4%
VOLUNTARY DEMOTION PERMANENT	3		1	1			1	6	1.4%
TRANSFER TO PROF UNIV	1	1				2	1	5	1.2%
0	2				2			4	0.9%
DISMISSED DURING PROBATION					1	1	1	3	0.7%
RANKED LIST			2		1			3	0.7%
REAPPOINTMENT		2	1					3	0.7%
REJECT TRIAL PERIOD REVERT		1	1				1	3	0.7%
REJECT TRIAL PERIOD REVERT				2	1			3	0.7%
DISMISSED AFTER PROBATION	1				1			2	0.5%
DISSATISFACTION WITH DUTIES			1				1	2	0.5%
EMERGENCY				1	1			2	0.5%
ENTER PRIVATE BUSINESS VENTURE							2	2	0.5%
LAYOFF	1		1					2	0.5%
MASS CHANGE			2					2	0.5%
NO REASON GIVEN FOR TERM			2					2	0.5%
RETURN TO SCHOOL			1			1		2	0.5%
TRANSFER TO NCLS LEGISLATIVE					1		1	2	0.5%
BACKGROUND CHECK NO PASS			1					1	0.2%
CHANGE IN ADMINISTRATION		1						1	0.2%
CONFLICT WITH SUPERVISOR		1						1	0.2%
DISMISSED DURING						1		1	0.2%
INADEQUATE ST BENEFIT/WAGES							1	1	0.2%
LEFT BETTER PAYING JOB					1			1	0.2%
LESS THAN TWO WEEKS GIVEN		1						1	0.2%
LESS THAN TWO WEEKS GIVEN					1			1	0.2%

Reason	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	Total	% Total
PERM EMP DEMOTION TRANSFER			1					1	0.2%
RESIGNATION INLIEU OF TERM		1						1	0.2%
RET RATE GOOD OF STATE							1	1	0.2%
TRANSFER FR UNCL EXEC BRANCH							1	1	0.2%
TRANSFER TO NCLS EXEC BR			1					1	0.2%
TRANSFER TO UNCL EXEC BRANCH	1							1	0.2%
UNSATISFACTORY WORK CONDITIONS			1					1	0.2%
Total	54	53	61	39	83	73	59	422	100.0%

Source: Nevada Department of Education, 2024.

Examining the tenure of employees before they leave a public organization provides critical insights into organizational stability, employee satisfaction, and the effectiveness of retention efforts. **Exhibit 1-17** provides the average number of years that the employees at the various positions worked for NDE before leaving. A summary of the data includes:

- Average Tenure Across All Positions:
 - The average tenure of employees who leave varies by year, ranging from 4.9 years (FY 2024) to 8.8 years (FY 2020), with an overall average of about 6.9 years.
 - A recent decrease in average tenure (4.9 years in FY 2024) could suggest an increase in turnover among newer employees or a potential shift in job satisfaction or market competition.
- Roles with Short Tenures:
 - Positions such as Clerical Trainee, Chief Strategy Officer, EDU, Administrative Assistant I, and Education & Information Officer exhibit lower average tenures, often under three years.
 - Shorter tenure in these roles may indicate entry-level or transient positions where employees gain initial experience before moving on to other opportunities.
- Roles with Long Tenures:
 - Certain roles have much higher average tenures, such as IT Manager I (26.6 years), Educator Licensure Director (27.4 years), and Business Process Analyst III (27.4 years).
 - These roles often require specialized skills and experience, which may contribute to higher job stability and longer retention.
- Mid-Tenure Roles:
 - Positions like Education Programs Professional (average 4.6 years) and Administrative Assistant III (average 4.5 years) have moderate average tenures.
 - These mid-tenure roles suggest that employees may stay long enough to gain experience but eventually leave due to limited advancement or other career opportunities.

EXHIBIT 1-17

NEVADA DEPARTMENT OF EDUCATION AVERAGE LONGEVITY OF POSITION TURNOVER IN YEARS

Position	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY2 023	FY 2024	Average
Clerical Trainee	0.5	0.0		0.0				0.2
Chief Strategy Officer, EDU					2.4	2.1	0.5	1.8
Administrative Assistant I		2.4						2.4
Education & Information Officer	0.7	0.5	0.9			7.1	2.9	2.5
Accounting Assistant II	2.3	1.9	3.6		1.9	5.5	1.5	2.5
Statistician I		2.6						2.6
Dr, Research & Evaluation		2.8						2.8
Public Information Officer II			6.1	4.1	1.0		1.4	3.2
Accounting Assistant III		1.3	4.6	8.5	3.9		1.4	3.9
Budget Analyst I		9.3			0.2	4.0		4.5
Administrative Assistant III	4.8	2.9	6.5	6.0	4.1	2.3	3.5	4.5
Dir Safe & Respect Learning	0.7					6.4		4.5
Education Programs Professional	3.9	4.7	5.7	4.9	5.2	5.3	2.9	4.6
Auditor I						5.2	4.0	4.6
Executive Assistant	0.1	13.3	0.3		15.2	1.1	0.9	5.1
Supt of Public Instruction		5.5						5.5
Auditor III			6.3		5.0			5.9
Compliance Investigator II					10.6	3.5		5.9
Statistician II					5.7	6.2		5.9
Management Analyst III	8.2				4.9			6.0
Dep Supt Inst/Rsrc/Eval (EA)		11.3			2.5	1.6	5.2	6.3
Education Programs Supervisor	14.7	5.0	5.3	10.6	6.9	4.1	6.6	6.3
Education Programs Director			13.0	5.1	5.4	5.2	6.8	6.6
Auditor II			5.8	1.2	1.7	10.2	18.2	6.7
Budget Analyst II	4.8		16.4	8.4	3.7	7.0	8.5	7.3
Management Analyst II	4.7	15.5	25.5	4.3	11.1	5.6	2.5	7.7
Admin Services Officer III			10.9		5.3			8.1
Educator Licensing Analyst I		6.9	9.1		9.6			8.6
Program Officer II			25.1	0.5	0.8	8.7		8.8
Grants & Projects Analyst Trainee	8.8							8.8
Administrative Assistant IV	12.0	21.8	4.2	6.6		5.2	5.1	9.2
IT Professional II					17.6		1.0	9.3
Budget Analyst III			19.0		1.2	9.8		10.0
Management Analyst I		3.1		28.3	5.0	10.7	10.0	10.4
Staff Professional Trainee			10.4					10.4
Dep Supt Admin / Fiscal Svcs		2.8				13.2		10.6
Grants & Projects Analyst II	6.9	13.6	9.9	32.7			13.5	12.3
Admin Services Officer II							12.5	12.5
Management Analyst IV						12.1	12.8	12.6
IT Professional III	19.8		22.4		11.4	18.7	4.6	12.9
Business Process Analyst I				11.4			17.0	14.2
Program Officer I	26.7	26.4	17.4	26.2	9.4		4.0	15.3
IT Professional IV	15.9	7.1				25.1		16.0
Business Process Analyst II	13.2	24.4	14.9		17.2			17.3
Fiscal/Business Professional Trainee III	8.5		27.3			16.2		17.4

Position	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY2 023	FY 2024	Average
Grants & Projects Analyst III	24.3		10.8					17.5
IT Technician V						17.6		17.6
IT Technician III						18.4		18.4
Grants & Projects Analyst I		21.4						21.4
IT Manager I							26.6	26.6
Business Process Analyst III					27.4			27.4
Educator Licensure Director		26.6		28.2				27.4
Average number of years	6.4	7.8	8.8	8.0	6.5	6.3	4.9	6.9

Source: Nevada Department of Education, 2024.

Exhibit 1-18 shows the stated reason for leaving the department by average longevity in the position. It provides:

- Short Tenures (Under 3 Years)
 - Reasons such as Background Check No Pass (0.1 years), Dismissed During Probation (0.6 years), Conflict with Supervisor (0.6 years), and Dismissed During (0.4 years) show the shortest tenures.
 - These short tenures are often related to performance issues, fit with the role, or quick dismissals due to failing certain entry requirements.
- Moderate Tenures (3-6 Years)
 - Reasons like Lateral Moves (6.4 years), Unranked List (6.7 years), and Moving for Personal Reasons (3.7 years) fall into this range, suggesting these employees stayed long enough to gain experience but sought opportunities for advancement, changes, or had personal motivations for leaving.
 - Transfer to NCLS Legislative (3.6 years) and Personal Reasons/No Move (3.4 years) also indicate reasons that may be linked to career progression or personal circumstances.
- Long Tenures (Over 10 Years)
 - Employees who left for reasons such as Retirement (15.9 years), Transfer to Unclassified Executive Branch (14.7 years), and Automatic Termination (9.4 years) show much longer average tenures.
 - These long-tenure reasons reflect employees who may have built a career within the organization before leaving, often due to retirement or significant life changes.
- Highest Tenure Reasons
 - Reasons with the longest tenures include Retirement (15.9 years), Comparable Opportunity (14.3 years), and Mass Change (13.9 years).
 - These suggest employees leaving for these reasons are well-established, experienced individuals whose departures may be linked to external opportunities or natural career transitions, such as retirement.

EXHIBIT 1-18
AVERAGE LONGEVITY OF TURNOVER BY REASON FOR TURNOVER IN YEARS

Reason	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	Average
BACKGROUND CHECK NO PASS			0.1					0.1
DISMISSED DURING						0.4		0.4
CONFLICT WITH SUPERVISOR		0.6						0.6
DISMISSED DURING PROBATION					0.2	0.9	0.8	0.6
LESS THAN TWO WEEKS GIVEN		1.6						1.6
NO REASON GIVEN FOR TERM			1.8					1.8
ENTER PRIVATE BUSINESS VENTURE							1.9	1.9
LEFT BETTER PAYING JOBPRIV	0.9				2.2	4.2	1.5	2.7
PROMOTIONAL TRANSFER	1.4	2.8	6.2	4.1		1.0		2.8
LEFT BETTER PAYING JOBPUB	2.1			2.5	3.3	2.9		2.8
PERSONAL REASON/NO MOVE	1.7	1.2	6.9	3.2	4.3	3.8	2.0	3.4
TRANSFER FR UNCL EXEC BRANCH							3.4	3.4
PERM EMP DEMOTION TRANSFER			3.6					3.6
TRANSFER TO NCLS LEGISLATIVE					1.0		6.3	3.6
REJECT TRIAL PERIOD REVERT				4.2	2.6			3.7
MOVING FOR PERSONAL REASONS	2.4	8.2	5.2		2.9	0.8	3.1	3.7
LAYOFF	4.8		2.7					3.8
LEFT BETTER PAYING JOB PUB		4.6	2.7				1.0	3.9
0	0.9				8.1			4.5
UNCLASSIFIED	12.1	0.4			3.9	3.7	7.1	4.7
INADEQUATE ST BENEFIT/WAGES							4.9	4.9
RESIGNATION INLIEU OF TERM		5.0						5.0
LESS THAN TWO WEEKSGIVEN					5.0			5.0
TRANSFER TO PROF UNIV	13.2	2.8				4.0	1.4	5.1
EMERGENCY				6.7	5.0			5.8
TRANSFER TO NCLS EXEC BR			6.1					6.1
UNRANKED LIST	4.2			5.4	7.3	6.5		6.2
LATERAL	9.4	3.9	4.6	2.4	7.3	8.1	2.7	6.4
UNRANKED LIST		8.6	6.7				5.1	6.7
END OF SECONDARY APPOINTMENT		26.6			5.7	5.0	3.4	7.5
DISMISSED AFTER PROBATION	11.5				3.7			7.6
UNSATISFACTORY WORK CONDITIONS			8.4					8.4
RETURN TO SCHOOL			14.9			3.0		8.9
AUTOMATIC	4.5	3.6	18.9	13.2	7.6	8.5	11.4	9.4
VOLUNTARY DEMOTION PERMANENT	11.3		13.0	6.1			10.0	10.5
CHANGE IN ADMINISTRATION		10.7						10.7
REAPPOINTMENT		14.1	5.2					11.1
REJECT TRIAL PERIOD REVERT		7.1	16.4				12.5	12.0
DISSATISFACTION WITH DUTIES			21.1				3.6	12.4
RANKED LIST			14.9		7.4			12.4
LEFT BETTER PAYING JOB					13.1			13.1
RET RATE GOOD OF STATE							13.5	13.5
MASS CHANGE			13.9					13.9
COMPARABLE	8.2	25.4	10.3		15.2	8.7		14.3

Reason	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	Average
TRANSFER TO UNCL EXEC BRANCH	14.7							14.7
RETIREMENT	12.8	16.8	18.8	18.8	13.7	21.3	9.8	15.9
Average number of years	6.4	7.8	8.8	8.0	6.5	6.3	4.9	6.9

Source: Nevada Department of Education, 2024.

In addition to the data above, the problem of employee turnover was a significant topic in interviews, focus groups, and survey responses.

While turnover data were not available for the comparison departments of education, data for three of the state governments may be illustrative. As of 2023, the average turnover rate for Arkansas state employees was approximately 18 percent. This figure aligns with the general turnover rate for government employees across various states in the U.S. over the past few years. Factors contributing to this include competitive pressures from the private sector, challenges in offering flexible work arrangements, and the need for better compensation and working conditions.

The average turnover rate for Oregon state employees is around 19 percent, contributing to a significant number of vacancies and operational challenges across various state agencies.

As of 2023, Utah state employee turnover rates varied by sector, with specific areas facing significant challenges. For instance, sectors like direct care, particularly in agencies like the Utah State Hospital, have experienced turnover rates as high as 76 percent. Overall, the average turnover rate for state employees was reported to be about 19 percent, with some agencies seeing even higher rates due to factors like burnout, competitive labor markets, and wage issues.

Two states provided employee information that allowed for analysis of the longevity of their workforces. At the Arkansas Department of Elementary and Secondary Education, 49 of 558 employees (8.7% of the entire staff) were in the department less than one year. The Oregon Department of Education currently has 12.3 percent of its employees with less than one year of experience with the department.

High employee turnover at NDE is a significant issue, impacting both the department's functioning and the school districts it serves. This issue poses a problem for both entities, supported by research and industry sources, identified as follows:

- Loss of Institutional Knowledge
 - Impact on the NDE: High turnover leads to a continuous loss of institutional knowledge, especially among experienced staff members who understand complex state and federal education policies, funding mechanisms, and local district needs. As staff members leave, they take with them insights that are difficult to replace, making it harder for the NDE to maintain continuity in its work.
 - Impact on School Districts: School districts rely on the NDE for guidance, training, and support. High turnover can lead to inconsistent communication, delays in critical decisions, and a lack of support, as new NDE employees may need time to become familiar with processes and relationships with districts. This can create frustration and reduce the NDE's effectiveness in providing timely assistance to schools.

- Supporting Source: According to a report by the Society for Human Resource Management (SHRM), high turnover disrupts continuity, leading to gaps in knowledge and skill within organizations, which in turn affects productivity and service quality.²
- Decreased Productivity and Efficiency
 - Impact on the NDE: When turnover is high, the NDE must frequently divert resources to recruit, hire, and train new staff members. This can be costly and time-consuming, reducing the department's capacity to focus on strategic initiatives and projects that benefit school districts.
 - Impact on School Districts: School districts depend on efficient NDE processes for timely funding, compliance oversight, and program support. Delays in these areas due to turnover-related productivity issues at the NDE can disrupt school operations, hindering districts' ability to implement programs and comply with regulations.
 - Supporting Source: A study by Hinkin and Tracey (2000) in the *Journal of Applied Psychology* indicates that turnover reduces organizational productivity, as new employees require time to reach the performance level of their predecessors, thus straining the entire organization's efficiency.³
- Strained Relationships with Districts and Reduced Trust
 - Impact on the NDE: High turnover can damage the relationships the NDE has cultivated with district leaders, superintendents, and principals. Relationships are foundational in building trust and collaborative support, and frequent staff changes can disrupt these relationships, leading to a lack of cohesion between the NDE and the districts it serves.
 - Impact on School Districts: District leaders may feel frustrated or unsupported if they must constantly engage with new NDE staff who lack an understanding of their specific needs and context. This inconsistency can reduce trust in the NDE's ability to provide reliable support, affecting district morale and cooperation.
 - Supporting Source: Public Administration Review highlights that turnover in public organizations, especially in roles involving external relationships, negatively impacts service users' trust and satisfaction, as new staff may lack the rapport and contextual understanding that their predecessors had.⁴
- Disruption in Policy Implementation and Program Continuity
 - Impact on the NDE: High turnover disrupts policy implementation and program management within the NDE. Frequent staffing changes can lead to inconsistencies in how policies are interpreted, monitored, and enforced, leading to confusion within the department and among the districts it serves.
 - Impact on School Districts: School districts depend on the NDE to guide them in implementing state and federal mandates and education reforms. High turnover can create

² SHRM. (2016). *The Real Cost of Turnover in Public Sector Organizations*. Society for Human Resource Management.

³ Hinkin, T. R., & Tracey, J. B. (2000). *The cost of turnover in public organizations: An applied study*. *Journal of Applied Psychology*, 85(1), 121-131.

⁴ Selden, S. C., & Sowa, J. E. (2004). *Examining the Trust Gap in Public Sector Service Organizations*. *Public Administration Review*, 64(4), 398-408.

- gaps in program continuity, resulting in inconsistent support for district initiatives, delayed program rollouts, and potential non-compliance issues if new NDE staff lack the experience to provide accurate guidance.
- Supporting Source: According to The American Association of School Administrators (AASA), stable leadership is essential for effective policy implementation and educational reform. Turnover can undermine program consistency, confusing educators and reducing the likelihood of successful implementation.⁵
 - Increased Costs and Resource Allocation Challenges
 - Impact on the NDE: High turnover incurs financial costs due to recruitment, hiring, and training processes. This strain on resources can limit the department's ability to allocate funds to other essential areas, potentially impacting educational initiatives and support programs for districts.
 - Impact on School Districts: When resources are funneled toward turnover costs rather than program support, school districts may experience decreased funding or support for initiatives that are crucial to improving educational outcomes. This can lead to a negative impact on school improvement efforts and resource allocation at the district level.
 - Supporting Source: A report by The National Council on Teacher Quality (NCTQ) found that turnover in educational administration increases operational costs, reduces available funding for programs, and ultimately impacts student outcomes by shifting resources away from instructional support.⁶
 - Impact on Employee Morale and Departmental Culture
 - Impact on the NDE: High turnover can lead to low morale among remaining NDE employees, especially if they are overburdened by the responsibilities of vacant positions. It can also result in a negative workplace culture, where employees feel insecure about job stability and less committed to long-term goals.
 - Impact on School Districts: Low morale within the NDE can reduce the quality of interactions and responsiveness to district needs. A disengaged NDE workforce is less likely to provide proactive, high-quality support to school districts, impacting the districts' morale and potentially diminishing their confidence in the NDE.
 - Supporting Source: The International Journal of Public Sector Management highlights that turnover affects morale in public sector organizations, particularly when remaining staff feel undervalued and overworked, leading to a decline in service quality.⁷

In summary, high turnover at NDE hinders the department's productivity, disrupts its relationships with districts, and ultimately impacts the quality of education by limiting the support available to schools. Addressing turnover is crucial to maintaining effective operations, fostering positive relationships with school districts, and achieving long-term educational goals.

⁵ AASA. (2018). *The Importance of Stable Leadership in Public Education*. American Association of School Administrators.

⁶ National Council on Teacher Quality (NCTQ). (2017). *Administrative Turnover Costs and Its Impact on Public Education*.

⁷ Wells, T. (2012). *Employee Morale in Public Sector Organizations Facing High Turnover Rates*. *International Journal of Public Sector Management*, 25(6), 508-520.

RECOMMENDATION 1-4:

NDE should develop and vigorously implement a plan to address the impact of employee turnover.

To address high employee turnover, NDE can implement a comprehensive strategy that focuses on recruitment, employee engagement, career development, and retention practices. Below are key elements and steps that the NDE should pursue, supported by industry research and best practices. The proposed HR Liaison should lead this effort.

1. Conduct a Turnover Analysis and Identify Root Causes

- **Steps:**
 - Analyze turnover data to identify trends in specific roles, tenure, departments, or demographics.
 - Conduct exit interviews and employee surveys to gather qualitative insights into why employees are leaving.
 - Engage an external consultant if necessary to perform an in-depth organizational audit.
- **Supporting Source:** According to **Holtom et al. (2008)** in the *Journal of Management*, understanding the root causes of turnover through data analysis and qualitative feedback is essential for developing targeted retention strategies.⁸

2. Improve Recruitment and Onboarding Practices

- **Steps:**
 - Refine recruitment processes to attract candidates who align with the NDE's mission and organizational culture.
 - Implement realistic job previews during interviews to manage candidate expectations and reduce early turnover.
 - Develop a structured onboarding program that includes mentorship, role-specific training, and regular check-ins during the first year.
- **Supporting Source:** The **Society for Human Resource Management (SHRM)** emphasizes that effective onboarding significantly increases new hire retention by helping employees understand their role and integrate into the organization.⁹

3. Enhance Compensation and Benefits Packages

- **Steps:**
 - Conduct a market analysis to ensure salaries and benefits are competitive with similar organizations.
 - Offer benefits that support work-life balance, such as flexible work hours, remote work options, and health and wellness programs.

⁸ Holtom, B. C., Mitchell, T. R., Lee, T. W., & Eberly, M. B. (2008). *Turnover and Retention Research: A Summary of Findings and Best Practices*. *Journal of Management*, 34(3), 235-272.

⁹ Society for Human Resource Management (SHRM). (2020). *Onboarding Key to Retention*.

- Develop a transparent compensation policy, so employees understand how their pay aligns with market rates and performance.
- **Supporting Source:** Research from **Glassdoor (2017)** indicates that competitive pay and benefits are among the top factors employees consider when deciding to stay with an employer, especially in high-turnover industries.¹⁰

4. Foster a Positive Organizational Culture and Work Environment

- **Steps:**
 - Promote a collaborative, supportive, and inclusive culture through team-building activities, regular communication, and leadership accessibility.
 - Recognize employee achievements and contributions regularly to foster a sense of appreciation and belonging.
 - Encourage open communication where employees feel safe to express concerns, ideas, and feedback.
- **Supporting Source:** A study published in the *Harvard Business Review* shows that a positive workplace culture is closely tied to employee retention, as employees are more likely to stay when they feel valued and supported.¹¹

5. Provide Opportunities for Career Development and Advancement

- **Steps:**
 - Implement career development programs that offer employees access to professional development, training, and mentorship opportunities.
 - Create clear career progression paths and communicate these to employees so they understand potential opportunities for growth within the NDE.
 - Offer tuition reimbursement or sponsorship for certifications that align with the department's needs, which can enhance skill sets and improve job satisfaction.
- **Supporting Source:** According to **LinkedIn's Workforce Learning Report (2018)**, 94 percent of employees would stay longer at a company if it invested in their career development, highlighting the impact of growth opportunities on retention.¹²

6. Build a Strong Leadership and Management Team

- **Steps:**
 - Train managers to be effective leaders, focusing on skills like empathy, communication, and conflict resolution.
 - Ensure managers conduct regular check-ins and performance reviews, offering constructive feedback and support.
 - Develop leadership pathways within the organization to retain talented employees who may leave for leadership opportunities elsewhere.

¹⁰ Glassdoor. (2017). *The Impact of Compensation on Employee Retention*.

¹¹ Goler, L., Gale, J., Harrington, B., & Grant, A. (2018). *Why People Really Quit Their Jobs*. *Harvard Business Review*.

¹² LinkedIn. (2018). *Workforce Learning Report: Employee Training and Development*.

- **Supporting Source:** The **Gallup State of the American Workplace Report** shows that managers account for at least 70 percent of the variance in employee engagement scores, indicating that effective leadership is crucial to employee retention.¹³

7. Offer Flexible Work Arrangements and Promote Work-Life Balance (if allowed and appropriate)

- **Steps:**
 - Provide flexible work options, including remote work or flexible schedules, to accommodate different employee needs.
 - Encourage a healthy work-life balance by discouraging after-hours work and setting boundaries around work expectations.
 - Implement wellness programs to support physical and mental health, such as access to counseling, fitness memberships, or wellness days.
- **Supporting Source:** A survey by the **American Psychological Association (APA)** found that flexible work arrangements reduce stress and increase job satisfaction, which are key factors in employee retention.¹⁴

8. Establish a Structured Employee Recognition Program

- **Steps:**
 - Create a formal recognition program to acknowledge employee accomplishments and contributions on a regular basis.
 - Include both formal rewards (e.g., bonuses, awards) and informal recognition (e.g., shout-outs in meetings, thank-you notes) to show appreciation.
 - Align recognition with organizational values and goals, making sure employees feel that their contributions support the DOE's mission.
- **Supporting Source:** Research by **Bersin by Deloitte (2012)** found that companies with effective recognition programs have 31 percent lower voluntary turnover rates, as employees feel valued and appreciated.¹⁵

9. Implement Succession Planning

- **Steps:**
 - Identify key roles that are critical to the department's functioning and develop succession plans for these positions.
 - Provide cross-training to ensure that multiple employees are capable of performing essential functions, reducing disruption from sudden departures.
 - Engage senior employees in mentoring roles to transfer knowledge to less experienced staff, ensuring continuity.

¹³ Gallup. (2017). *State of the American Workplace Report*.

¹⁴ American Psychological Association (APA). (2017). *Work-Life Balance and Employee Retention: The Impact of Flexibility on Job Satisfaction*.

¹⁵ Bersin by Deloitte. (2012). *The State of Employee Recognition*. Bersin & Associates.

- **Supporting Source:** The **National Association of State Personnel Executives (NASPE)** emphasizes the importance of succession planning in public sector agencies to maintain operational stability in the face of turnover.¹⁶

10. Monitor and Continuously Improve Retention Strategies

- **Steps:**
 - Regularly review turnover metrics and conduct pulse surveys to gauge employee satisfaction and engagement.
 - Adapt retention strategies based on feedback and emerging trends, remaining responsive to changing workforce needs.
 - Set retention goals and measure the effectiveness of implemented strategies, adjusting as necessary to ensure continuous improvement.
- **Supporting Source:** The **Society for Industrial and Organizational Psychology (SIOP)** recommends a continuous feedback loop for retention initiatives to ensure that strategies are effective and aligned with employee needs (SIOP, 2020).¹⁷

By following these steps, NDE can create a supportive and engaging work environment, reduce turnover, and build a stable workforce that better serves school districts across the state.

Creating and implementing a comprehensive plan to address high employee turnover at the NDE requires a phased approach, with each phase focused on specific actions. A suggested timeline spanning 12-18 months is provided below:

Phase 1: Assessment and Planning (Months 1-3)

1. **Conduct a Turnover Analysis (Months 1-2)**
 - Review turnover data to identify trends and root causes.
 - Conduct exit interviews and distribute employee satisfaction surveys to understand key drivers of turnover.
2. **Set Goals and Define Metrics (Month 2)**
 - Based on findings, set measurable retention goals (e.g., reduce turnover by X% in specific roles or departments).
 - Define metrics for evaluating success, such as employee satisfaction scores, turnover rates, and average tenure.
3. **Develop a Retention Strategy (Month 3)**
 - Create a detailed plan addressing recruitment, onboarding, compensation, culture, career development, and leadership training.
 - Secure leadership buy-in and budget approval to ensure support and resources.

¹⁶ National Association of State Personnel Executives (NASPE). (2018). *Succession Planning for Public Sector Agencies*.

¹⁷ Society for Industrial and Organizational Psychology (SIOP). (2020). *Continuous Improvement in Employee Retention Strategies*.

Phase 2: Quick-Win Initiatives (Months 3-6)

1. Enhance Onboarding and Orientation (Months 3-4)

- Revamp onboarding processes with improved orientation, role-specific training, and mentorship for new hires.
- Begin assigning mentors to new employees for support and guidance.

2. Implement Employee Recognition Program (Months 3-5)

- Launch a formal recognition program to acknowledge achievements, boost morale, and foster a sense of belonging.
- Start with regular team shout-outs, milestone awards, and other forms of public recognition.

3. Initiate Exit and Stay Interviews (Months 3-4)

- Standardize exit interviews for departing employees and introduce stay interviews for current employees to better understand retention needs.
- Use feedback from these interviews to inform ongoing adjustments to the plan.

Phase 3: Recruitment and Compensation Improvements (Months 6-9)

1. Refine Recruitment Strategies (Months 6-7)

- Develop clearer job descriptions and realistic job previews to align candidate expectations with actual job requirements.
- Ensure recruitment practices attract candidates with a strong fit for NDE's mission and culture.

2. Review and Adjust Compensation (Months 7-9)

- Conduct a compensation study to benchmark salaries against comparable roles in the region.
- Adjust compensation where possible to ensure competitive pay and benefits, especially for high-turnover roles.

Phase 4: Culture and Development Initiatives (Months 9-12)

1. Enhance Workplace Culture (Months 9-11)

- Organize team-building events, foster regular communication, and provide forums for open feedback.
- Create a culture committee or task force to continuously improve workplace culture based on employee input.

2. Implement Career Development Programs (Months 10-12)

- Launch professional development opportunities, such as skills training, workshops, and access to educational resources.
- Develop career pathways and communicate advancement opportunities to employees.

3. Establish Flexible Work Policies (Months 10-12)

- Introduce flexible work arrangements, such as remote work, flexible hours, or compressed work weeks, where feasible.
- Promote work-life balance to improve employee satisfaction and retention.

Phase 5: Leadership Training and Succession Planning (Months 12-15)

1. Train Managers in Retention and Engagement (Months 12-14)

- Offer management training programs focused on engagement, empathy, communication, and retention strategies.
- Ensure managers are equipped to support their teams effectively and address retention concerns proactively.

2. Develop Succession Plans (Months 13-15)

- Identify critical roles and high-potential employees, and establish succession plans to ensure continuity.
- Provide cross-training and mentorship to build leadership capacity within the department.

Phase 6: Monitoring, Evaluation, and Continuous Improvement (Months 15-18)

1. Evaluate Results and Adjust Strategies (Months 15-16)

- Review retention metrics, employee satisfaction scores, and turnover data to measure the impact of implemented initiatives.
- Conduct follow-up surveys and feedback sessions to gauge employee perceptions of the changes.

2. Implement Continuous Improvement Practices (Months 16-18)

- Refine retention strategies based on evaluation results, remaining responsive to emerging workforce needs.
- Set up a feedback loop with regular check-ins to ensure retention efforts are sustained and evolve over time.

Ongoing Efforts

- **Monthly/Quarterly:** Monitor turnover data and employee feedback to stay informed about trends and continue to make necessary adjustments.
- **Annually:** Conduct a comprehensive review of retention efforts, update strategies based on new findings, and set revised goals for the following year.

This timeline allows the NDE to address urgent turnover issues quickly while building a sustainable, long-term approach to employee retention. By pacing these initiatives over 18 months, the department can effectively balance immediate needs with longer-term cultural and structural changes.

FISCAL IMPACT

This recommendation can be implemented with existing resources particularly if the proposed HR Liaison is hired.

As the foregoing analyses demonstrates, NDE faces monumental challenges that are root causes of the Department's inability to maximize its efficiency and effectiveness:

- Lack of adequate staff;
- Non-competitive salaries; and
- High staff turnover.

These challenges also cause NDE to rely heavily on contractors to fill the work gaps. The reorganization recommendations that follow must be considered in light of these challenges. Until these challenges are addressed, improvements as a result of reorganization will not be as robust as desired.

REORGANIZATION OF NDE

FINDING

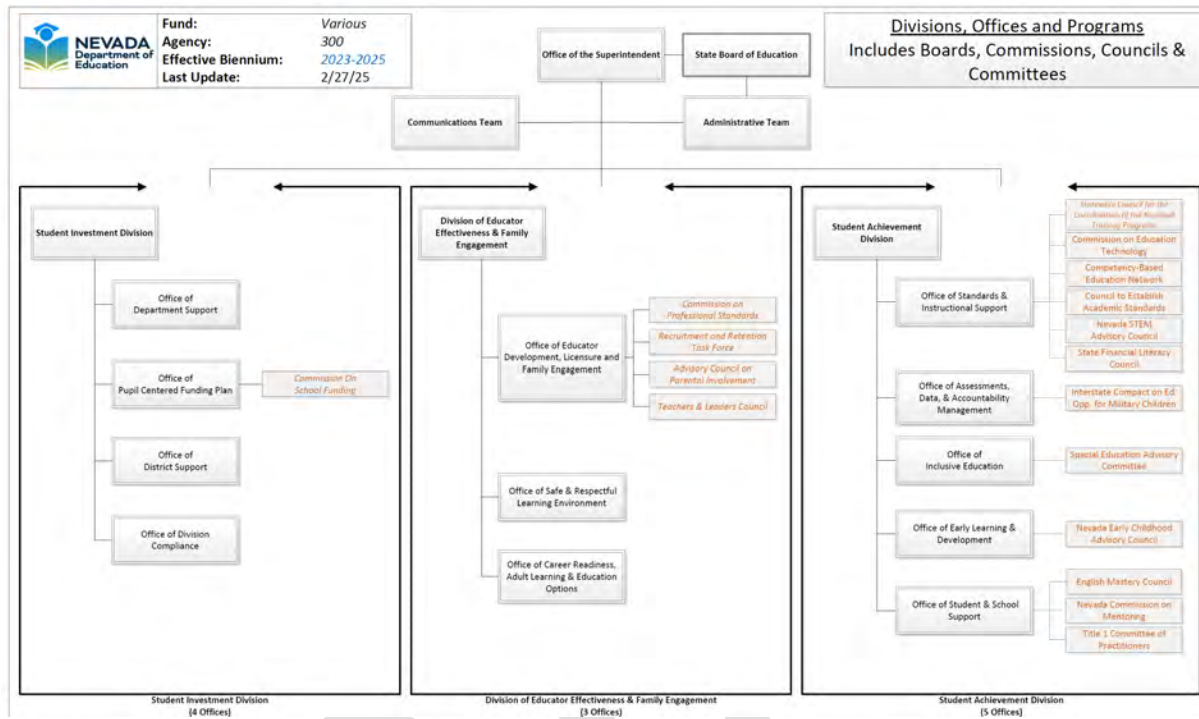
The current organization for NDE presents an opportunity for growth and improvement, particularly in enhancing coordination and collaboration across districts, schools, and staff. With a more integrated and cohesive structure, a reorganization of divisions should foster stronger communication and create a unified framework for delivering services to LEAs more effectively.

Peer Organization Charts

The first step in this process was to compare NDE's structure to the organizational designs of the five peer state departments of education: Arkansas, Kentucky, Oregon, Tennessee, and Utah.

NDE has three major divisions: Student Investment, Educator Effectiveness / Family Engagement, and Student Achievement. (A detailed description of all the peer states' organizational structures as well as potential strengths and weaknesses is included in **Appendix A**.) The NDE divisions and offices are shown outlined in **Exhibit 1-19**. As shown, there are three divisions with a total of 12 offices.

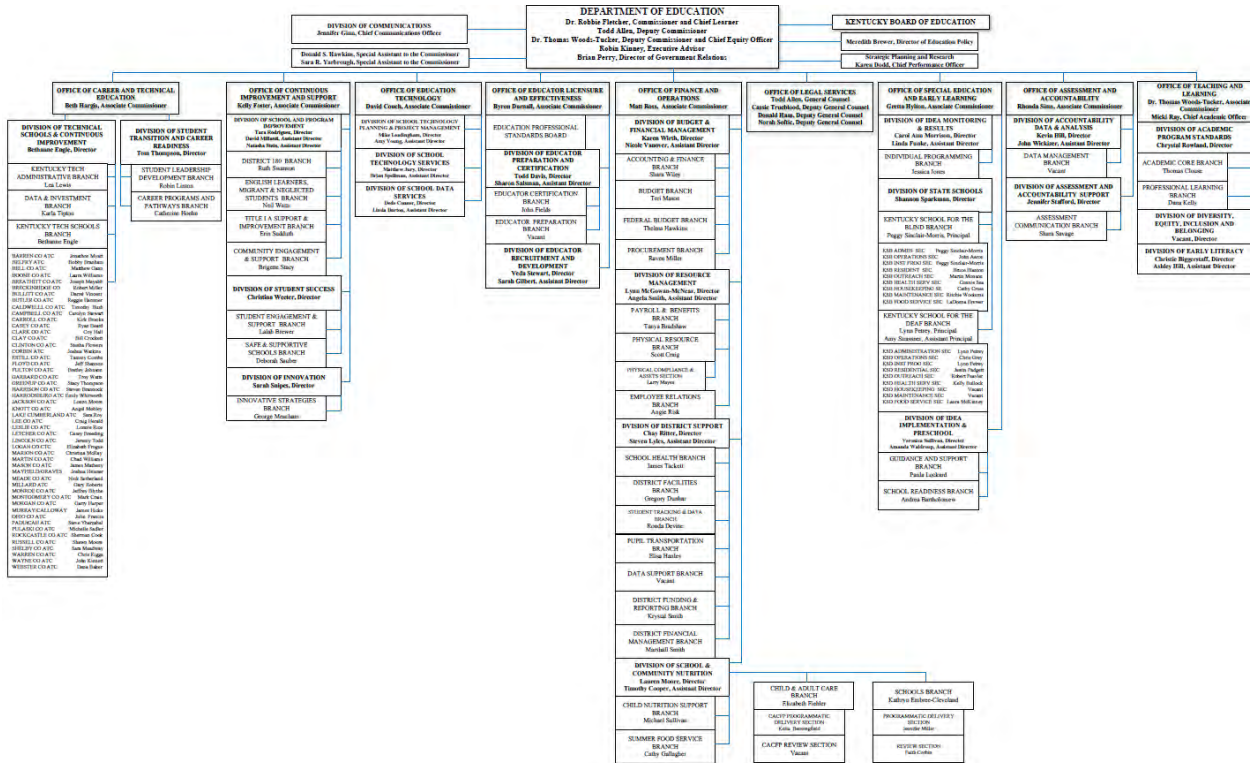
EXHIBIT 1-19
CURRENT NDE ORGANIZATIONAL STRUCTURE



Source: Nevada Department of Education, State Superintendent's Office, February 2025.

As shown in **Exhibit 1-20**, the Kentucky Department of Education has nine divisions including Career & Technical Education, Continuous Improvement & Support, Education Technology, Educator Licensure & Effectiveness, Finance & Operations, Legal Services, Special Education & Early Learning, Assessment & Accountability, and Teaching & Learning.

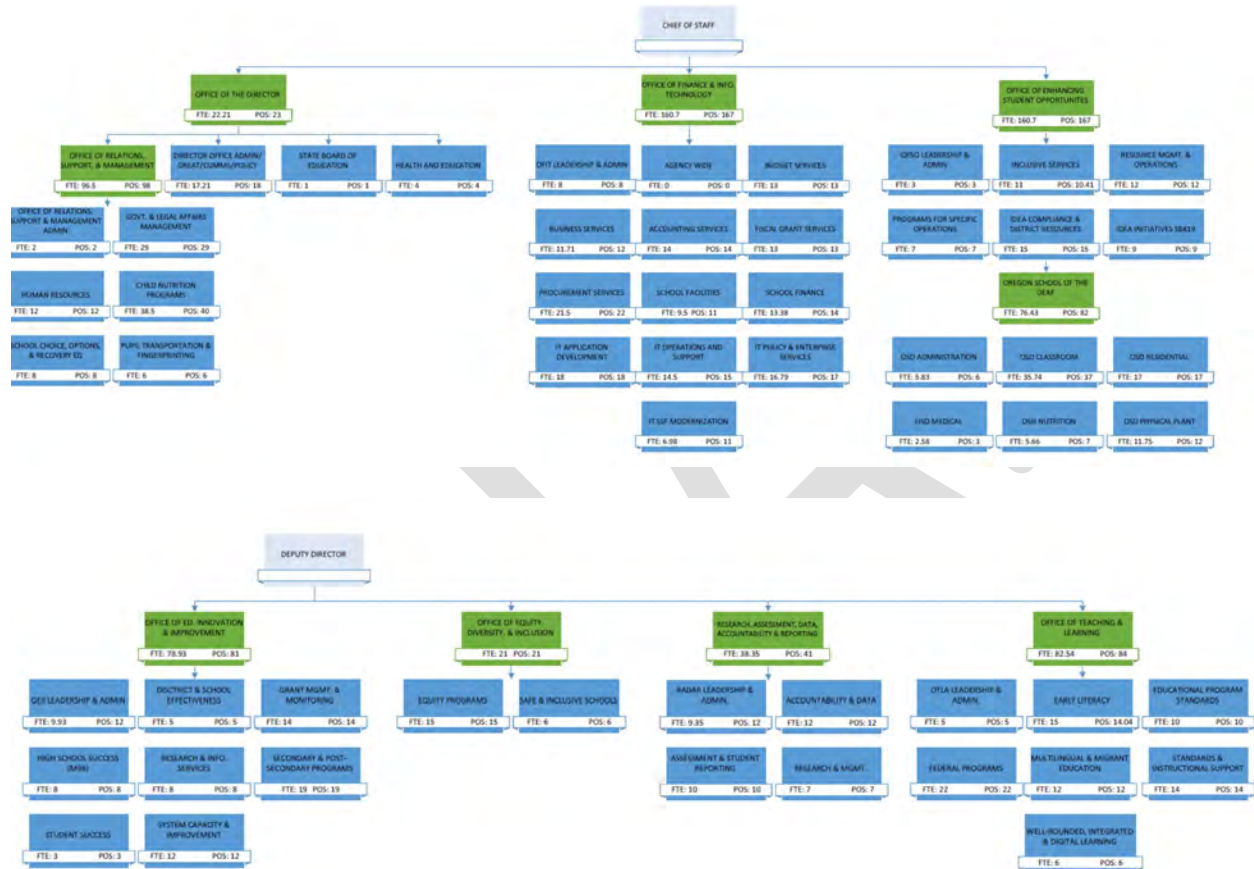
EXHIBIT 1-20 KENTUCKY DEPARTMENT OF EDUCATION ORGANIZATIONAL STRUCTURE



Source: [Kentucky Department of Education](#) organization chart, 2024.

As seen in **Exhibit 1-21**, the Oregon Department of Education has an Agency Director who has six direct reports including the Educator Advancement Council, Ready Schools / Safe Learners Team, Youth Development Division, the Office of Indian Education, as well as a Chief of Staff and a Deputy Director.

EXHIBIT 1-21
OREGON DEPARTMENT OF EDUCATION ORGANIZATIONAL STRUCTURE



Source: [Oregon Department of Education](#), 2024.

The Utah State Board of Education has four divisions including State Superintendent of Public Instruction, Audit Division, Deputy Superintendent of Operations and Parent Engagement. Due to its size, the organization chart for the Utah State Board of Education can be best viewed via the link on the [State Board of Education](#) website.

The Arkansas Department of Education does not have a traditional organization chart but does provide a list of staff by division and department. The divisions of the Arkansas Department of Education include Public School Program, Career & Technical Education, a Chief of Staff, Special Programs, Facilities & Transportation, Human Resources, Deputy Commissioner, Educator Effectiveness and Licensure, Learning Services, Federal Programs, District Operations, and Early Childhood.

The Tennessee Department of Education organization chart was not available. However, a list of employees organized by division and departments is available at this link: [Tennessee Department of Education](#). The major divisions of that department include Operations, Policy & Legislative Affairs,

Communications & Engagement, General Counsel, Human Resources, Internal Audit, Academics, and Programs.

The Public Works LLC team also reviewed the organizational structures from several high performing states based on national studies including New Jersey, Massachusetts, Delaware, Vermont, Maryland, Minnesota, and Wisconsin. While the organizational structures for those state departments varied greatly, they commonly included:

- **Policy Development and Oversight**
 - Establishing educational standards and frameworks (e.g., curriculum standards, graduation requirements).
 - Monitoring compliance with federal and state education laws.
 - Supporting legislative and regulatory processes.
- **Accountability and Data Analysis**
 - Collecting, analyzing, and reporting student performance and other education-related data.
 - Managing accountability systems to track school and district performance.
 - Using data to inform policies and interventions.
- **Professional Development and Educator Support**
 - Offering ongoing professional learning opportunities for teachers, administrators, and staff.
 - Establishing certification and licensure standards.
 - Supporting teacher recruitment, retention, and development programs.
- **Funding and Resource Allocation**
 - Administering state and federal education funds equitably.
 - Overseeing grant programs and other funding initiatives.
 - Providing technical assistance for budgeting and financial management in schools and districts.
- **Student Support Services**
 - Ensuring equitable access to education for underserved populations (e.g., special education, English learners).
 - Promoting mental health and well-being through school programs.
 - Addressing issues like chronic absenteeism and school discipline.
- **Innovation and School Improvement**
 - Supporting innovation in teaching and learning through pilot programs and research-based initiatives.
 - Managing programs for struggling schools and districts, such as turnaround and transformation efforts.
 - Promoting the integration of technology and digital learning.
- **Community and Stakeholder Engagement**
 - Building partnerships with families, communities, businesses, and higher education institutions.

- Conducting public engagement to understand and address stakeholder concerns.
- Providing clear and transparent communication about policies and initiatives.

Staffing Comparison by Division

A staffing comparison for four of the peer states and Nevada are extensively presented in **Appendix A**. NDE operates with a workforce of approximately 200 full-time equivalent positions, a leaner structure compared to several other states. Its staffing is distributed across critical areas, including educator licensure, student support, fiscal operations, and data management. Notably, the Educator Licensure division, with 20 staff members, underscores the importance Nevada places on ensuring a qualified teaching workforce. Significant resources are also allocated to district-level initiatives, such as District Support Services and Student School Support, reflecting a strong emphasis on direct impact at the school and district levels. Other divisions, like Career Readiness and Adult Learning, maintain smaller staff sizes, indicating narrower scopes or efficiency-driven operations.

In comparison, Arkansas, with over 500 FTEs, dedicates far more resources to areas like special education and early childhood programs. Initiatives such as First Connections and Early Childhood Licensing employ robust teams of 31 and 53 staff members, respectively, while Arkansas's state literacy program employs 51 literacy coaches, a focus notably absent in Nevada.

Oregon's Department of Education operates with an even larger workforce of over 800 FTEs, prioritizing equity, diversity, and technology. The state's Office of Equity, Diversity, and Inclusion and the Office of Indian Education collectively demonstrate a strong commitment to underserved populations. Oregon also invests significantly in its IT infrastructure, with multiple divisions supporting data systems and technology integration.

Tennessee, with approximately 900 FTEs, emphasizes regionalized support and early learning. The Centers for Regional Excellence employ 58 staff members to deliver localized professional development and school support, a decentralized model not seen in Nevada. Additionally, Tennessee allocates considerable resources to early childhood education and special education, with divisions employing 33 and 16 staff members, respectively.

Utah, operating with around 500 FTEs, showcases a strong focus on teaching and learning, evidenced by its Director of Teaching & Learning Strategic Initiatives, which employs 79 staff members. Utah also prioritizes special education, with 41 staff dedicated to this area.

In summary, Nevada's Department of Education operates with significantly fewer resources than Arkansas, Oregon, Tennessee, and Utah. While its streamlined structure allows for targeted initiatives, such as educator licensure and district support, it lacks the robust capacity seen in other states for areas like early childhood education, literacy programs, and IT infrastructure. These gaps highlight the challenges Nevada faces in achieving the breadth of specialized initiatives and support systems that are hallmarks of larger state education departments.

Overview of Survey Results

A third source of supportive information comes from two surveys conducted by Public Works LLC, a survey of key staff in each of the school districts and a survey of employees of the Nevada Department of Education. The Nevada Association of State Superintendents on behalf of Public Works LLC sent 168 email invitations to take the survey. It went to all 17 Superintendents and their executive staff who

interact with NDE. The overall response rate was 79 percent. The NDE staff survey had a 54 percent response rate of the 202 full and part-time employees invited to participate.

Several exhibits below show the responses from LEA and NDE staff regarding the overall effectiveness of the NDE organization. The responses from NDE and LEA staff regarding the effectiveness of NDE highlight significant differences in perception across key areas. Below is an analysis and comparison of their feedback. The percentages presented below for categories “Agree,” “Disagree,” and “No Opinion” do not add up to 100 percent because the “Agree” and “Disagree” percentages reflect only those respondents who had an opinion and have been rounded to the nearest whole percentage. Responses of “No Opinion” are presented as part of the total number of surveys responded to.

Providing Resources

- NDE Staff: 43% agreed that NDE is effective in providing resources, while 57% disagreed. Additionally, 23% expressed no opinion.
- LEA Staff: Only 38% agreed, with a higher percentage (63%) disagreeing. The "no opinion" rate was lower at 15%.
- Analysis: Both groups show a negative perception regarding resource provision, but LEA staff hold a slightly more critical view compared to NDE staff.

Communication

- NDE Staff: 58% agreed that NDE communicates effectively, whereas 42% disagreed, and 18% had no opinion.
- LEA Staff: Only 41% agreed with NDE's communication effectiveness, while a notable 59% disagreed, with 11% expressing no opinion.
- Analysis: While NDE staff rated communication more favorably, LEA staff exhibited a majority negative perception, suggesting a gap in effective messaging and interactions between NDE and LEAs.

Collaboration / Coordination

- NDE Staff: 49% agreed that collaboration and coordination are effective, just slightly below the 51% who disagreed. Meanwhile, 22% had no opinion.
- LEA Staff: Only 24% agreed, while a striking 76% disagreed, with 15% having no opinion.
- Analysis: Collaboration is perceived far more negatively by LEA staff than NDE staff, pointing to a substantial disconnect in coordinated efforts between the two groups.

Timely Regulations

- NDE Staff: 61% of NDE staff agreed that regulations are delivered timely, while 39% disagreed. A significant 40% expressed no opinion.
- LEA Staff: Only 36% of LEA staff agreed, with 64% disagreeing and 22% expressing no opinion.
- Analysis: While NDE staff view regulation timeliness more positively, LEA staff hold a much more critical stance, indicating delays or unclear communication about regulations may be an issue for LEAs.

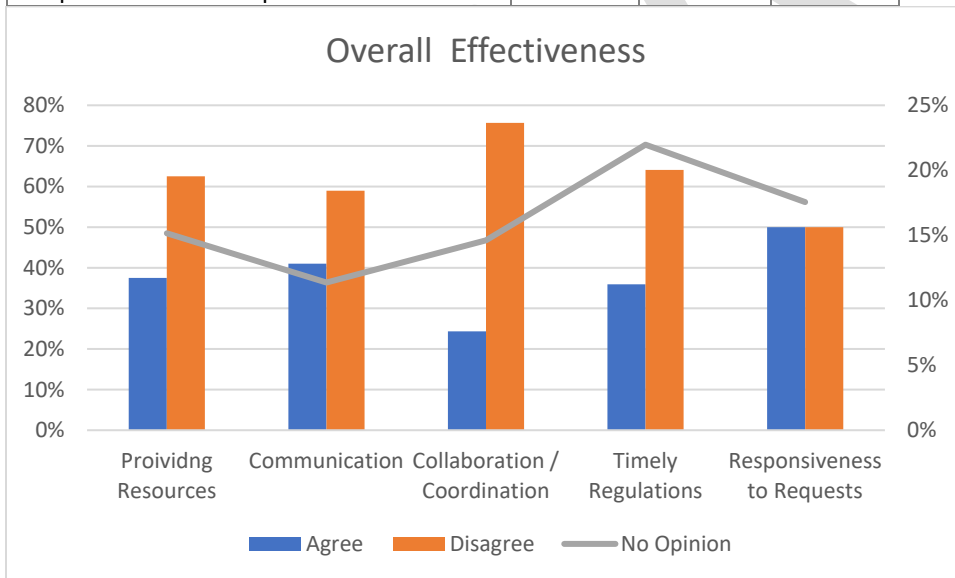
Responsiveness to Requests

- NDE Staff: 84% agreed that NDE is responsive to requests, with only 16% disagreeing. However, 25% expressed no opinion.

- LEA Staff: Agreement was considerably lower at 50%, with an equal 50% disagreement rate and 18% expressing no opinion.
- Analysis: This is the most positively rated aspect by NDE staff, yet LEA staff's agreement rate is significantly lower, showing a disparity in how responsiveness is perceived by the two groups.

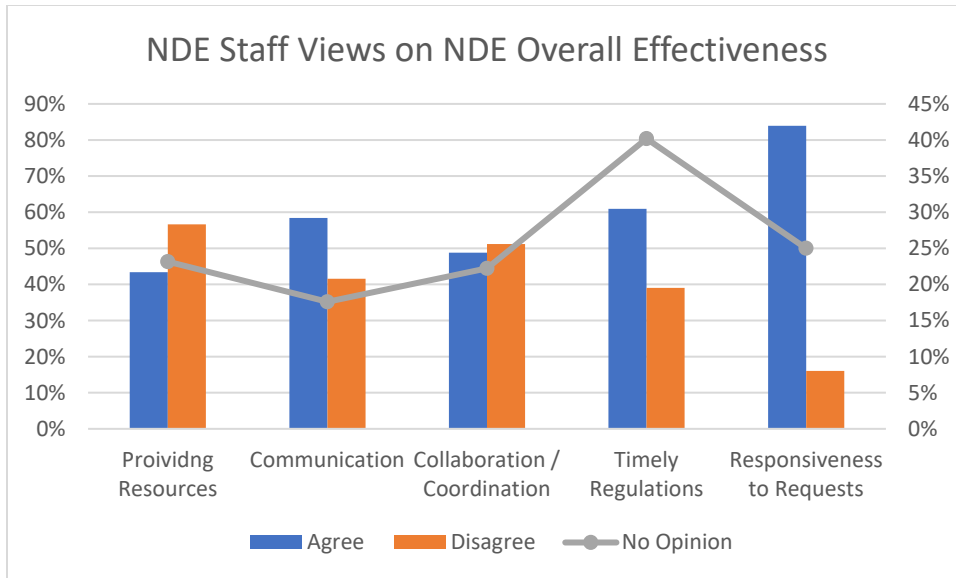
The results reveal a consistent gap between how NDE and LEA staff perceive NDE's overall effectiveness. While NDE staff generally rate their performance more favorably, LEA staff are more critical, particularly in areas of collaboration, communication, and timely regulations. This discrepancy suggests potential issues in alignment and mutual understanding between NDE and LEAs. Addressing these differences through improved collaboration, clearer communication, and better resource delivery could help bridge the divide and improve perceptions across both groups.

LEA Views on NDE Overall Effectiveness	Agree	Disagree	No Opinion
Providing Resources	38%	63%	15%
Communication	41%	59%	11%
Collaboration / Coordination	24%	76%	15%
Timely Regulations	36%	64%	22%
Responsiveness to Requests	50%	50%	18%



Source: Public Works LLC 2025. The percentages for categories "Agree," "Disagree," and "No Opinion" do not add up to 100 percent because the "Agree" and "Disagree" percentages reflect only those respondents who had an opinion and have been rounded to the nearest whole percentage. Responses of "No Opinion" are presented as part of the total number of surveys responded to.

NDE Staff Views on NDE Overall Effectiveness	Agree	Disagree	No Opinion
Providing Resources	43%	57%	23%
Communication	58%	42%	18%
Collaboration / Coordination	49%	51%	22%
Timely Regulations	61%	39%	40%
Responsiveness to Requests	84%	16%	25%



Source: Public Works LLC 2025. The percentages for categories "Agree," "Disagree," and "No Opinion" do not add up to 100 percent because the "Agree" and "Disagree" percentages reflect only those respondents who had an opinion and have been rounded to the nearest whole percentage. Responses of "No Opinion" are presented as part of the total number of surveys responded to.

A second item that was on both the LEA and NDE staff surveys asked respondents to comment on six key roles that the department plays in serving the school districts. The charts below illustrate both the responses from the school districts as well as NDE staff.

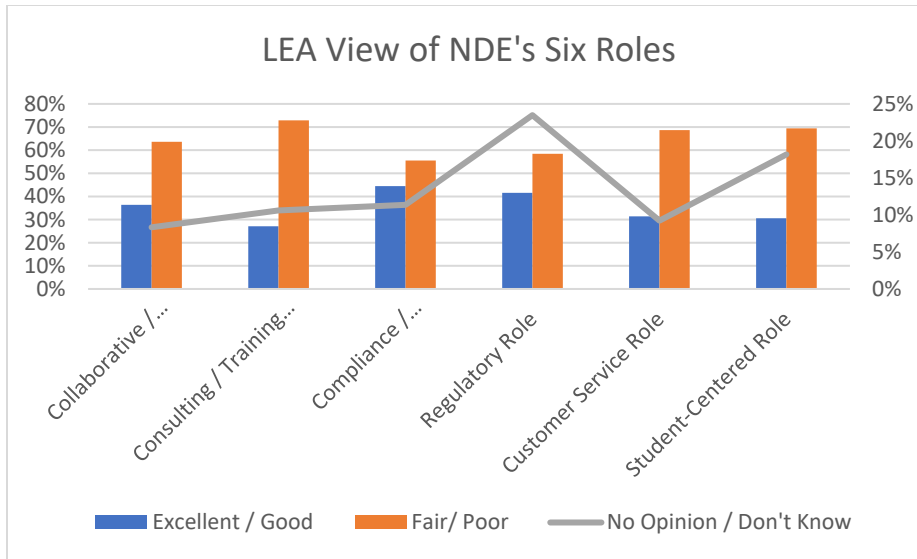
The survey results reveal a notable disparity between the perceptions of LEA and NDE staff regarding the effectiveness of NDE's six key roles.

- **Collaborative/Partner Role:**
 - LEA Staff: Only 36% rated this role as "Excellent/Good," while 64% rated it "Fair/Poor."
 - NDE Staff: A significantly higher 72% of NDE staff rated this role as "Excellent/Good," with only 28% rating it "Fair/Poor."
 - This indicates a significant gap in how this role is perceived, with NDE staff rating themselves much higher than LEA staff do.
- **Consulting/Training Role:**
 - LEA Staff: Just 27% rated this role as "Excellent/Good," with 73% indicating "Fair/Poor."
 - NDE Staff: 59% rated it as "Excellent/Good," with 41% rating it "Fair/Poor."
 - While NDE staff view their performance in this role more favorably, both groups agree that there is room for improvement.
- **Compliance/Enforcement Role:**
 - LEA Staff: 44% provided an "Excellent/Good" rating, while 56% chose "Fair/Poor."
 - NDE Staff: 59% rated this role as "Excellent/Good," with 41% indicating "Fair/Poor."
 - While the NDE staff perceive their performance more positively, the gap here is smaller than in other roles.

- **Regulatory Role:**
 - LEA Staff: 42% rated this role as "Excellent/Good," and 58% rated it "Fair/Poor."
 - NDE Staff: 65% provided an "Excellent/Good" rating, while 35% selected "Fair/Poor."
 - This role also sees a significant gap in perception, with LEA staff being less satisfied with NDE's regulatory performance.
- **Customer Service Role:**
 - LEA Staff: Only 31% rated this role as "Excellent/Good," while 69% rated it "Fair/Poor."
 - NDE Staff: A much higher 74% rated this role as "Excellent/Good," and just 26% rated it "Fair/Poor."
 - This role demonstrates one of the most substantial differences in perception, with NDE staff expressing a much more positive view of their customer service capabilities.
- **Student-Centered Role:**
 - LEA Staff: Only 31% rated this role as "Excellent/Good," and 69% rated it "Fair/Poor."
 - NDE Staff: 70% rated this role as "Excellent/Good," with 30% selecting "Fair/Poor."
 - Similar to the customer service role, there is a stark contrast in how this role is viewed, with LEA staff showing significant dissatisfaction compared to the more favorable self-assessment by NDE staff.

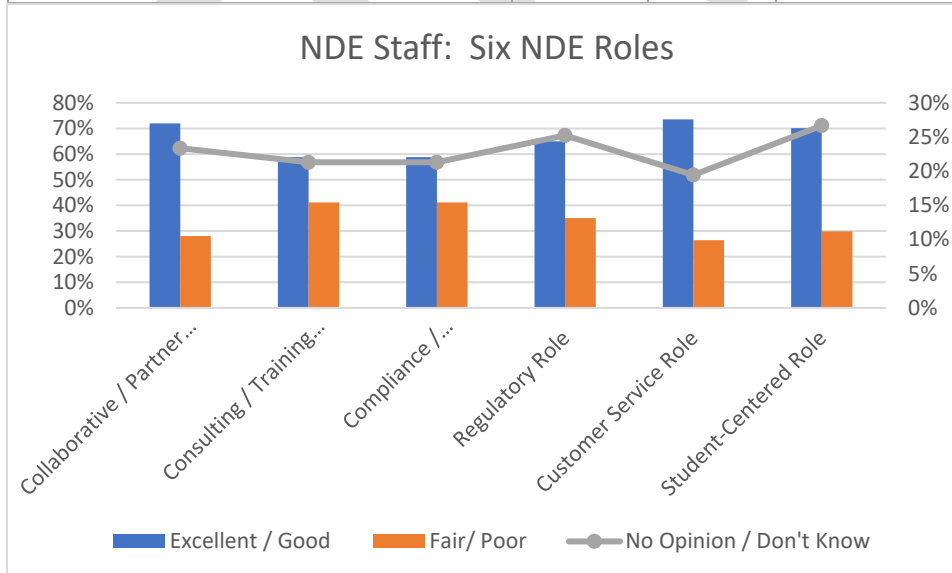
The data highlights a consistent pattern: NDE staff rate their performance across all six roles far more positively than LEA staff do. The largest gaps are observed in the Collaborative/Partner Role, Customer Service Role, and Student-Centered Role, where NDE staff express high confidence while LEA staff indicate significant dissatisfaction. These discrepancies suggest a need for greater alignment and communication between NDE and LEA staff to ensure mutual understanding and improved collaboration.

LEA Staff: Six NDE Roles	Excellent/ Good	Fair/ Poor	No Opinion/ Don't Know
Collaborative / Partner Role	36%	64%	8%
Consulting / Training Role	27%	73%	11%
Compliance / Enforcement Role	44%	56%	11%
Regulatory Role	42%	58%	23%
Customer Service Role	31%	69%	9%
Student-Centered Role	31%	69%	18%



Source: Public Works LLC 2025. The percentages for categories "Excellent/Good," "Fair/Poor," and "No Opinion" do not add up to 100% because the "Excellent/Good" and "Fair/Poor" percentages reflect only those respondents who had an opinion. Responses of "No Opinion" are presented as part of the total number of surveys responded to.

NDE Staff: Six NDE Roles	Excellent / Good	Fair / Poor	No Opinion / Don't Know
Collaborative / Partner Role	72%	28%	23%
Consulting / Training Role	59%	41%	21%
Compliance / Enforcement Role	59%	41%	21%
Regulatory Role	65%	35%	25%
Customer Service Role	74%	26%	19%
Student-Centered Role	70%	30%	27%



Source: Public Works LLC 2025. The percentages for categories "Excellent/Good," "Fair/Poor," and "No Opinion" do not add up to 100% because the "Excellent/Good" and "Fair/Poor" percentages reflect only those respondents who had an opinion. Responses of "No Opinion" are presented as part of the total number of surveys responded to.

An item that appeared in only the LEA survey asked respondents to provide feedback on statements about how the NDE balances its role in ensuring compliance and providing support to school districts, whether NDE staff had adequate experience at the school and district level to make informed decisions on policies that impact schools, the impact of turnover at NDE, and items on NDE's role in fostering collaboration between and among school districts and external partners. The chart below provides the data from the responses to these items.

The survey results highlight LEA leaders' concerns and perceptions about the NDE in key areas of support, compliance, experience, turnover rates, and collaboration. The data reveals notable challenges and areas requiring improvement:

Balancing Support and Compliance

- Only 34% of respondents agreed that the NDE effectively balances support and compliance responsibilities.
- A significant 66% disagreed, indicating dissatisfaction with how the department manages these priorities.
- 19% expressed no opinion.

These results suggest that the majority of LEA leaders perceive the NDE as overly focused on compliance, potentially at the expense of providing the necessary support to districts.

NDE Staff Experience

- Just 23% agreed that NDE staff possess adequate experience to fulfill their roles effectively.
- An overwhelming 77% disagreed, reflecting widespread dissatisfaction with staff expertise.
- 20% had no opinion on this matter.

This is a critical finding that points to a need for capacity building, professional development, or improved hiring practices within the NDE.

Impact of Turnover Rates on Districts

- 92% of respondents agreed that high turnover rates within the NDE significantly impact district operations.
- Only 8% disagreed.
- 13% expressed no opinion.

The near-unanimous agreement indicates that staff turnover is a major issue, disrupting continuity, communication, and support provided to districts.

Fostering Collaboration with Districts

- 38% of respondents believed that the NDE fosters effective collaboration with districts.
- A notable 62% disagreed, pointing to dissatisfaction with the department's collaborative efforts.
- 24% had no opinion, indicating some uncertainty or lack of visibility into NDE's efforts in this area.

These results suggest that NDE needs to improve its approach to building trust, communication, and collaborative partnerships with school districts.

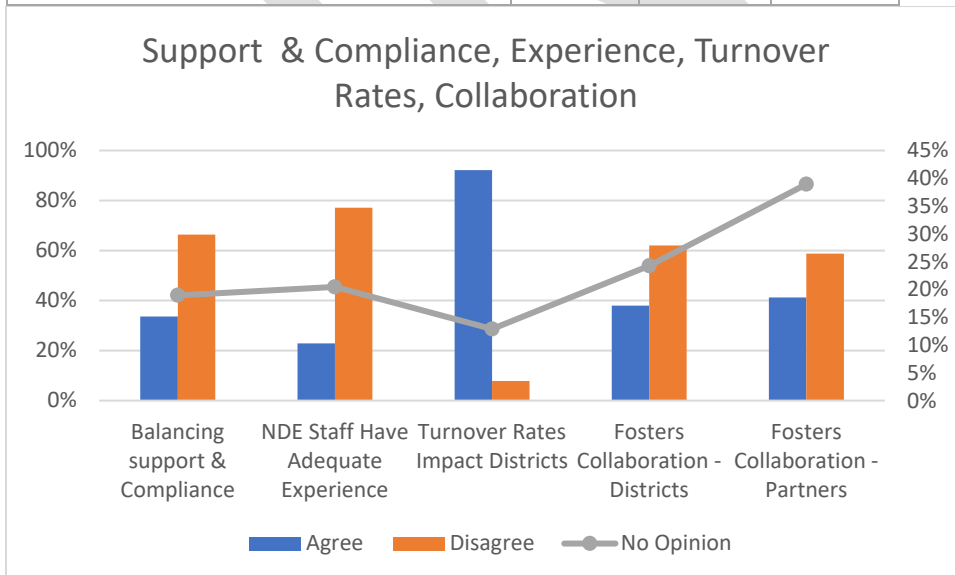
Fostering Collaboration with Partners

- 41% agreed that the NDE fosters collaboration with external partners.
- However, 59% disagreed.
- 39% expressed no opinion.

While slightly better than district collaboration, the results still highlight room for improvement in how the NDE works with external organizations and underscore several critical challenges:

- **Balancing Priorities:** The perception that compliance is prioritized over support indicates the need for a more balanced approach that meets compliance requirements while addressing the needs of districts.
- **Staff Expertise:** Widespread concerns about inadequate experience among NDE staff point to the need for targeted professional development and strategies to attract and retain qualified personnel.
- **Turnover Rates:** High turnover rates are seen as a significant barrier to effective support and collaboration, suggesting that addressing staff retention should be a priority.
- **Collaboration:** Both internal (with districts) and external (with partners) collaboration efforts require significant improvement to build stronger relationships and enhance outcomes.

Support & Compliance, Experience, Turnover Rates, Collaboration	Agree	Disagree	No Opinion
Balancing support & Compliance	34%	66%	19%
NDE Staff Have Adequate Experience	23%	77%	20%
Turnover Rates Impact Districts	92%	8%	13%
Fosters Collaboration - Districts	38%	62%	24%
Fosters Collaboration - Partners	41%	59%	39%



Source: Public Works LLC 2025. The percentages for categories “Agree,” “Disagree,” and “No Opinion” do not add up to 100% because the “Agree” and “Disagree” percentages reflect only those respondents who had an opinion. Responses of “No Opinion” are presented as part of the total number of surveys responded to.

The final item from the LEA survey that reflects directly on the overall organization of NDE was one in which respondents were asked “Do you receive duplicative or inconsistent directives from Offices/Divisions of the Nevada Department of Education?” The chart below shows the aggregated responses from the LEA staff who participated in the survey.

The finding that 81 percent of LEA respondents reported receiving duplicative or inconsistent directives from the NDE has significant implications for both local school districts and the NDE itself.

Implications for Local School Districts:

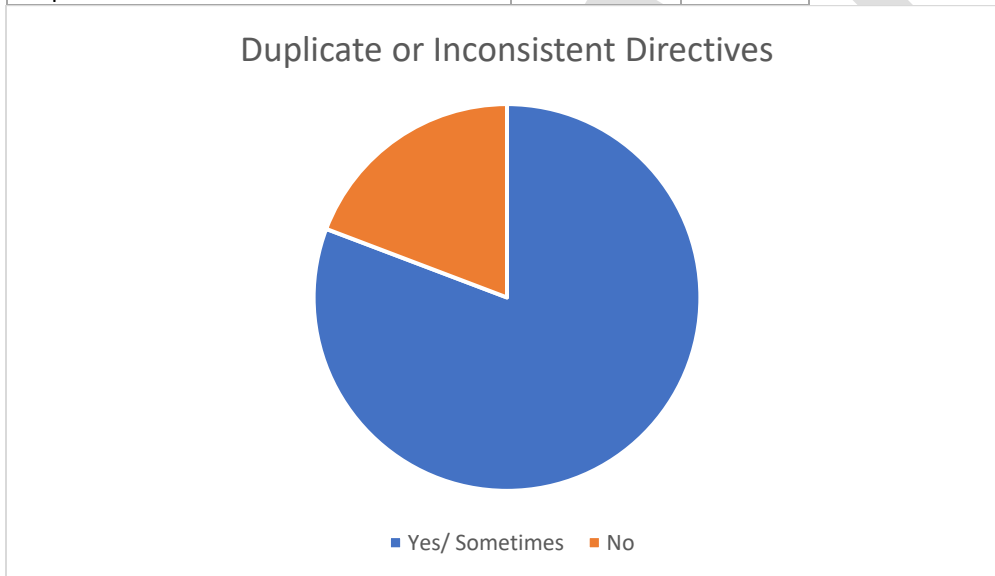
- **Confusion and Inefficiency:**
 - Inconsistent or duplicative directives create confusion among school district leaders, who are left uncertain about how to prioritize or implement policies.
 - This can lead to inefficiencies in operations as districts may need to spend additional time clarifying instructions, reconciling conflicting directives, or revising plans that were initially based on unclear guidance.
- **Loss of Trust:**
 - Repeated experiences of inconsistent communication can erode trust in the NDE’s ability to provide clear and reliable guidance.
 - LEA leaders may begin to perceive the NDE as disorganized or uncoordinated, which can harm collaborative efforts between the state department and local districts.
- **Disruption of Educational Goals:**
 - When districts are forced to navigate conflicting guidance, it diverts time and resources away from their primary focus—delivering quality education to students.
 - This can hinder the implementation of initiatives, policies, and programs aimed at improving student outcomes.
- **Frustration and Staff Morale:**
 - Repeated issues with unclear directives can lead to frustration among district leaders and staff, potentially lowering morale and diminishing their ability to effectively serve schools and students.

Implications for the Nevada Department of Education:

- **Credibility and Accountability:**
 - A high percentage of LEA respondents perceiving the NDE as a source of inconsistent directives undermines the department’s credibility.
 - This finding may prompt external stakeholders, including policymakers, to scrutinize the NDE’s processes and communication practices.
- **Operational Inefficiency:**
 - The issuance of inconsistent or duplicative directives likely reflects a lack of coordination and communication among NDE offices.
 - This inefficiency not only affects school districts but also suggests a need for internal process improvements within the department.

- **Missed Opportunities for Collaboration:**
 - Ineffective communication limits the potential for the NDE to foster strong partnerships with local school districts.
 - Collaboration requires clear, consistent guidance to build trust and align efforts toward shared goals.
- **Need for Process Improvement:**
 - The findings indicate a pressing need for the NDE to streamline its communication processes and improve interdepartmental coordination to ensure consistent and coherent messaging.
 - This may involve the implementation of centralized communication protocols or enhanced staff training to address gaps in clarity and consistency.

Does NDE Provide:	Yes/ Sometimes	No
Duplicate or Inconsistent Directives	81%	19%



Source: Public Works LLC 2025.

RECOMMENDATION 1-5:

Reorganize the Nevada Department of Education to improve efficiency and effectiveness, enhance collaboration and culture, and promote accountability and service, all on behalf of improving student learning.

RECOMMENDATION 1-6:

Once NDE has been reorganized and the Statewide Plan for the Improvement of Pupils (STIP) has been updated, NDE leadership need to ensure all activities, committees, and initiatives are laser-focused on the STIP and abandon all other activities or initiatives that do not support their strategic plan, mission, and legislative mandates.

Exhibit 1-22 below is the proposed organization chart for the Nevada Department of Education developed by Public Works LLC in collaboration with NDE staff.

Attributes of the Proposed Structure

New Positions

- The proposed organization structure reduces the number of direct reports to the Superintendent of Public Instruction from nine to six allowing for improved focus and efficiency, enhanced quality of supervision, reduced managerial overload, streamlined communication, increase strategic capacity, and alignment with best practices.
- Creating the position of Deputy Administrator who reports to the State Superintendent will enhance strategic coordination across departments, improve operational efficiency, provide policy and project oversight, enhance stakeholder engagement and representation, improve crisis management, facilitate decision-making, and create leadership support and succession.
- Adding a Human Resources (HR) Liaison to a state department of education, even when HR services are already provided by the state department of human resources (DHR), can offer several strategic and practical benefits including improved communication and coordination; tailored support for education-specific needs especially in onboarding teachers; faster issue resolution, policy compliance, employee advocacy, and support; strategic workforce planning, enhanced efficiency and service delivery, as well as data and reporting support.
- Adding a Policy Administrator to a state department of education that struggles with developing timely policies and procedures can address key organizational challenges and enhance the department's effectiveness.
- Creating a Chief Information Systems Officer (CISO) position in a state department of education, reporting directly to the State Superintendent, provides strategic, operational, and technological advantages critical to modernizing and streamlining education systems through strategic leadership in technology, enhanced data-driven decision-making, oversight of IT infrastructure and security, integration and interoperability, support for digital transformation, fairness in technology access, cost efficiency and resource optimization, support for data privacy and compliance, disaster recovery and business continuity, alignment with today's educational trends, clear accountability for IT and data strategy, and leadership in cross-agency collaboration. By placing the CISO as a direct report to the State Superintendent, the department ensures technology's role is not siloed but integrated into top-level decision-making, maximizing its impact on education outcomes and operational efficiency. This arrangement underscores the importance of IT as a strategic enabler of the department's mission.

Realignment of NDE Divisions and Offices

- Moving Family Engagement from under Educator Development and Licensure to Safe & Respectful Learning Environments reflects a holistic focus on student well-being, an emphasis on fairness and inclusion, and better alignment with federal policies.
- The rationale for moving the IT Manager and Data Systems and Technology Operations from under Student Achievement to the Office of the Chief Information Systems Officer (CISO) in a state department of education reflects an effort to improve alignment, efficiency, and strategic focus in managing technology and data.

- Having Assessment & Accountability have a dual reporting relationship to both the Chief Information Systems Officer and Teaching & Learning reflects the need to integrate technical capabilities with educational priorities.
- Placing a Read by Grade 3 program under Early Childhood and Development rather than Teaching & Learning in a state department of education underscores the importance of addressing literacy development as part of a child's foundational early learning journey.
- Placing the Department of Inclusive Education under School, Educator, and Learning Supports rather than Student Achievement in a state department of education underscores the idea that inclusion is fundamentally about creating the necessary supports, environments, and systems to enable all students to access learning.
- Placing the Office of Career Readiness, Adult Learning, and Education Options under Student Achievement rather than Educator Effectiveness and Licensure in a state department of education reflects a strategic emphasis on aligning these programs with student outcomes and lifelong learning pathways.

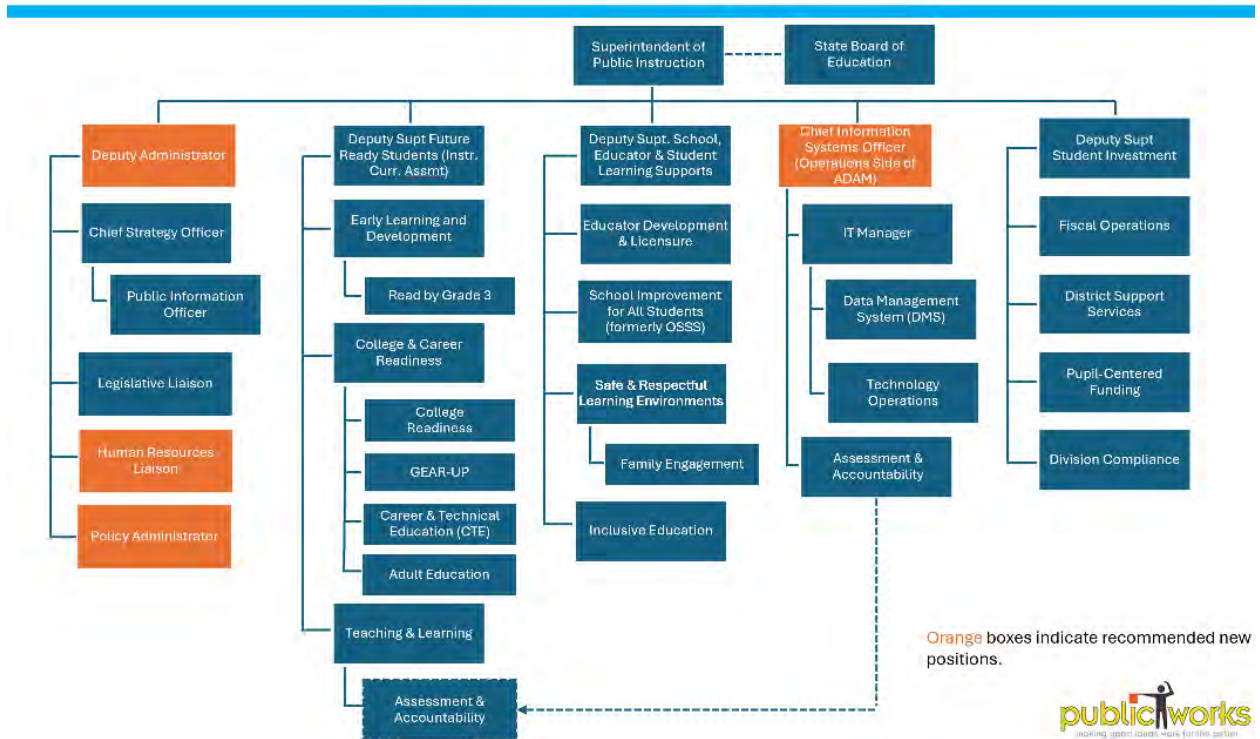
Retitled Divisions / Departments

- Retitling the Division of Student Achievement as Future Ready Students in a state department of education reflects a strategic shift in focus, branding, and priorities. The new title emphasizes preparing students for the demands of the future, encompassing academic success, career readiness, and life skills.
- Retitling the Office of Student and School Support as the Office for School Improvement for All Students reflects a shift in focus, scope, and priorities to emphasize inclusivity, fairness, and a unified approach to improving education for every student and school.
- Retitling the division from Educator Effectiveness and Family Engagement to School, Educator, & Student Learning Supports reflects a strategic effort to better encapsulate the broader mission and scope of the division, given its expanded responsibilities.

A detailed rationale for the changes follows the presentation of the proposed NDE organization chart.

EXHIBIT 1-22
PROPOSED REORGANIZATION OF NDE

Proposed NDE Organizational Chart



Source: Created by the Public Works LLC Team, 2025.

DETAILED RATIONALE FOR ORGANIZATION CHANGES

Reducing the State Superintendent's Number of Direct Reports

Reducing the number of direct reports from nine to six can be highly beneficial the Nevada Superintendent of Education for several reasons:

Improved Focus and Efficiency

- **Easier Decision-Making:** Managing fewer direct reports allows the superintendent to focus more deeply on key strategic areas rather than being overwhelmed by a large number of diverse issues.
- **Prioritization:** With fewer direct reports, the superintendent can allocate time and attention to higher-priority tasks and pressing matters.

Enhanced Quality of Supervision

- **Deeper Engagement:** Managing six direct reports enables more meaningful interactions and in-depth discussions about performance, goals, and challenges.
- **Effective Support:** Directors/Supervisors can provide better guidance and mentorship to a smaller group, leading to improved outcomes.

Reduced Managerial Overload

- **Avoiding Bottlenecks:** A large number of direct reports increases the risk of delays in decision-making, as the superintendent may struggle to address every issue in a timely manner.
- **Preventing Burnout:** Reducing the number of direct reports minimizes the stress and cognitive load of managing too many individuals.

Streamlined Communication

- **Better Information Flow:** A smaller team can improve the clarity and consistency of communication, reducing the risk of misaligned goals or conflicting directives.
- **Coordinated Efforts:** Fewer direct reports facilitate more cohesive collaboration among senior staff members.

Delegation and Empowerment

- **Middle Management Strength:** By consolidating reporting lines, responsibilities can be delegated more effectively to mid-level managers, empowering them to lead their teams independently.
- **Specialized Oversight:** Each direct report can oversee a more focused area, reducing duplication and increasing expertise in key domains.

Increased Strategic Capacity

- **Focus on Big Picture:** With fewer direct reports, the superintendent has more time to address long-term strategic priorities rather than being bogged down by daily operational details.
- **Proactive Leadership:** This frees up bandwidth for innovation, stakeholder engagement, and addressing systemic issues.

Alignment with Best Practices

- Research on span of control suggests that managing 5-7 direct reports is an optimal range for senior executives. This structure balances effective oversight with operational efficiency, as indicated by organizational studies from sources like Harvard Business Review and McKinsey & Company.

Rationale for Deputy Administrator

The State Superintendent of Education operates at the helm of a complex organization responsible for education policy, funding, compliance, and stakeholder engagement. The following reasons justify why such a leader requires a Deputy Administrator reporting to them:

Strategic Coordination Across Departments

- The state department of education oversees multiple functions, including curriculum standards, teacher certification, federal compliance, and financial oversight. A Deputy Administrator ensures that these diverse functions are aligned with the superintendent's vision and strategic goals.
- They act as a central hub for coordinating efforts across departments, avoiding silos and ensuring unified action.

Operational Efficiency

- The State Superintendent often manages both high-level policy matters and operational challenges. Delegating day-to-day management to a Deputy Administrator allows the State Superintendent to focus on strategic priorities while ensuring smooth departmental operations.
- This includes managing meetings, ensuring timely communication, and supervising staff workflows.

Policy and Project Oversight

- State education departments are responsible for implementing federal and state education policies, managing grant programs, and launching statewide initiatives. A Deputy Administrator can oversee these projects, track progress, and address bottlenecks, keeping the CSSO informed without being mired in details.

Stakeholder Engagement and Representation

- The State Superintendent engages with diverse stakeholders, including governors, legislators, school districts, and the public. A Deputy Administrator can represent the CSSO in meetings, prepare briefing materials, and serve as a liaison to ensure stakeholders' needs are met and concerns are addressed.

Facilitating Decision-Making

- The State Superintendent makes decisions that impact millions of students, educators, and families. A Deputy Administrator can analyze data, gather input, and present well-rounded recommendations, enabling informed and timely decision-making.

Leadership Support and Succession

- The Deputy Administrator often acts as an extension of the State Superintendent's leadership, helping to implement their vision across the organization. They also serve as a point of continuity, maintaining stability during leadership transitions or periods of absence.

Rationale for Human Resources (HR) Liaison

Having a dedicated staff member act as a liaison in human resources between NDE and the broader state HR function is critical for several reasons:

Ensure Alignment with State Policies and Regulations

- Compliance: State HR departments often operate under complex, standardized policies and procedures that the NDE must adhere to. A liaison ensures that the NDE's specific needs are met while staying compliant with state regulations.
- Interpretation and communication: The liaison can translate state-level policies into actionable steps tailored to the NDE's unique context, reducing misunderstandings and errors.

Advocate for NDE-Specific Needs

- Understanding NDE's mission: The liaison serves as the advocate for the NDE's specific human resource requirements, such as recruiting and retaining education professionals, which may differ from other state agencies.
- Custom solutions: They help craft solutions or negotiate accommodations that address NDE-specific challenges, such as teacher shortages or specialized certifications, within the framework of state HR rules.

Streamline Communication

- Centralized contact point: The liaison acts as a single point of contact, reducing delays and confusion caused by multiple NDE staff members interacting with the state HR department.
- Timely updates: They ensure that the NDE is promptly informed of changes in state policies, deadlines, and new initiatives affecting personnel services.

Address NDE's Staffing Challenges

- Support for hiring and retention: In a department with high turnover and low salaries, the liaison can work closely with state HR to expedite hiring processes, explore creative retention strategies, and manage vacancies more effectively.
- Workforce planning: The liaison can advocate for resources or exemptions to help the NDE address chronic understaffing, ensuring the workforce aligns with educational goals.

Facilitate Problem-Solving

- Conflict resolution: The liaison can mediate issues between NDE employees and the state HR function, such as disputes over benefits, classifications, or payroll.
- Quick escalation: They can identify and escalate unresolved or systemic issues to the appropriate level within state HR to ensure prompt resolution.

Provide Specialized Expertise

- Understanding education-specific roles: Many roles in the NDE (e.g., curriculum specialists, education policy advisors) are unique and require specialized HR knowledge. The liaison bridges the gap between general HR processes and the unique demands of these positions.
- Professional development coordination: They can ensure that NDE staff members have access to relevant training and career development opportunities offered by the state HR function.

Enhance Efficiency

- Prevent delays: By understanding both NDE's internal processes and state HR's systems, the liaison can preempt bottlenecks, reducing delays in hiring, onboarding, and addressing HR-related concerns.
- Customized support: They can help tailor state-level tools, such as performance evaluation systems or recruitment platforms, to better suit the NDE's operations.

Build Relationships and Trust

- Inter-agency collaboration: The liaison fosters stronger relationships between the NDE and state HR, promoting mutual understanding and collaboration.
- Consistency: Having a reliable point of contact builds trust and ensures that issues are addressed consistently and proactively.

A dedicated HR liaison is essential for ensuring that the NDE's unique personnel needs are met while maintaining compliance with state policies. This role improves communication, advocates for education-specific concerns, resolves issues efficiently, and helps align HR services with the NDE's mission to support schools and students.

Rationale for Policy Administrator

Having a policy administrator who leads the development of policies and procedures for a state department of education (i.e., NDE) is critical for several reasons. This role ensures coherence, accountability, and alignment across the NDE, enabling it to fulfill its mission effectively and efficiently.

Ensure Consistency Across Offices

- Unified direction: With multiple offices, each focused on specialized functions (e.g., curriculum, special education, assessment), inconsistencies can arise. A policy administrator ensures all policies and procedures align with the NDE's overarching goals and state mandates.
- Standardized processes: Uniform procedures minimize misunderstandings and reduce variability in how departments operate, creating a more predictable and reliable organizational environment.

Improve Compliance and Risk Management

- Legal and regulatory adherence: The policy administrator ensures that NDE policies comply with federal and state laws, as well as regulations governing education. This reduces the risk of non-compliance penalties or legal challenges.
- Accountability: Clear policies and procedures establish accountability frameworks, ensuring that all employees understand their roles and responsibilities.

Facilitate Coordination and Collaboration

- Break down silos: By developing procedures that promote cross-departmental collaboration, the policy administrator addresses the common issue of silos, enabling more effective teamwork and shared decision-making.
- Aligned priorities: Policies and procedures developed under a central leader ensure that each department's goals are aligned with the NDE's overall mission and strategic plan.

Enhance Efficiency and Productivity

- Streamlined processes: A policy administrator identifies redundant or conflicting processes and works to standardize them, improving efficiency and reducing wasted resources.
- Clear guidance: With well-developed policies, staff members have clear guidance on how to perform their duties, leading to fewer errors and less confusion.

Adaptability to Change

- Policy revision and updates: Education policies and practices often change due to legislative mandates, new standards, or evolving educational needs. A policy administrator ensures timely updates to policies and procedures, keeping the NDE responsive and relevant.
- Crisis management: During unexpected events (e.g., public health emergencies, budget cuts), the policy administrator can quickly develop or revise procedures to guide the NDE's response.

Support for Decision-Making

- Data-informed policy development: A policy administrator can incorporate data and feedback into policy creation, ensuring decisions are based on evidence and best practices.
- Centralized leadership: This role serves as a hub for policy-related decisions, reducing delays and confusion in the decision-making process.

Improve Communication and Transparency

- Clear documentation: Centralized policies and procedures provide all staff with access to consistent and transparent information about NDE operations and expectations.
- Stakeholder engagement: The policy administrator ensures that policies and procedures are communicated effectively to internal and external stakeholders, such as school districts and the public.

Foster a Culture of Fairness and Inclusion

- Fairness-focused policies: The policy administrator ensures that all policies reflect the NDE's commitment to fairness, inclusion, and access for all students and staff.
- Consistency in application: Procedures that are uniformly applied across departments promote fairness and reduce disparities in the treatment of employees and stakeholders.

Strengthen Relationships with External Entities

- Alignment with school districts: A policy administrator ensures that NDE policies are clear, consistent, and supportive of school district operations, enhancing trust and collaboration.
- Compliance with external requirements: Policies that align with federal and state mandates strengthen the NDE's relationships with oversight bodies and funding agencies.

Long-Term Organizational Stability

- Institutional memory: Policies and procedures serve as a repository of institutional knowledge, preserving continuity despite staff turnover.
- Strategic planning: A policy administrator ensures that policies align with long-term goals, providing stability and direction for the NDE's future initiatives.

A policy administrator is vital to NDE's effectiveness. This role ensures consistency, compliance, efficiency, and fairness across departments, while promoting collaboration and transparency. By centralizing policy development and oversight, NDE is better positioned to serve schools, districts, and students with clarity and purpose.

Rationale for Moving Family Engagement from Educator Effectiveness to Safe & Respectful Learning Environment

The rationale for moving Family Engagement from the Office of Educator Engagement and Licensure to the Office for a Safe and Respectful Learning Environment in a state department of education typically reflects a shift in priorities or a rethinking of how family engagement aligns with broader educational goals. The rationale includes:

Holistic Focus on Student Well-Being

- The Office for a Safe and Respectful Learning Environment emphasizes creating conditions where students feel supported, respected, and safe. Family engagement plays a vital role in fostering environments that promote:
 - Social-emotional learning.
 - Mental health and well-being.
 - Positive school climates.
- By integrating family engagement into this department, it reinforces the connection between family involvement and overall student safety, belonging, and respect.

Broader Scope Beyond Educators

- Placing family engagement under Educator Engagement and Licensure ties it closely to teacher professional development, recruitment, and retention. However, family engagement extends beyond just educators—it involves parents, guardians, and communities as key stakeholders in student success.
- The Office for a Safe and Respectful Learning Environment often has a broader, cross-cutting role, making it a more natural fit for managing family engagement initiatives.

Emphasis on Fairness and Inclusion

- Departments focused on safe and respectful learning often lead efforts around fairness, diversity, and inclusion. Family engagement is critical for:
 - Addressing disparities in access and outcomes.
 - Encouraging culturally responsive practices.
 - Building partnerships with families from underserved or marginalized communities.
- Relocating family engagement here signals a commitment to integrating families into fairness-focused work.

Strengthening Partnerships

- Families are instrumental in creating a safe and respectful environment both at school and at home. Moving the department highlights the importance of:
 - Collaborative problem-solving (e.g., addressing bullying, supporting trauma-informed practices).
 - Unified approaches between schools and families to improve the school climate.
 - Family input in designing policies that ensure safety and respect.

Streamlining Responsibilities

- The Educator Engagement and Licensure office may focus on technical, regulatory, and workforce issues, such as certification standards and teacher development. Moving family engagement to another office allows:
 - A sharper focus on the professional needs of educators.
 - The family engagement team to work on broader community-based initiatives, without being constrained by educator-specific priorities.

Alignment with Federal and State Policies

- Many federal and state policies emphasize family engagement as part of safe, inclusive educational settings. For example:
 - The Every Student Succeeds Act (ESSA) prioritizes family-school partnerships.
 - Family engagement aligns with school improvement plans, Title I, and social-emotional learning initiatives, which often fall under departments focused on school climate and student well-being.

Enhanced Public Messaging

- Families may resonate more with the idea of "Safe and Respectful Learning Environments" than with "Educator Engagement and Licensure," making the shift helpful for:

- Branding family engagement efforts.
- Communicating the department's mission clearly to parents and the community.

This realignment reflects a strategic choice to prioritize family engagement as central to building safe, inclusive, and effective learning environments for all students.

Rationale for Moving IT Manager & Tech Operations to Chief Information Systems (CISO)

The rationale for moving the IT Manager and Data Systems and Technology Operations from under Student Achievement to the Chief Information Systems Officer at NDE reflects an effort to improve alignment, efficiency, and strategic focus in managing technology and data. Below are key reasons for such a decision:

Centralized Oversight of IT and Data

- **Unified Leadership:** Consolidating IT and data operations under the CISO ensures that all technology and data-related functions are managed centrally, creating a more streamlined structure for decision-making, resource allocation, and accountability.
- **Strategic Alignment:** The CISO's office often has a broader focus on state-level technology strategy, cybersecurity, and innovation. Moving IT functions here aligns operational activities with these overarching goals.

Enhanced Data Security and Governance

- **Improved Security Measures:** The CISO typically oversees cybersecurity policies and protocols, ensuring that sensitive student data and systems are protected. Moving IT under this office strengthens compliance with data protection regulations (e.g., FERPA, state-specific laws).
- **Data Integrity and Governance:** Centralized control under the CISO facilitates better management of data accuracy, accessibility, and governance frameworks.

Operational Efficiency and Standardization

- **Avoiding Redundancy:** Having IT and tech operations under Student Achievement may create overlaps or silos in technology planning and implementation. Moving these functions to the CISO's office eliminates duplication and enhances collaboration.
- **Standardized Practices:** The CISO can enforce consistent technology standards, procurement practices, and protocols across all departments, ensuring cohesive and scalable operations.

Focus on Specialized Roles

- **Student Achievement's Core Mission:** By moving IT functions out of Student Achievement, the department can concentrate more fully on improving educational outcomes, curriculum development, and student performance metrics without being burdened by technical operational concerns.
- **IT's Specialized Focus:** The CISO's office is better equipped to handle the technical and infrastructural demands of data systems and technology operations, enabling IT teams to work more effectively.

Adaptation to Evolving Technology Needs

- **Rapid Technology Advancements:** Education technology is increasingly sophisticated and interconnected. The CISO's office is typically tasked with staying ahead of trends in tech

infrastructure, cloud solutions, and digital transformation, making it the logical home for IT operations.

- **Integration Across Departments:** Moving IT under the CISO ensures better integration of technology solutions across the entire state department of education, enabling more comprehensive and innovative approaches.

Improved Collaboration and Communication

- **Cross-Departmental Coordination:** The CISO's office often works across all departments, making it easier to align IT services with the needs of various stakeholders, including Student Achievement, without the constraints of siloed management.
- **Interoperability of Systems:** A centralized structure facilitates smoother communication and integration between different data systems, enhancing their utility for student performance analysis and other educational objectives.

Alignment with Statewide IT Goals

- **Statewide Technology Strategy:** The CISO's office often coordinates with other state agencies and aligns departmental technology policies with broader state IT strategies. Centralizing IT functions under the CISO helps ensure consistency with statewide goals and initiatives.
- **Compliance with Regulations:** Moving IT to the CISO ensures compliance with state and federal mandates related to technology and data usage.

Cost Efficiency and Resource Optimization

- **Budget Optimization:** Centralizing IT operations allows for better resource allocation, cost savings through shared services, and coordinated procurement of technology tools.
- **Specialized Expertise:** IT staff can benefit from the expertise, tools, and frameworks already established within the CISO's office, reducing duplication and improving operational efficiency.

Moving IT Manager and Data Systems & Tech Operations to the Office of the Chief Information Systems Officer reflects a strategic reorganization aimed at enhancing efficiency, security, and alignment with broader technology goals. It allows for more effective governance of technology infrastructure while enabling departments like Student Achievement to focus on their core educational missions.

Rationale for Assessment & Accountability Having a Dual Reporting Relationship

A dual reporting relationship for a state department of education's Assessment & Accountability Department to both the CISO and the Teaching & Learning Department reflects the need to integrate technical capabilities with educational priorities. The reasons include:

Bridging Technology and Pedagogy

- **Educational Alignment (Teaching & Learning):**
 - The Assessment & Accountability Department needs to ensure that assessments are aligned with curriculum standards, instructional goals, and student learning outcomes.
 - Teaching & Learning provides the pedagogical context to ensure assessments are valid, fair, and designed to measure the desired competencies.

- Technical Alignment (CISO):
 - Modern assessment systems heavily depend on technology for data collection, processing, and reporting. The CISO ensures that infrastructure, data systems, and technology tools used for assessments are secure, scalable, and functional.

Effective Use of Data

- Data Governance (CISO):
 - The CISO ensures that data from assessments is securely managed, adheres to state and federal regulations (e.g., FERPA), and is accessible for analysis.
 - It oversees the integration of assessment data systems with other educational technologies.
- Instructional Insights (Teaching & Learning):
 - Teaching & Learning translates assessment data into actionable insights for educators, ensuring it supports instructional strategies and student learning improvements.
 - A dual reporting structure ensures assessment data serves both technical (infrastructure) and instructional (educational use) purposes.

Comprehensive Accountability

- Technical Precision (CISO):
 - Ensures assessment systems are reliable, accurate, and compliant with state and federal mandates, such as ESSA.
 - Facilitates the development and maintenance of dashboards, reporting platforms, and data systems used for accountability metrics.
- Instructional Relevance (Teaching & Learning):
 - Ensures accountability measures align with educational priorities, including fairness, student growth, and school performance goals.
 - Provides guidance on how accountability metrics influence instructional practices and policy decisions.

Supporting Innovation in Assessment

- From the CISO's Perspective:
 - Advances in assessment technologies, such as adaptive testing, online platforms, and real-time analytics, require the technical expertise and strategic oversight provided by the CISO.
 - Ensures that innovations are implemented effectively and securely.
- From Teaching & Learning's Perspective:
 - Ensures that these innovations are educationally sound, fair, and support instructional goals.
 - Guides decisions on integrating innovative assessments with teaching strategies.

Balancing Short-Term Operations with Long-Term Strategy

- CISO's Focus:
 - Manages the technical, logistical, and operational aspects of assessments, such as platform functionality, data security, and statewide administration.
- Teaching & Learning's Focus:

- Focuses on the long-term educational strategy, such as how assessments evolve to measure deeper learning, critical thinking, or other 21st-century skills.

A dual reporting structure ensures that both operational efficiency and educational relevance are maintained.

Ensuring Fairness and Access

- CISO's Role:
 - Ensures fair access to assessment platforms, especially for under-resourced schools or students with disabilities.
 - Implements accommodations through technology (e.g., screen readers, language options).
- Teaching & Learning's Role:
 - Ensures that fairness considerations are embedded in assessment design and implementation.
 - Provides professional development for educators on using assessment data to address disparities.

Streamlining Cross-Departmental Collaboration

- The dual structure fosters collaboration between:
 - Technical teams (CISO) and instructional teams (Teaching & Learning).
 - Ensures that assessment systems are functional and meaningful to educators while meeting technical and regulatory standards.
 - Bridges potential gaps between infrastructure and instructional needs.

Compliance and Policy Alignment

- CISO's Responsibility:
 - Ensures compliance with technical aspects of state and federal policies related to assessment data collection, privacy, and reporting.
- Teaching & Learning's Responsibility:
 - Aligns assessments with policy goals related to student achievement, curriculum standards, and teacher effectiveness.

The dual reporting relationship ensures that the Assessment & Accountability Department effectively serves two critical functions: maintaining the technical integrity of assessment systems (via the CISO) and aligning assessments with educational goals (via Teaching & Learning). This structure enhances collaboration, ensures operational efficiency, and promotes the meaningful use of assessments to support student learning and achievement.

Read By Grade 3

Placing the Read by Grade 3 Program under Early Childhood and Development rather than Teaching & Learning in a state department of education underscores the importance of addressing literacy development as part of a child's foundational early learning journey. The reasons include:

Emphasis on Early Literacy as a Developmental Milestone

- Early Childhood Focus:
 - Early literacy skills, such as phonemic awareness, vocabulary development, and early reading comprehension, are fundamentally developed in early childhood (ages 0–8). These skills are a key part of child development, making Early Childhood and Development the natural home for such a program.
 - The focus aligns with evidence showing that children who are not proficient readers by grade 3 are more likely to struggle academically in later grades.
- Teaching & Learning Focus:
 - Teaching & Learning tends to focus on K–12 pedagogy, curriculum standards, and instructional practices, which are critical but may not emphasize the broader developmental context that is central to early literacy.

Integration with Birth-to-Grade 3 Continuum

- Holistic Approach:
 - Early childhood programs often span birth to grade 3, emphasizing the seamless development of cognitive, language, and social-emotional skills that underpin literacy.
 - Placing Read by Grade 3 in Early Childhood and Development ensures alignment with initiatives like early intervention, pre-K programs, and family engagement, which are critical for literacy success.
- Support for Early Interventions:
 - Early Childhood and Development departments often manage programs that identify and support struggling learners (e.g., developmental screenings or early interventions) well before they enter formal schooling.

Stronger Family Engagement

- Parent and Caregiver Role:
 - Early literacy success is closely tied to family involvement in reading and language activities at home. Early Childhood and Development typically has expertise in engaging families and communities as partners in early learning.
 - Programs in this department can provide resources and training to families on supporting reading readiness through storytelling, shared reading, and conversations.

Focus on Pre-Literacy Foundations

- Building Blocks for Literacy:
 - The foundational skills required for reading proficiency by grade 3 (e.g., oral language, print awareness, phonological awareness) are cultivated in the early years, often before children formally enter school.
 - Early Childhood and Development programs prioritize these pre-literacy skills, ensuring children are prepared to meet the academic demands of early elementary grades.

Alignment with Developmental Research

- Evidence-Based Practices:

- Research shows that early intervention and developmentally appropriate practices in early childhood are more effective in preventing reading difficulties than later remediation efforts.
- Early Childhood and Development departments are typically equipped to integrate this research into programming.

Enhanced Coordination with Early Learning Providers

- Collaborating with Early Learning Centers:
 - Many early literacy efforts involve partnerships with preschools, childcare centers, and Head Start programs. These partnerships naturally fall within Early Childhood and Development rather than Teaching & Learning.
 - Placing Read by Grade 3 here allows for stronger coordination with early learning professionals, ensuring continuity from pre-K to grade 3.

Equity and Access

- Reaching Vulnerable Populations:
 - Early Childhood and Development programs often focus on addressing inequities in early learning opportunities, such as disparities in access to quality pre-K or home literacy resources.
 - By situating Read by Grade 3 within this department, it becomes part of broader efforts to close achievement gaps before children enter formal schooling.

Foundation for Long-Term Academic Success

- Early Investment Pays Off:
 - Early literacy skills form the foundation for all future learning. Early Childhood and Development departments prioritize these foundational years to ensure that children enter grade 3 ready to succeed, reducing the need for later interventions.

Positioning the Read by Grade 3 Program under Early Childhood and Development ensures that it is treated as part of a child's early developmental journey, integrates seamlessly with pre-K initiatives, emphasizes family and community engagement, and focuses on pre-literacy foundations. This alignment reflects the importance of literacy as a key developmental milestone and maximizes the program's impact on long-term student outcomes.

Inclusive Education Under School Educator & Student Learning Supports

Placing the Department of Inclusive Education under School, Educator, and Learning Supports rather than Student Achievement in a state department of education underscores the idea that inclusion is fundamentally about creating the necessary supports, environments, and systems to enable all students to access learning. The rationale includes:

Emphasis on Support Systems Over Outcomes

- Focus on Removing Barriers:
 - The primary function of Inclusive Education is to ensure that systems, practices, and resources are in place to support students with disabilities, English learners, and other marginalized groups. These efforts are foundational to making education accessible and are

- aligned with School, Educator, and Learning Supports, which specializes in addressing systemic and logistical barriers.
- Indirect Link to Achievement:
 - While student achievement is the ultimate goal, inclusion is first about ensuring fair access, accommodations, and services. These are typically managed under departments focused on support rather than academic outcomes.

Alignment with Specialized Supports

- Specialized Services Coordination:
 - Inclusive Education often involves services like special education, individualized education programs (IEPs), 504 plans, English learner supports, and behavior interventions. These services naturally align with School, Educator, and Learning Supports, which manages related systems and services.
- Resource Delivery:
 - Programs like assistive technology, therapeutic services, or mental health supports are operationally managed by support departments, making them a better fit for Inclusive Education.

Holistic Approach to Learning Supports

- Wraparound Services:
 - Inclusive education is not just about academics, it's also about social-emotional learning, behavior support, and creating safe, welcoming environments for all students. These aspects are core to School, Educator, and Learning Supports, which focuses on the whole child.
- Addressing Complex Needs:
 - Many students who benefit from Inclusive Education have needs that go beyond academics, including mental health, socio-emotional development, and family engagement. These needs are more directly addressed by support-oriented departments.

Collaboration with Educators

- Training and Capacity Building:
 - School, Educator, and Learning Supports departments are often tasked with professional development for teachers and staff to implement inclusive practices, such as universal design for learning (UDL) and differentiated instruction.
 - Placing Inclusive Education here facilitates stronger collaboration in providing training and resources for educators to support diverse learners effectively.
- Co-Teaching and Collaboration Models:
 - Many inclusive education practices involve collaboration between general and special educators. Managing this under a support-focused department ensures consistent guidance and training.

Flexibility in Addressing Diverse Needs

- Customizing Support Structures:

- The School, Educator, and Learning Supports department often works with schools to develop tailored support systems based on the unique needs of their student populations, making it well-suited to manage inclusive education efforts.
- Multi-Tiered Systems of Support (MTSS):
 - Inclusive Education aligns with MTSS frameworks, which emphasize tiered interventions and supports for all students. These frameworks are typically managed by support departments rather than achievement-focused ones.

Reducing Stigma and Broadening Ownership

- Focus on Inclusion as a Support Function:
 - Housing Inclusive Education within a support-focused department helps position it as a universal effort to meet diverse needs, rather than singling out specific groups as "different" or "special."
 - This structure emphasizes inclusion as part of the overall system of supports for all students, promoting broader buy-in from educators and staff.

Collaboration with Non-Academic Support Systems

- Linking to Other Supports:
 - Inclusive Education often intersects with other non-academic areas like school counseling, health services, and community resources. These areas are typically managed under support-focused departments, making collaboration more seamless.
- Coordinating with Families and Communities:
 - Family engagement and community partnerships are crucial to inclusive education. These relationships are often better facilitated by departments focused on support systems.

Recognizing Inclusion as a Foundational Layer

- Access First, Achievement Follows:
 - Before students can achieve academically, they need to access the curriculum effectively. Inclusion, as a support system, focuses on ensuring that this access is possible for all students, including those with disabilities or additional needs.
 - Placing it under School, Educator, and Learning Supports reinforces the idea that inclusion is foundational to achievement but not solely measured by academic outcomes.

Reducing Silos

- Cross-Departmental Integration:
 - Placing Inclusive Education under a support-focused department helps avoid the perception that inclusion is solely about achievement or isolated from broader support systems.
 - It promotes integration with other support functions, such as professional development, family engagement, and socio-emotional programs.

Compliance and Resource Management

- Focus on Legal and Operational Needs:
 - Compliance with laws like IDEA (Individuals with Disabilities Education Act) and Section 504 of the Rehabilitation Act requires significant operational oversight, which aligns with the expertise of support departments.

- These departments are better equipped to manage the allocation of resources, accommodations, and services required for inclusion.

Placing the Department of Inclusive Education under School, Educator, and Learning Supports emphasizes the foundational role of inclusion as a system of supporting structures that ensures fair access for all students. This alignment highlights the importance of addressing systemic barriers, providing tailored interventions, and meeting students' holistic needs, which ultimately enable academic success. It reflects the idea that inclusive practices are a universal framework for supporting diverse learners rather than a direct measure of academic achievement.

Career Education under Future Ready

Placing the Office of Career Readiness, Adult Learning, and Education Options under Future Ready rather than Educator Effectiveness and Licensure in a state department of education reflects a strategic emphasis on aligning these programs with student outcomes and lifelong learning pathways. The reasons are:

Focus on Student-Centered Outcomes

- Direct Impact on Students:
 - Career readiness, adult learning, and education options are fundamentally about equipping students and learners with the skills, knowledge, and credentials they need to succeed in their personal, academic, and professional lives.
 - By placing this office under Future Ready, it reinforces the goal of improving outcomes for diverse learners, from high school students to adults seeking education and career advancement.
- Alignment with Postsecondary and Workforce Goals:
 - These programs are closely tied to measurable student success outcomes, such as graduation rates, postsecondary enrollment, workforce readiness, and job placement rates—all core concerns of Future Ready.

Integration with Academic and Career Pathways

- Seamless Pathways from K-12 to Careers:
 - The Office of Career Readiness focuses on career and technical education (CTE) programs, which are an integral part of a student's academic pathway. These programs must align with core academic standards and high school curricula, which fall under Future Ready.
 - Placing the office here ensures that career readiness programs are integrated into the broader academic framework, avoiding a disconnect between academic preparation and career opportunities.
- Dual Enrollment and Alternative Pathways:
 - Programs like dual enrollment, adult education, and alternative education options often require close coordination with K-12 curricula and standards. Housing these programs under Future Ready facilitates this integration.

Holistic Approach to Lifelong Learning

- Support for All Learners:

- Career readiness and adult education serve diverse populations, including high school students, adult learners, and nontraditional students. These programs aim to meet the needs of all learners by addressing academic, technical, and soft skills.
- The mission of Future Ready encompasses supporting all learners in reaching their full potential, making it a natural fit for these programs.
- Fairness and Access:
 - Adult learning and education options often target underserved populations, such as those who have dropped out, immigrants learning English, or individuals seeking GEDs. Future Ready focuses on fairness and closing opportunity gaps, aligning with these objectives.

Connection to Accountability Systems

- Data-Driven Outcomes:
 - Career readiness and adult learning programs are often measured by student outcomes, such as skill attainment, certifications, and workforce participation. These align directly with the accountability systems managed by Future Ready.
 - Housing this office here ensures that these programs are included in the broader framework of state education accountability metrics.

Collaboration with Workforce Development Initiatives

- Alignment with Statewide Goals:
 - Many state education agencies collaborate with labor departments, community colleges, and industry partners to align career readiness programs with workforce needs.
 - By placing this office under Future Ready, it emphasizes the direct role these programs play in preparing students for workforce success, ensuring alignment with both educational and economic priorities.
- Focus on Industry Standards:
 - Career readiness programs must align with industry certifications and workforce demands. Future Ready is better positioned to connect these programs to academic and skill-building efforts, rather than focusing solely on teacher licensure.

Differentiation from Educator Effectiveness

- Distinct Focus:
 - Educator Effectiveness and Licensure focuses on preparing and supporting teachers and other educational professionals. While this is important, the primary mission of Career Readiness, Adult Learning, and Education Options is to serve students directly, rather than educators.
 - Placing the office under Educator Effectiveness might shift the focus away from student-centered goals to educator preparation, which could dilute the impact of these programs.

Enhanced Collaboration with Teaching and Learning

- Instructional Alignment:
 - Career readiness and adult education often involve collaboration with departments focused on curriculum, instruction, and assessment. For example:
 - Ensuring that CTE courses align with state academic standards.

- Developing curricula for adult learners that build foundational skills (e.g., literacy, math) while preparing them for careers.
- Placing the office under Future Ready ensures stronger connections to these instructional goals.
- Dual Goals of Academic and Career Success:
 - Career readiness programs are increasingly focused on combining rigorous academic instruction with career-specific skills. Housing these programs under Future Ready ensures they are part of a cohesive academic and career development strategy.

Fostering Innovation in Education Options

- Alternative Pathways to Success:
 - Programs like credit recovery, alternative diplomas, and competency-based education are designed to help students who might not follow traditional academic paths. These options are crucial to ensuring all students achieve success and align with the mission of Future Ready.
 - Placing these initiatives under Future Ready emphasizes their role in supporting diverse learners and ensuring fairness.

Better Public Messaging and Perception

- Highlighting the Focus on Students:
 - Housing the Office of Career Readiness, Adult Learning, and Education Options under Future Ready signals to stakeholders—students, families, employers, and policymakers—that these programs are student-centered and outcomes-focused.
 - This placement avoids the perception that the programs are secondary or peripheral to the education system.

Alignment with Federal and State Policies

- Federal Frameworks:
 - Policies like the Carl D. Perkins Act (for career and technical education) and Adult Education and Family Literacy Act (AEFLA) emphasize outcomes such as workforce readiness and academic skill-building. These align with the priorities of Future Ready.
 - By placing the office under Future Ready, the department can better meet the requirements and goals of these policies while ensuring alignment with state-level education goals.

Placing the Office of Career Readiness, Adult Learning, and Education Options under Future Ready highlights its central role in supporting student success and ensuring fair access to career and educational pathways. This alignment ensures integration with academic and accountability systems, fosters collaboration with workforce development initiatives, and reinforces a student-centered approach. It also differentiates these programs from the educator-focused work of the Educator Effectiveness and Licensure department, keeping the focus squarely on learners and their outcomes.

Re-title Student Achievement as Future Ready Students

Retitling the Division of Student Achievement as Future Ready Students at NDE reflects a strategic shift in focus, branding, and priorities. The new title emphasizes preparing students for the demands of the

future, encompassing academic success, career readiness, and life skills. The importance of this change includes the following:

Focus on Holistic Preparation

- Broadening the Scope Beyond Academic Metrics:
 - "Student Achievement" often emphasizes test scores and traditional academic outcomes. "Future Ready Students" signals a more comprehensive approach, focusing on equipping students with the skills, knowledge, and dispositions they need for success in a rapidly changing world.
 - It highlights the integration of academic learning with career readiness, social-emotional skills, and adaptability.
- 21st-Century Skills:
 - The term "Future Ready" reflects a commitment to fostering critical thinking, creativity, collaboration, and digital literacy—skills essential for thriving in the modern workforce and society.

Alignment with Workforce and Postsecondary Goals

- Preparing Students for Careers and College:
 - "Future Ready Students" aligns with national and state-level priorities to prepare students not only for academic success but also for postsecondary education, workforce demands, and lifelong learning.
 - It emphasizes pathways to careers, technical education, and postsecondary success alongside traditional academic achievements.
- Economic Relevance:
 - The title resonates with employers, higher education institutions, and other stakeholders, emphasizing that the department is focused on producing graduates who are ready to contribute to the economy and society.

Emphasizing Fairness and Access

- Inclusive Vision:
 - "Future Ready Students" implies that all students, regardless of background, should have access to opportunities that prepare them for their futures. It supports fairness by highlighting the importance of meeting diverse needs and closing opportunity gaps.
- Focus on Individualized Pathways:
 - The title underscores the importance of personalized learning and multiple pathways to success, recognizing that students have unique goals and strengths.

Rebranding for Modern Relevance

- Resonance with Stakeholders:
 - "Future Ready Students" is a forward-looking, dynamic term that resonates more strongly with parents, students, and community partners than "Student Achievement," which may sound more static or narrow.

- The rebranding positions the department as innovative and responsive to contemporary challenges.
- Public Perception:
 - The new title conveys a clear and positive message about the department's mission, making it more relatable and inspiring to the public.

Supporting Lifelong Learning

- Beyond K-12 Education:
 - The term "Future Ready" encompasses not just readiness for graduation but preparation for lifelong success. It highlights the importance of adaptability, resilience, and continuous learning in a rapidly changing world.
 - This aligns with initiatives like career readiness, adult education, and digital skills development.

Aligning with National Initiatives

- Future Ready Frameworks:
 - The term "Future Ready" aligns with national initiatives like the Future Ready Schools Framework, which focuses on personalized learning, technology integration, and collaborative leadership to prepare students for college, career, and life.
 - Adopting the title aligns the division with these recognized frameworks, fostering consistency and collaboration.

Driving Innovation

- Encouraging Forward-Thinking Policies:
 - The title "Future Ready Students" encourages the division to focus on innovative policies, practices, and programs that address emerging trends and challenges in education, such as:
 - Technology integration.
 - Global competencies.
 - Climate education.
 - Entrepreneurial skills.
- Promoting Digital Fairness:
 - It highlights the need to prepare students for a digital world, addressing gaps in access to technology and developing digital literacy skills.

Inspiring Educators and Leaders

- Empowering the Education Community:
 - The rebranding can energize educators and leaders, aligning their work with a vision of preparing students for the future, rather than focusing narrowly on academic benchmarks.
 - It creates a shared mission and sense of purpose among stakeholders.

Reflecting Evolving Metrics of Success

- Beyond Test Scores:
 - The new title implies a broader definition of success, encompassing social-emotional development, career skills, and community engagement alongside academic performance.

- It aligns with shifts toward more holistic measures of school and student success.

Strategic Communication and Stakeholder Engagement

- Clearer Communication:
 - The title "Future Ready Students" is more intuitive and inspiring for communicating the division's mission and vision to the public, legislators, and business leaders.
 - It helps build stronger partnerships by emphasizing shared goals for preparing the next generation.

Retitling the Division of Student Achievement as Future Ready Students reflects a forward-thinking, comprehensive vision for education. It broadens the focus from traditional academic outcomes to holistic preparation for life, work, and continued learning. The new title aligns with modern educational priorities, resonates with stakeholders, and positions the department as a leader in preparing students for the challenges and opportunities of the future.

Retitle Student and School Support to School Improvement for All Students

Retitling the Office of Student and School Support as the Office for School Improvement for All Students reflects a shift in focus, scope, and priorities to emphasize inclusivity, fairness, and a unified approach to improving education for every student and school. This change is important for the following reasons:

Emphasizing Fairness and Inclusion

- Broadening the Scope:
 - The original title ("Student and School Support") might suggest targeted interventions for specific groups, such as English Language Learners or schools in need of turnaround. The new title ("School Improvement for All Students") emphasizes that improvement efforts are for all schools and all students, not just those receiving certain supports.
 - This aligns with a commitment to fairness, ensuring that all students, regardless of background or circumstance, have access to high-quality education.
- Destigmatizing Support:
 - The phrase "for All Students" avoids implying that support is only for struggling or underperforming schools, fostering a more inclusive and universal mission.

Aligning with School Improvement Goals

- Unified Improvement Focus:
 - The term "School Improvement" reflects a cohesive strategy aimed at enhancing the quality of education across all schools, whether they serve high-achieving populations, English learners, Title I students, or others.
 - It signals a focus on systemic change rather than isolated interventions, ensuring a collaborative approach to improvement across all departments and initiatives.
- Reflecting Federal and State Policy:
 - The term "school improvement" aligns with federal frameworks like the Every Student Succeeds Act (ESSA), which emphasizes continuous improvement for all schools, particularly those serving disadvantaged populations.

Expanding Beyond Targeted Programs

- Holistic Approach to Improvement:
 - The original title ties the office to specific programs (e.g., Title I, English Language Learners, 21st Century, and Turnaround). While these are critical, the new title reflects a broader mission to drive improvement strategies that benefit all schools, students, and educators.
 - This shift allows the office to address challenges like curriculum alignment, teacher quality, school climate, and family engagement in addition to program-specific requirements.
- Flexibility in Addressing Emerging Needs:
 - A broader title allows the office to adapt to emerging priorities, such as fairness initiatives, social-emotional learning, or new accountability systems, without being perceived as narrowly focused.

Strengthening Public Perception and Communication

- Clarity for Stakeholders:
 - “School Improvement for All Students” clearly communicates the office’s mission to parents, educators, and policymakers. It signals that the department is dedicated to ensuring every school improves and every student succeeds, regardless of socioeconomic status, language proficiency, or school designation.
- Unified Messaging:
 - The new title aligns with broader public goals of fairness, opportunity, and high standards for all, making it easier to communicate the office’s purpose and garner support from stakeholders.

Fostering Collaboration Across Departments

- Breaking Down Silos:
 - A broader title facilitates collaboration between various departments (e.g., curriculum, assessment, teacher training) to implement holistic school improvement strategies.
 - The office can be seen as a unifying force across programs, rather than a collection of distinct, isolated initiatives.
- Connecting Improvement Efforts:
 - The new name supports a unified vision for how Title I, English Learner supports, 21st Century programs, and turnaround efforts can work together under a comprehensive school improvement strategy.

Addressing All Aspects of School Success

- Incorporating Broader Measures:
 - The new title reflects the importance of improving not just academic outcomes but also other factors critical to school success, such as school culture, family engagement, access to technology, and wraparound services.
- Focus on Sustainable Improvement:
 - “School Improvement for All Students” suggests an ongoing, sustainable effort to improve all schools, not just short-term interventions for specific groups.

Shifting from Compliance to Impact

- Beyond Compliance:
 - The original title may imply a focus on compliance with specific program mandates (e.g., Title I or turnaround requirements). The new title emphasizes the impact these programs have on broader goals of school and student success.
- Driving Meaningful Change:
 - By shifting to a focus on school improvement for all, the office can lead efforts to drive systemic change rather than simply administering discrete programs.

Supporting a Growth Mindset

- Framing as Improvement for All:
 - The term “School Improvement for All Students” fosters a growth mindset, suggesting that every school and student, no matter their starting point, has the potential for growth and excellence.
 - This inspires schools to see improvement as an opportunity, not as a label of deficiency.

Retitling the Office of Student and School Support as the Office for School Improvement for All Students reflects a shift toward inclusivity, fairness, and systemic growth. It aligns with modern education priorities, communicates a clear and inspiring mission, and positions the office as a leader in driving continuous improvement across all schools and programs. By emphasizing “all students,” the new title promotes fairness, collaboration, and sustainability, ensuring that every school and student has access to the support needed to thrive.

Retitle Educator Effectiveness & Family Engagement to School, Educator, & Student Learning Supports

This change is important for several reasons:

Accurately Representing the Expanded Scope

- Beyond Educators and Families:
 - The original title, Educator Effectiveness and Family Engagement, focuses narrowly on two key areas—educator performance and family involvement—while overlooking other critical components such as school improvement, inclusive education, and safe learning environments.
 - The new title, School, Educator, & Student Learning Supports, better reflects the division's broader responsibility to provide holistic support for schools, educators, and students.
- Comprehensive Focus:
 - The inclusion of programs like Safe & Respectful Learning Environments and Inclusive Education broadens the division's mandate to address systemic supports for fairness, access, and school culture. These areas go beyond educator effectiveness or family engagement alone.

Emphasizing Holistic Support Systems

- Support for the Whole Ecosystem:

- The title emphasizes that the division is responsible for supporting the entire education ecosystem—schools, educators, and students—rather than focusing solely on specific subgroups.
- It signals that the division provides resources, policies, and practices that collectively foster a positive and effective learning environment.
- Unified Mission:
 - A comprehensive title fosters a sense of unity among diverse initiatives (e.g., school improvement, family engagement, safe learning environments) by highlighting their shared goal of creating supportive conditions for learning.

Clarifying the Role of Educator Effectiveness

- Avoiding Overemphasis on Educators Alone:
 - The previous title placed heavy emphasis on educator effectiveness, which might have given the impression that the division's primary focus was on teachers and staff. However, with responsibilities like school improvement and student learning supports, the division's work extends well beyond educator performance.
- Integrating Educator Effectiveness with Broader Goals:
 - By positioning Educator Effectiveness & Licensure as part of a larger system of supports, the new title reflects that teacher and leader effectiveness is a key driver of broader educational success rather than an isolated objective.

Highlighting Student-Centered Supports

- Focus on Fairness and Inclusion:
 - Including Student Learning Supports in the title signals a commitment to fairness, ensuring that all students—particularly those from marginalized or underserved communities—have access to the resources they need to thrive.
 - Programs like Inclusive Education and Family Engagement are critical to providing individualized and systemic supports that directly benefit students.
- Strengthening Student Achievement:
 - The title connects the division's work to its ultimate purpose: improving student outcomes through robust school environments, effective educators, and family and community partnerships.

Aligning with Safe and Respectful Learning Goals

- Creating Positive School Environments:
 - Programs under Safe & Respectful Learning Environments address bullying prevention, trauma-informed practices, and social-emotional learning. These initiatives are foundational to supporting educators and students alike.
 - The new title reflects the importance of these initiatives as part of a broader strategy for improving learning conditions.

- Systemic School Improvement:
 - With the inclusion of School Improvement for All Students, the division focuses on systemic changes that impact all aspects of a school's operation, from leadership and culture to instruction and safety.

Elevating Family and Community Partnerships

- Family Engagement as a Pillar of Support:
 - While Family Engagement was prominent in the original title, the new title situates it as one of many integrated supports that contribute to a student's success.
 - This framing emphasizes the critical role families play in collaboration with schools and educators to support learning.

Strengthening Public Perception and Communication

- Clear and Inclusive Messaging:
 - The title School, Educator, & Student Learning Supports communicates the division's mission more clearly to stakeholders, highlighting its comprehensive and inclusive focus.
 - It avoids confusion or misinterpretation that the division serves only specific groups, such as educators or families.
- Resonating with Stakeholders:
 - A broader title better reflects the division's mission to legislators, policymakers, and the public, emphasizing its leadership in creating fair, supportive, and safe learning environments for all.

Supporting Interdepartmental Collaboration

- Breaking Down Silos:
 - A unified title encourages collaboration across different programs within the division, ensuring that initiatives like educator effectiveness, school improvement, and inclusive education are seen as interconnected rather than isolated.
- Facilitating Cross-Agency Work:
 - The title promotes collaboration with other divisions, such as Student Achievement, ensuring alignment between instructional goals and support systems.

Reflecting Contemporary Educational Priorities

- Addressing Holistic Needs:
 - Modern education increasingly focuses on holistic student and school needs, including mental health, fairness, and community engagement. The new title reflects this shift.
 - It also aligns with national and state-level priorities, such as social-emotional learning, trauma-informed education, and inclusive practices.
- Adapting to Emerging Challenges:
 - A broader title allows the division to adapt its mission and programs to emerging challenges, such as learning recovery, digital fairness, and educator workforce shortages, without being constrained by a narrower focus.

Renaming the division as School, Educator, & Student Learning Supports captures its broader mission and expanded responsibilities. It emphasizes a holistic, systemic approach to improving schools, supporting educators, fostering safe and respectful environments, engaging families, and ensuring fairness for all students. This rebranding reinforces the division's leadership in addressing contemporary educational priorities while clearly communicating its purpose to stakeholders.

Exhibit 1-23 provides a summary of the proposed organizational structure. Sources for the rationale for the NDE recommended organizational changes include:

- National Association of State Boards of Education (NASBE)
- Council of Chief State School Officers (CCSSO)
- United States Department of Education
- Harvard Business Review
- McKinsey & Company

EXHIBIT 1-23

SUMMARY OF RECOMMENDED POSITIONS ADDED, FUNCTIONS MOVED, AND NAME CHANGES

Positions Added	Functions Moved		Changes to Names	
	From	To	From	To
Deputy Administrator				
Human Resources Liaison/Personnel Technician	Family Engagement under licensure	Family Engagement reporting to Safe & Respectful Learning Environments	Educator Effectiveness & Family Engagement	School, Educator and Student Learning Supports
Policy Administrator	IT Manager, (Data Management Systems, Tech Operations) under Student Achievement	IT Manager, (Data Management Systems, Tech Operations) Chief Information Systems Officer	Student Achievement	Future Ready Students
Chief Information Systems Officer	Assessment & Accountability under Student Achievement	Dual reporting relationship under Teaching & Learning for the functions of Education Technology	Office of Student & School Support	Office for School Improvement for all Students
	Read by Grade Three under Teaching & Learning	Read by Grade Three under Early Learning and Development		
	Inclusive Education under Student Achievement	Inclusive Education under School, Educator and Student Learning supports		
	Office of Career Readiness, Adult Learning & Education Options under Educator Effectiveness and Family Engagement	College & Career Readiness under Future Ready Students		

Source: Created by the Public Works LLC Team, 2025.

FISCAL IMPACT

The cost for implementing the reorganization is estimated as follows:

As a direct report to the Superintendent, the **Deputy Administrator** position should be filled at an Administrator level. The Deputy Superintendents currently earn between \$104,000 and \$115,000 plus benefits. For estimating purposes, Public Works LLC used an average annual salary of \$110,000. With approximately 50 percent in benefit costs (\$55,000), the annual cost for this position would be \$165,000.

The HR Liaison position should be filled at the manager/director's level. The position of Management Analyst III is used for estimating purposes, with an average annual salary of \$81,094. With approximately 50 percent in benefit costs (\$40,547), the annual cost for this position would be \$121,641.

Policy Administrator - Because the position requires extensive knowledge of the agency's operations, an existing employee may be identified. The position should be filled at the manager/director's level. The position of Management Analyst III is used for estimate purposes, with an average annual salary of \$81,094. With approximately 50 percent in benefit costs (\$40,547), the annual cost for this position would be \$121,641.

As a direct report to the Superintendent, the **Chief Information Systems Officer** position should be filled at an Administrator level. The Deputy Superintendents currently earn between \$104,000 and \$115,000 plus benefits. For estimating purposes, Public Works used an average annual salary of \$110,000. With approximately 50 percent in benefit costs (\$55,000), the annual cost for this position would be \$165,000.

The total five-year cost to implement this reorganizational structure is \$2,866,410.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Reorganize NDE					
Deputy Administrator	(\$165,000)	(\$165,000)	(\$165,000)	(\$165,000)	(\$165,000)
Human Resource Liaison	(\$121,641)	(\$121,641)	(\$121,641)	(\$121,641)	(\$121,641)
Policy Administrator	(\$121,641)	(\$121,641)	(\$121,641)	(\$121,641)	(\$121,641)
Chief Information Systems Officer	(\$165,000)	(\$165,000)	(\$165,000)	(\$165,000)	(\$165,000)
Total Cost	(\$573,282)	(\$573,282)	(\$573,282)	(\$573,282)	(\$573,282)

Additional Recommendation to Reorganization Finding

RECOMMENDATION 1-7:

Develop and implement a multi-year plan to foster a culture of collaboration within the department, with school districts and, while it is beyond the scope of this study, with external stakeholders as well. Consider investing in high quality executive leadership training for cabinet members and directors. The goal of such training would be to empower NDE leaders to make decisions that support the work of LEAs in a more timely manner.

In a state department of education that has issues with understaffing, low salaries compared to other state departments of education, and has, over the last seven years, had an annual turnover rate of 33 percent as well as been mired by silos generating duplicate or inconsistent directives to school districts,

implementing collaborative practices and changing the organizational culture when revising the organizational chart is critical for the following reasons:

Addressing High Turnover and Low Morale

- Impact of turnover: A 33 percent annual turnover rate suggests chronic instability, which disrupts continuity in leadership, institutional knowledge, and operations. Collaborative practices can help retain staff by fostering a sense of belonging, shared purpose, and mutual support.
- Low salaries: While salary constraints are difficult to address in the short term, creating a positive, inclusive work environment can mitigate dissatisfaction by emphasizing intrinsic rewards like professional growth, teamwork, and recognition.

Breaking Down Silos

- Communication gaps: Silos hinder cross-departmental communication, leading to duplicate or inconsistent directives to school districts. Collaborative practices encourage teams to work together, share information, and align goals, reducing inefficiencies and confusion.
- Unified vision: A siloed structure often results in competing priorities and disjointed efforts. Cultural change ensures that the organization operates with a shared vision, where all departments collaborate toward the same overarching goals for the benefit of the school districts.

Enhancing Decision-Making and Innovation

- Diverse perspectives: Collaboration brings together diverse insights, enabling more comprehensive and innovative solutions to complex challenges faced by the department and the school districts it serves.
- Consistency in directives: A culture of collaboration ensures that decisions and directives are vetted across departments, reducing inconsistencies and strengthening trust with school districts.

Improving Efficiency and Resource Allocation

- Streamlined processes: Collaborative practices help eliminate redundancies caused by siloed operations, making better use of limited staff and resources.
- Staff empowerment: When employees feel heard and valued through collaborative practices, they are more likely to take ownership of their roles, enhancing productivity and accountability.

Building Trust with School Districts

- Consistency and clarity: By fostering collaboration and cultural change, the department can issue consistent, clear directives that build trust and reliability with school districts.
- Responsive support: A collaborative culture allows the department to respond more effectively to the needs and concerns of school districts, strengthening partnerships and improving educational outcomes.

Sustaining Long-Term Organizational Health

- Resilience to change: A collaborative culture is more adaptable to changes in leadership, policies, or external challenges, ensuring that the department can maintain stability and focus on its mission.

- **Attracting talent:** A positive organizational culture that values collaboration and teamwork is more appealing to potential employees, helping to attract and retain talent despite salary constraints.

Implementing Collaborative Practices

Steps in Developing and Implementing the Plan

Developing a culture of collaboration in a state department of education facing the described challenges involves a structured, intentional approach. Below are the key steps:

Assess the Current Culture

- **Conduct a cultural audit:** Gather feedback from employees at all levels through surveys, focus groups, and interviews to understand the existing organizational culture, barriers to collaboration, and key pain points.
- **Identify silos and duplication:** Map existing workflows, communication patterns, and decision-making processes to pinpoint areas where silos and redundancies exist.

Establish a Shared Vision and Goals

- **Define the purpose of collaboration:** Clarify why collaboration is essential for achieving the department's mission, such as improving services to school districts, reducing turnover, and creating a more efficient organization.
- **Set measurable goals:** Develop specific objectives for collaboration, such as streamlining communication, reducing directive inconsistencies, and fostering cross-departmental projects.

Engage Leadership

- **Model collaboration:** Ensure leadership at all levels demonstrates collaborative behaviors by working across departments, soliciting input, and fostering transparency.
- **Empower collaborative leaders:** Train supervisors and managers to facilitate teamwork, resolve conflicts, and support a unified culture.
- **Establish a leadership coalition:** Form a team of leaders committed to driving cultural change, ensuring alignment and consistency across departments.

Redesign Organizational Structures and Processes

- **Revise the organizational chart:** Create structures that encourage cross-functional collaboration, such as interdisciplinary teams or committees with representatives from multiple departments.
- **Clarify roles and responsibilities:** Define roles to reduce redundancy and ensure accountability while enabling teamwork.
- **Implement collaborative tools:** Adopt shared platforms (e.g., project management software, communication tools) to facilitate seamless information sharing.

Build Trust and Transparency

- **Promote open communication:** Establish channels for employees to share ideas, provide feedback, and voice concerns without fear of repercussions.
- **Share information:** Regularly communicate departmental goals, successes, and challenges to keep everyone informed and engaged.

- **Celebrate wins:** Recognize collaborative successes, both big and small, to build momentum and foster trust.

Provide Training and Development

- **Offer collaboration training:** Conduct workshops on teamwork, effective communication, conflict resolution, and collaborative problem-solving.
- **Develop leaders:** Train supervisors and managers to guide collaborative efforts, mentor staff, and address resistance to change.
- **Focus on diversity and inclusion:** Ensure training emphasizes the value of diverse perspectives and fair participation.

Create Collaborative Opportunities

- **Encourage cross-departmental projects:** Launch initiatives that require input and effort from multiple departments to achieve shared goals.
- **Facilitate regular interactions:** Schedule cross-departmental meetings, brainstorming sessions, and informal gatherings to build relationships.
- **Establish mentorship programs:** Pair employees from different departments to encourage knowledge sharing and collaboration.

Align Incentives and Recognition

- **Reward collaboration:** Include teamwork and cross-departmental efforts in performance evaluations and recognize collaborative achievements through awards or public acknowledgment.
- **Incentivize participation:** Offer tangible rewards for employees and teams who demonstrate strong collaboration, such as professional development opportunities or project funding.

Monitor and Measure Progress

- **Set key performance indicators (KPIs):** Track metrics such as employee engagement, directive consistency, turnover rates, and project success to measure the impact of collaboration efforts.
- **Regularly assess culture:** Use surveys and feedback sessions to evaluate how collaboration is being perceived and practiced.
- **Adapt based on results:** Adjust strategies and initiatives based on what is working and where challenges remain.

Sustain and Evolve Collaboration

- **Embed collaboration in policies:** Make collaboration a core part of policies, practices, and the department's strategic plan.
- **Create a feedback loop:** Regularly solicit input from employees to identify new collaboration opportunities and address emerging barriers.
- **Reinforce over time:** Maintain focus on collaboration through ongoing training, leadership commitment, and alignment with organizational priorities.

By systematically implementing these steps, NDE can transform its culture into one of collaboration, breaking down silos, improving morale, and enhancing its ability to effectively serve school districts.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

SECTION 2.0: ADDITIONAL CROSS-DIVISION FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS

FINDING

NDE has made many positive strides in its effort to communicate internally and with the LEAs.

Some examples of NDE initiatives that assist in clear communication with internal as well as external stakeholders include the following:

Coffee with the Chief - This is a forum led by the State Superintendent and is held once a month. All NDE employees are invited to attend. Feedback from staff indicate they look forward to the monthly communication; however, when they cannot attend one, they indicated that there are no minutes taken at the event nor is it recorded.

Mandatory Trainings - A series of agencywide trainings occurred in the fall of 2024 on a number of topics such as policies and procedures, timekeeping, and the State Administrative Manual.

Teams Chats- Many NDE teams have their own Teams chats. There are office-wide chats as well that assist in unifying offices and encouraging collaboration among and between offices in both the Carson City and Las Vegas locations.

Lunch and Learn Coffee Chats - This recent initiative involves each NDE office creating and presenting a 30-minute overview of their office's goals and activities to share with other offices in an effort to improve cross-office collaboration.

Announcements via email - These announcements are sent via the all-staff distribution list.

The NDE Update Newsletter - This newsletter is distributed to school district superintendents, building principals, and anyone who subscribes. It's distributed twice a month (every other Thursday). LEA interviews indicate this is a welcomed forum for keeping up to date on various initiatives.

Office-specific newsletters - Samples of these newsletters can be seen at the following link: <https://doe.nv.gov/contact/newsletter-subscriptions/>

Press releases and media advisories - These communication forums are typically provided by the NDE Public Information Officer.

Social media platforms - NDE has a prominent place in social media platforms such as X, Facebook, Instagram, LinkedIn, and YouTube.

Public surveys and feedback solicitations for specific projects/initiatives

Nevada Association of School Superintendents (NASS) - Each month, NDE Leadership meets virtually with NASS officers (usually a week or two before the monthly superintendents' meeting). All superintendents have an option to add agenda items.

NDE: Navigating Nevada - NDE provides specific sessions geared toward new superintendents to assist them in acclimating to their leadership position. These sessions are typically held 1-2 hours

after the regular NASS monthly meetings. While it is primarily targeted for new superintendents, any superintendent is welcome to attend. Some of the topics presented in these sessions include school improvement, discipline and behavior, meeting the senior NDE staff, NDE organization charts, etc.

State Superintendent - recently created a one-pager flow chart on how to conduct reemployment after retirement; NDE worked with PERS to develop the one-pager which helps lessen time between when an employee retires and then can get rehired. This assists LEAs in addressing their teacher shortages. This advocacy on NDE's part was welcomed by many LEA leaders.

State Superintendent's Teacher Advisory Cabinet - Since 2018, NDE has a group of selected teachers (across the state) meet quarterly to inform and advise NDE leadership on initiatives and priorities.

State Superintendent's Principal Advisory Cabinet - Since 2020, NDE has a group of selected principals (across the state) meet quarterly for the purpose of elevating the voices of school building administrators. Principals provide the NDE leadership with their input and insights on topics such as the State Improvement Plan (STIP), student achievement, and other important initiatives.

NDE Onboarding Course in Canvas (an online learning management system) began in September 2024 and many NDE staff interviewed were very pleased to have this resource. **Exhibit 2-1** shows an overview of what is covered in the onboarding of new NDE staff.

EXHIBIT 2-1
OVERVIEW OF ONBOARDING CONTENT FOR NEW NDE STAFF

Welcome to NDE New Hire Onboarding!

This self-paced course is designed to onboard new colleagues to the Nevada Department of Education (NDE or Department). The content addresses different levels of onboarding, some of which happen sequentially and others that may happen in parallel:

- **Nevada State Employment**, which addresses the relevant paperwork and policy for all state employees
- **Location Orientation**, which will help you understand how to access and navigate your work duty location
- **NDE Employment**, which addresses the paperwork and policies needed to be set up to perform your job functions as a part of the NDE team
- **NDE Orientation**, which will teach you about key Department functions, processes, and personnel
- **Office Orientation**, which will prepare you to work within your assigned team and role (*please note that some offices' course content is still under development*)

We are glad you have joined our amazing NDE team and look forward to getting to know you better!

Source: NDE Canvas New Employee Onboarding Content, 2024.

COMMENDATION 2-A:

NDE is commended for many positive communication initiatives that serve both internal and external stakeholders.

FINDING

LEAs leadership have indicated that NDE has taken proactive steps to improve open, two-way communication on important topics, which they acknowledged as a positive step toward collaborative teamwork.

NDE took immediate action to communicate with LEAs regarding the Executive Orders released by President Trump in January 2025 which would freeze federal grant dollars.

On January 28, 2025, Superintendent Ebert called a Zoom meeting with LEAs and charter schools to discuss the executive order. The Superintendent and NDE's CFO were clear and concise with the information they had at the time of the meeting urging subrecipients to draw down as much grant funding as possible before 2:00 p.m.

When the Superintendent received word that formulaic federal funds (Title I, II, IDEA, etc.) were not affected, but federal discretionary grants were the focus, she immediately put out a list of grants Nevada school districts had for the CFO's grant team to focus on drawing down funds.

On January 31st, a second Zoom meeting was held to reinforce that the executive order is on hold. The Superintendent addressed two other executive orders and the immigration issues that could impact the districts and allowed participants to share their thoughts and provide resources.

On participant shared, "This week felt like NDE and NASS were a team." Continuing the agency's efforts to open communication on important and emerging topics, the February Nevada Association School Superintendent's meeting will focus on the following topics:

- Discipline Data and Disproportionality
- PERS (Public Employee Retirement System) Conversation
- Kindergarten Entrance Assessment (KEA)
- RBG3 Assessment Timeline, ELA Standards, and Literacy Plan Timeline
- SBAC Adjusted Blueprint
- 3–8 Summative Assessment RFP

These are the types of collaboration and communication that LEAs are seeking more of outside the informative sessions at NASS meetings.

COMMENDATION 2-B:

NDE's renewed efforts to open the lines of communication and provide LEAs and other stakeholders opportunities for meaningful feedback is resulting in positive feedback from the LEAs.

FINDING

While NDE has made strides in efforts to better communicate with stakeholders and has developed a Communication Norms and Expectations document, feedback from interviews, focus groups, and NDE and LEA surveys indicate there is much work to be done in the area of communication.

NDE Survey Results Related to Communication

Exhibit 2-2 shows how NDE staff responded to the prompt, “NDE effectively communicates policies, updates, and requirements.” As shown, 48.15 percent of NDE staff either agree or strongly agree with this statement, 34.26 percent either disagree or strongly disagree, and 17.59 percent either didn’t know or had no opinion.

EXHIBIT 2-2
EXCERPT OF NDE SURVEY RESPONSES RELATED TO COMMUNICATION

	STRONGLY AGREE	AGREE	NO OPINION/DON'T KNOW	DISAGREE	STRONGLY DISAGREE	TOTAL
NDE has adequate resources to meet district level needs.	7.41% 8	25.93% 28	23.15% 25	28.70% 31	14.81% 16	108
NDE effectively communicates policies, updates & requirements.	9.26% 10	38.89% 42	17.59% 19	25.93% 28	8.33% 9	108
NDE Divisions collaboratively provide coordinated messages & directives.	4.63% 5	33.33% 36	22.22% 24	27.78% 30	12.04% 13	108

Source: Public Works LLC, NDE Staff Survey Results, 2024.

Below are direct quotes that NDE staff made in the open-ended portion of the survey related to communication.

- *Communication is lacking (personnel in the Carson City offices seem to be privy to information sooner or in more depth than the Las Vegas office).*
- *The website is a mess, fixing this would be a massive improvement and allow for much better communication for all stakeholders.*
- *Having communication lines listed out for LEA support would help.*
- *Offices are siloed with very little cross-communication. Some offices are overly protective of their domains, leading to resentment, confusion, and ideas being missed. Communication within the department would help efficiencies if everyone had a better idea of what was happening outside their department.*
- *Some collaboration at NDE is construed as "stepping-on-toes" or "veering out of your lane." Only specific individuals at NDE can communicate with specific individuals at districts. However, when those district individuals contact someone at NDE outside of their designated level of communication, conflict at NDE ensues. This also affects the effectiveness of NDE in helping districts in a timely manner.*
- *NDE is not the same place it use to be. I honestly don't love the working environment it has become. I love my team and that is the reason I stay. Fighting daily with fiscal is exhausting, no communication is exhausting. Not getting responses back in emails is rude, and even more having certain hours that NDE staff is allowed to come talk to a team is ridiculous. Smartsheets are not the answer to NDEs issues.*
- *Lack of consistent communication, lack of leadership, and lack of focus on K-12 student achievement instead of paying lip service to the latter.*

- *The communication system relies on a hierarchy status. Do not feel we are allowed to reach out to those with the information and we have to use middlemen to get there delaying the process*
- *Those managing budgets need a better system of communication among their own team members. It is not uncommon for outside teams to receive one instruction from the right hand and then get penalized or criticized by the left hand in the same office for not doing it correctly. This results in lots of extra work for those outside of the office who are trying to follow instructions that keep changing or are misunderstood by members of the same team for which that task is held accountable.*
- *In my office, only certain people are allowed to communicate with district staff. Management maintains strict control over staff's actions, communications, etc. We are not allowed to learn anything other than our specific role.*
- *There seems to be good communication between NDE staff and superintendents and principals within districts.*
- *Transparency among staff, supervisors and directors to employees, communication is difficult and problematic, the chain of command is ridiculous.*
- *Transparent communication protocols are a huge opportunity. Another opportunity to enhance collaboration at the district level is clear communication channels to the district. There is an NDE Update that is pretty much the exclusive way to reach districts.*
- *Communication has clear messaging utilizing various communication channels. The Department uses Teams and Electronic mail equally.*
- *The Department appears to be striving to continuously improve its processes, policies, communications, stakeholder engagements, etc. For example, creating an onboarding course, doing this audit, reinstating "lunch and learns," etc.*
- *NDE seems to work in many siloed areas. We are disconnected from the LEAs and often do duplicative work with a lack of communication with other offices.*
- *ADAM is a large department, and with this being said the collaboration between each element of ADAM is flawless. We streamline communication with one another and work as a team.*
- *Good communication with LEAs. The webinars, office hours, emails, and exchanges with those partners provides value feedback in both directions.*

LEA Survey Results Related to Communication

Many of the interviews with LEA staff had a common theme: NDE has “reactive not proactive” communication. As seen in **Exhibit 2-3**, when asked if NDE provides clear, understandable directives regarding audit-related, legislative, and regulatory requirements, 42.75 percent of LEA survey respondents didn’t know or had no opinion and 32.82 either disagreed or strongly disagreed.

EXHIBIT 2-3
LEA SURVEY RESULTS RELATED TO COMMUNICATION

Q14 To what extent do you agree with the following statements on audits.

Answered: 131 Skipped: 1

	STRONGLY AGREE	AGREE	NO OPINION/DON'T KNOW	DISAGREE	STRONGLY DISAGREE	TOTAL
NDE provides clear, understandable directives to follow re: audit-related legislative and regulatory requirements.	0.76% 1	23.66% 31	42.75% 56	27.48% 36	5.34% 7	131
Communication from NDE re: program area requirements related to auditing is clear and helpful.	0.76% 1	17.56% 23	47.33% 62	29.01% 38	5.34% 7	131

Source: Public Works LLC, LEA Staff Survey Results, 2024.

Below is a sampling of LEA survey respondents' comments regarding NDE communication in the open-ended section of the survey.

- *Communication is sparse and reactive versus proactive partnership.*
- *NDE's method of communication and support, through many virtual meetings with each project, are not practical for providing effective support to a structures such as ours. We simply cannot make the number of meetings required to acquire the information, guidance and support we need.*
- *The high turnover rate within the NDE appears to contribute to miscommunication among staff members.*
- *There are areas that are highly effective and some that are not. Individuals are pleasant and willing to help, but communication structures are somewhat dictatorial. The accessibility of staff has been a problem as well.*
- *Some staff at NDE are readily available and others are not at all timely with communication (take weeks to get an email response, etc.)*
- *There is little to NO communication as to who has left and who is now in charge in many departments. Conference calls are often tense with, "That person is no longer with NDE," being the only information offered. Some of the new people coming in come across as condescending, until they have to acknowledge that the districts HAVE NOT been provided with the documentation they say has been sent out and/or the information they sent out was incomplete or inaccurate.*
- *Again, communication, guidance, funding, etc. takes an extraordinary amount of time to receive. Several requests for meetings/information are flat-out ignored.*
- *Poor and differing communication; training/resources low or not communicated properly to the people who need it; conflicting NAC all over the place that needs to be cleaned up for clear communication and transparency.*
- *The NDE staff that I work with are unable to answer questions brought forth by the LEAs in meetings stating they are waiting for upper management to provide the guidance. They have an*

inability to respond or work alongside LEAs and communicate they are unable to provide answer until their upper management provides them guidance. It appears that each NDE office works in silos. They do not work as a team. Even if they were allowed to work as a team their upper management would not allow them to provide communication or answers to LEA questions without approving it first.

- *I have felt quite frustrated with communications, coordination, and responsiveness with NDE during the last few years. The relationship with NDE and our district changed significantly since I began in this position since in 2018. I will say that I have noticed improvements over the last few months and sincerely hope that a partnership-based relationship with districts and NDE will be rebuilt.*
- *Facilitate open, direct communication lines (e.g. regular weekly open office hours, 'how-to guide' on desired communication protocols between NDE and local entities).*
- *Currently, the department is reactionary, leaving little time for planning, effective communication, clarity, and implementation. Many inefficiencies exist, creating additional work with limited resources. LEAs should be included in decision-making, project design, and communication plans. Attempts to include LEAs seems superficial and advice is often ignored or not addressed.*
- *Communication from Educator Licensure Office is frequent and proactive.*
- *Overall, messaging by each department seems inconsistent or fragmented.*
- *The Early Childhood department has alot of miscommunication on grants and usually slow to respond to our questions.*
- *All communication is late and they do not follow the school schedule. Providing information after school has started is not good customer service. The SPED area staff does not have the knowledge base to be making decisions at a state level, their decisions feel targeted.*
- *LEAs need to be included in all communications from NDE to schools. We are often left out and cannot answer questions from our sites.*
- *Within the department the program and grants team do not appear to be aligned in timelines or clear communication to LEAs on award amounts or guidelines.*
- *Constant lack of alignment or communication among departments. We offer feedback all the time and provide recommendations and ideas for improvement supported by all LEAs and these are regularly rejected for no reason except "leadership says."*
- *LEAs are held to impossible standards and deadlines and shamed for not meeting them, yet NDE misses them constantly and their lack of organization causes the emergencies to occur at the LEA level. It is an organization focused on compliance only with little understanding of what occurs at a site or district level.*
- *Bottom line, NDE needs to work together better. The communication inefficacies are untenable. You are making our job at the LEAs way harder than it has to be. I know our district would much rather work with other agencies than NDE that is how poor the communication is with most of the NDE staff*
- *I would just like to reiterate that our folks at NDE are helpful when called upon; however, LEAs often have to seek information as communication can be inconsistent and late. There does not*

seem to be a consistent manner of how and when information is sent to LEAs. We should be able to go to the website or other specifically designated place to find notices and due dates.

- *Communication, and collaboration are the two largest opportunities for improvement.*
- *I feel that the superintendents, the department and the LEAs are divided and there needs to be more open communication. This hush hush or not allowed to speak about important topics or "beating around the bush" is unprofessional.*
- *There has been an over reliance on ePAGE communication when conversations could clarify and communicate more effectively. Grants are rejected on a regular basis for immaterial changes. This generates additional workflow for everyone with little gain.*

According to NDE interviews, in March 2024, NDE hired a new Public Information Officer (PIO) II. The previous PIO resigned and took a position in higher education. **Exhibit 2-4** shows an excerpt from the position's job description. As shown, the PIO is responsible for creating a year-long strategic communications plan. As of January 2025, this plan has not been created, nor has the NDE ever had a plan according to interviews.

EXHIBIT 2-4 EXCERPT FROM THE NDE PUBLIC INFORMATION OFFICER JOB DESCRIPTION

The incoming PIO will be responsible for creating a year-long strategic communications plan, including a communications plan for informing parents and families of relevant Department initiatives and policies, and communications plans for Department initiatives. The PIO works with NDE offices and inter-agency teams to promote brands and programs, such as Nevada Ready, LifeWorks, and SafeVoice, and amplifying the Department's 2020 Statewide Plan for the Improvement of Pupils (STIP). The PIO also manages relevant initiatives and projects as assigned by the Superintendent, such as the Department's work to support awareness of and participation in the 2020 Census.

Source: NDE Public Information Officers' Office, 2024.

RECOMMENDATION 2-1:

Create an NDE strategic communications plan and update it yearly.

The PIO should lead the initiative in the development of a strategic communications plan for NDE. A comprehensive communications plan is vital for several reasons:

1. Clear and Consistent Messaging

- **Unified Messaging:** A communication plan helps ensure that all messaging from the department is consistent, clear, and aligned with the department's goals and objectives. This consistency builds trust with the public, schools, and other stakeholders.
- **Crisis Management:** A well-defined plan allows the department to respond quickly and effectively in a crisis or during periods of uncertainty (e.g., public health crises, changes in state or federal policies, or emergencies affecting schools).

2. Transparency and Accountability

- **Stakeholder Engagement:** A communication plan helps keep parents, students, teachers, administrators, and the public informed about key policies, funding, and educational priorities. This transparency fosters accountability in the department's actions and decisions.

- **Building Trust:** When information is regularly shared and easily accessible, stakeholders are more likely to trust the department's leadership and decision-making.

3. Efficient Information Flow

- **Internal Communication:** A communications plan also establishes efficient internal communication strategies for staff members within the department. This ensures everyone is on the same page and that important information reaches the right people in a timely manner.
- **Outreach to Key Stakeholders:** The plan helps ensure that communication is targeted to specific groups (e.g., educators, parents, or community organizations) with relevant information, rather than relying on one-size-fits-all messaging.

4. Public Relations and Reputation Management

- **Positive Image:** Effective communication helps the department present itself in a positive light, showing it is proactive, responsive, and concerned about the welfare of students. A communications plan can highlight success stories, new initiatives, or progress towards educational goals.
- **Public Confidence:** Well-managed communications can help build public confidence in the state's education system, especially during times of policy shifts or budget cuts.

5. Advocacy and Policy Support

- **Advocating for Funding:** A strong communications strategy can be instrumental in advocating for additional funding, supporting educational reforms, or lobbying for policy changes. By framing issues effectively and making data-driven cases, the department can garner support from lawmakers, the public, and other influential stakeholders.
- **Building Coalitions:** Communicating with other governmental agencies, non-profits, and advocacy groups can help build coalitions for larger educational initiatives, making it easier to implement significant reforms.

6. Engagement in Digital and Social Media

- **Digital Presence:** In an increasingly digital world, the ability to engage via social media, websites, and newsletters is crucial for staying in touch with a broad audience. A communications plan helps manage this digital engagement effectively, ensuring the department is visible and responsive in the online space.

BEST PRACTICES FOR DEVELOPING A STATE DEPARTMENT OF EDUCATION COMMUNICATIONS PLAN

- **Stakeholder Identification:** Identify and prioritize key stakeholders (e.g., teachers, parents, school administrators, students, local policymakers) to ensure tailored communication strategies.
- **Crisis Communication Protocol:** Develop a protocol for handling crises, including clear spokespersons, key messaging, and rapid response systems.
- **Data Transparency:** Make data and performance metrics available to the public, supporting the narrative with evidence-based communications.

- **Digital and Social Media Engagement:** Leverage digital tools to reach a broad audience, including regular updates on social media, newsletters, and email campaigns.
- **Feedback Mechanism:** Implement a system to gather feedback from stakeholders to improve communication and address concerns promptly.
- **Training and Capacity Building:** Train department staff and spokespersons on effective communication strategies, including media engagement, social media best practices, and crisis communication.

Below is a detailed outline of the key topics that should be considered in the NDE Communication Plan:

1. Executive Summary

- **Purpose:** Overview of the communication plan's objectives and alignment with the NDE's mission.
- **Goals:** High-level goals of the communication strategy (e.g., improving stakeholder engagement, enhancing public understanding of education initiatives, etc.).
- **Scope:** Summary of key activities, timeframes, and resources required.

2. Stakeholder Identification and Analysis

- **Key Audiences:**
 - **Internal:** NDE staff, school districts, educators, principals, administrators.
 - **External:** Students, parents, families, community organizations, advocacy groups, state and local policymakers, media.
- **Communication Needs:** Understanding the needs, concerns, and preferred communication methods of each audience.
- **Engagement Strategies:** Tailored approaches to engage each group effectively (e.g., newsletters for parents, webinars for educators, social media for students).

3. Communication Objectives

- **Increase Awareness:** Of key policies, programs, and initiatives (e.g., curriculum changes, funding opportunities).
- **Foster Collaboration:** Between schools, districts, and the DOE to improve education outcomes.
- **Promote Transparency:** Ensure that stakeholders have access to up-to-date and accurate information.
- **Crisis Communication:** Develop plans for communicating during emergencies (e.g., natural disasters, public health issues).
- **Enhance Public Perception:** Build trust in the DOE through proactive and positive messaging.

4. Key Messages

- **Core Messages:** Central themes or talking points that resonate with different audiences (e.g., student success, fairness, innovation in education).
- **Consistency:** Ensuring all messaging aligns with the NDE's values and strategic priorities.

- **Adaptation:** Tailoring the message to suit the audience (e.g., more technical language for educators vs. more accessible language for parents).

5. Communication Channels and Tactics

- **Digital Platforms:**
 - **Website:** Updates on policies, initiatives, resources, and events.
 - **Social Media:** Platforms like X, Facebook, Instagram, and TikTok to reach a broad audience, especially students and parents.
 - **Email Newsletters:** Regular updates for educators, parents, and other stakeholders.
- **Traditional Media:**
 - **Press Releases:** For important announcements (e.g., budget updates, new programs).
 - **Media Relations:** Building relationships with local news outlets, TV stations, and radio.
- **Public Engagement:**
 - **Town Halls:** In-person or virtual meetings to discuss key issues with the public.
 - **Surveys and Feedback:** Regular surveys of educators, parents, and students to gauge satisfaction and gather input.
- **Internal Communication:**
 - **Intranet/Email for Staff:** To keep DOE staff informed of internal initiatives and updates.
 - **Staff Meetings and Webinars:** To ensure consistent and transparent communication across the department.

6. Content Strategy

- **Editorial Calendar:** Plan for regular content across platforms (monthly themes, key announcements, event dates).
- **Content Creation:**
 - **Infographics:** Simplifying complex information (e.g., funding allocation, policy changes).
 - **Videos:** Short explainer videos, interviews with key stakeholders, or success stories from schools.
 - **Fact Sheets/FAQs:** To clarify common questions from parents, students, or the public.
- **Tone and Style:** Friendly, professional, and accessible language that reflects the department's mission.

7. Crisis Communication Plan

- **Risk Assessment:** Identifying potential crises (e.g., school safety concerns, budget cuts, pandemics).
- **Protocols:** Clear steps for how to respond quickly and transparently.
- **Message Development:** Consistent and accurate messaging during crises.
- **Channels:** Determining which communication channels will be used for crisis updates (e.g., social media, press releases, website updates).

8. Feedback and Evaluation

- **Monitoring and Evaluation:**
 - **Metrics and KPIs:** Establish key performance indicators to measure the success of communication efforts (e.g., engagement rates, media coverage, website traffic).
 - **Feedback Loops:** Mechanisms to collect feedback from stakeholders (surveys, comments, focus groups).
- **Continuous Improvement:** Process for using feedback and metrics to refine communication strategies and tactics.

9. Roles and Responsibilities

- **Leadership Team:** Key decision-makers in communication (e.g., the Commissioner of Education, PR Director).
- **Communication Team:** Staff responsible for day-to-day execution (e.g., content creators, social media managers, media relations officers).
- **Stakeholder Involvement:** Roles of external stakeholders (e.g., local school districts, parent associations, advocacy groups) in communication efforts.

10. Budget and Resources

- **Budget Allocation:** Resources required for different communication activities (e.g., staffing, advertising, events, software/tools).
- **Partnerships:** Collaborations with other government agencies, nonprofit organizations, or media outlets to extend reach.

11. Timeline and Milestones

- **Short-Term and Long-Term Goals:** Breakdown of communication objectives into actionable timelines.
- **Key Milestones:** Specific dates or periods for launching new initiatives, completing reports, or holding events.
- **Review Periods:** Set intervals for reviewing and adjusting the plan based on outcomes.

12. Risk Management and Contingency Plans

- **Potential Challenges:** Identify possible communication barriers (e.g., resistance from stakeholders, misinformation, technical issues).
- **Mitigation Strategies:** Steps to address these challenges and ensure effective communication continuity.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

Communication with RPDPs

FINDING

NDE does not have a solid communication process in place with the RPDPs.

One of NDE's key partners is the three (northeastern, northwestern, and southern) Regional Professional Development Programs (RPDPs). The RPDPs offer professional development to LEA staff focused on the content teachers teach, how they teach it, student performance, and changes in instructional strategies that result in increased student achievement. **Exhibit 2-5** shows the three key goals of the RPDPs.

EXHIBIT 2-5
MAIN GOALS OF THE RPDPs

<h2>Determining Professional Learning</h2> <p>The RPDP work targets three broad categories:</p>		
<p>1) Meeting district and charter school requests for services</p> <p>(e.g., NVACS, differentiation, student engagement)</p> <p>Project Proposals prior to start of year. (teacher retention, leadership, supporting CIP, etc.)</p> <p>Districts and/or charters reach out to their RPDP to place the request. A consultant meets with the requestor to establish goals, objectives, alignment to CIP, logistics, etc.</p>	<p>2) Fulfilling legislated mandates</p> <p>(e.g., NVACS, NEPF, Family Engagement, Multicultural Education, Financial Literacy)</p> <p>RPDP directors collaborate to provide the services in the ways that work best for their region (e.g., cross-regional, virtual, hybrid, live, in-person, and content area expertise)</p>	<p>3) Supporting individual teachers and administrators</p> <p>(e.g., coaching, classes for credit or professional learning hours, modeling, instructional rounds).</p> <p>RPDP offers courses for endorsement programs (Library Media Specialist, ELAD, Reading Specialist, GATE, Computer Science, Early Childhood) and workshops with specific topics relative to current educational needs (e.g., science of reading, SBAC)</p>

Source: RPDP's Annual Report, 2024.

A review of the RPDPs outcomes and interviews with LEAs shows the RPDPs are highly respected and provide quality professional development. Yet, interviews indicate that most NDE communications go out to the LEAs and then come back to the RPDPs through the LEAs for interpretation. The RPDPs leadership report that they are not always in the loop on bills that affect the RPDPs, and they often are caught off guard with pulling together resources to provide legislatively mandated training. There are no set meetings with NDE's leadership and/or directors and RPDPs to collaborate and strategize on upcoming training needs. Interviews indicated that NDE's Teaching and Learning staff are the most open to collaboration with the NDE. Further, NDE has an Evidenced-Based Intervention List with approximately 50 professional development partners listed for schools and districts to hire to provide professional development; however, the RPDPs are not listed on the list. NDE does have a link on their website to the three RPDPs as a resource for schools and districts, but NDE does not have a solid communication process in place with the RPDP's.

RECOMMENDATION 2-2:

Create and implement a formal NDE and RPDP communication plan to enhance collaborative professional development initiatives in the state.

In conjunction with RPDP Executive Directors, the Director of the Office of Teaching and Learning should take the lead on developing and executing the communication plan.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

LEA COMMUNICATION/BEST PRACTICES HUB

FINDING

When Public Works LLC interviewed LEA staff, one of the themes discovered is that educators would like a forum for sharing best practices with each other and a forum for quickly learning nationwide best practices regarding issues they are dealing with in the field. Among the many comments in interviews (and in the LEA survey results) included the following quotes.

- *Overall, it would be very helpful for offices to provide additional information and support on relevant topics via written guidance, best practices, manuals, their website, trainings, virtual update calls, webinars, stakeholder meetings, etc. Some offices are great at this, but others are content with the status quo and don't seem to care about helping districts complete the work they are requiring of us.*
- *Fostering the sharing of best practices between school districts. We spend a lot of time being trained but not a lot of time exchanging information and updates between school districts.*

RECOMMENDATION 2-3:

When time permits, NDE should consider establishing a Best Practice Hub for LEA staff including industry best practices for educators.

NDE may wish to see other examples from the following state departments of education:

- Florida Department of Education (FLDOE) – Florida offers a Best Practices Clearinghouse as well, which focuses on evidence-based practices in different areas such as instructional strategies, student achievement, and school climate. Florida's system allows districts to explore and share practices that have been effective in improving student performance, especially in areas like literacy and numeracy.
- Illinois State Board of Education (ISBE) – Illinois has developed various tools and resources for school districts to use in identifying best practices, particularly around educational fairness, school improvement, and student support services. The ISBE works with districts to support innovation and the implementation of successful strategies.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

NDE's annual employee performance evaluations are not conducted consistently across divisions, and there is a need to review and update all NDE staff job descriptions.

Exhibit 2-6 shows responses from NDE staff regarding performance evaluations. As shown, 42.05 percent of respondents state they agree or strongly agree that they are evaluated on an annual basis, 32.71 either disagreed or strongly disagreed, and 25.23 percent didn't know.

Additionally, when asked if their performance evaluation was fair, 44.45 percent agreed or strongly agreed, 10.19 percent either disagreed or strongly disagreed, and 45.37 percent didn't know.

EXHIBIT 2-6
NDE STAFF SURVEY EXCERPTS REGARDING PERFORMANCE EVALUATIONS

	STRONGLY AGREE	AGREE	NO OPINION/DON'T KNOW	DISAGREE	STRONGLY DISAGREE	TOTAL
The process for posting vacant positions is clear.	4.72% 5	17.92% 19	55.66% 59	15.09% 16	6.60% 7	106
Positions are filled in a timely manner.	0.93% 1	4.67% 5	22.43% 24	33.64% 36	38.32% 41	107
My performance is evaluated on an annual basis.	16.82% 18	25.23% 27	25.23% 27	13.08% 14	19.63% 21	107
The process for the performance evaluation is fair.	18.52% 20	25.93% 28	45.37% 49	5.56% 6	4.63% 5	108
My job description accurately describes the work I am expected to do.	19.44% 21	41.67% 45	12.96% 14	18.52% 20	7.41% 8	108
The "other duties" as assigned in my job description have grown in the last year.	27.78% 30	37.96% 41	25.93% 28	7.41% 8	0.93% 1	108

Source: Public Works LLC Survey of NDE staff, 2024.

Quotes regarding staff evaluations pulled from the NDE survey include, but are not limited to:

- *Recruiting qualified staff to fill vacant positions is crucial. PLEASE DO NOT just hire someone without a more rigorous evaluation system during his/her probation period.*
- *I do not have a formal job description, nor am I provided with evaluation or feedback outside of check ins with my supervisor. I have had to create hiring and onboarding protocols for my entire team over the last 18 months which has really delayed our work.*
- *I have never received a job evaluation.*
- *Additional duties are frequently added to my responsibilities, making my evaluation and performance standards inaccurate. Also, the evaluations are highly subjective and depend on the person evaluating you as different supervisors have different philosophies on evaluations.*
- *Evaluations are not uniform and not conducted on a regular schedule.*
- *There should be more emphasis on employee evaluations with greater involvement from managers. Managers should have a more prominent role in assessing performance and recognizing contributions, which would provide clearer feedback and more opportunities for professional growth and development. This approach would ensure that employee needs and feedback are prioritized, leading to a more motivated and engaged workforce.*
- *There are staff in GMU who have not had a performance evaluation in years. No one has had an evaluation in the past year, even though many staff are new and should have had a few evaluations by now. The WPS are so theoretical as to be non functional. They are not specific and*

don't have any way to measure progress or assign an evaluation grade. Too open to being subjective and basing the evaluation on personal relationships over actual productivity/work performance.

Some quotes from interviews with NDE staff include the following:

- *It is important for the Public Works team in general to try to collect information from offices about work performance standards and when did you last do evaluations. Evaluations are not being done consistently and the standards shown in the JDs are wildly different for the same classifications in different divisions and offices.*
- *Are all of the staff in a category expected to do the same level of work? JDs are generic from the state with some specificity added. What an employee in a job category does in one division should be the same as a person with same title in another division.*
- *The SID directors have been working hard to get the job classifications up to date. They are not doing annual evaluation with any consistently.*
- *The job descriptions are pretty good. Potentially they could be a little clearer. Very broad. We are supposed to have annual evals, but that has not happened. The JD describes the tasks, but does not provide details. Statewide there are rules for when evaluations are supposed to be done, but we aren't getting them.*
- *Work performance standards do not exist so performance evaluations are not being done and if they are, then it is meaningless.*
- *There is no discipline for poor-performing employees – instead they get promoted. Afraid to hold people accountable.*

RECOMMENDATION 2-4:

Ensure all NDE staff are evaluated annually and that all job descriptions are updated on a routine basis.

The Human Resources Liaison/Personnel Technician recommended previously should be tasked with creating a plan for all NDE staff to be evaluated annually and to work on updating the job descriptions as needed. Although using the state performance evaluation forms is required, there is nothing to preclude NDE supervisors from adding work performance standards specific to the position. Staff who do not meet performance standards should be provided training and ensure a corrective action plan is in place to address and resolved performance issues. Supervisors should be held accountable for monitoring the corrective action plans.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

SECTION 3.0: STUDENT ACHIEVEMENT DIVISION

OVERVIEW OF THE STUDENT ACHIEVEMENT DIVISION

The Student Achievement Division is one of three Divisions within the Nevada Department of Education (NDE). It is the largest division both in terms of FTEs (100) and the number of offices (5). The offices include:

- [Office of Assessment, Data, and Accountability Management \(ADAM\)](#) : ADAM consists of three offices: the Office of Assessment, Office of Accountability, and Office of Information Technology.
- [Office of Early Learning and Development](#) (OELD): The goal of OELD is all children, birth through 3rd grade, have access to quality early care and education across a variety of program settings. The office coordinates state-level reform efforts, which are part of a national initiative, to transform how young children learn.
- [Office of Inclusive Education](#) (OIE): The Office of Inclusive Education consists of three program areas: Special Education, Indian Education, and Gifted and Talented Education. Each program provides technical assistance and professional learning opportunities to educators and families designed to improve outcomes for all students to ensure that ALL students in Nevada are college- and career-ready upon exit from the public school system.
- [Office of Student & School Supports](#): The Office of Student and School Supports offers an array of programs and works in partnership with schools and districts to support and improve teaching and learning to help students achieve in a safe and academically challenging environment.
- [Office of Teaching and Learning](#): The Office of Teaching and Learning will support students, families, educators, schools, and districts through coaching, professional learning, and resources.

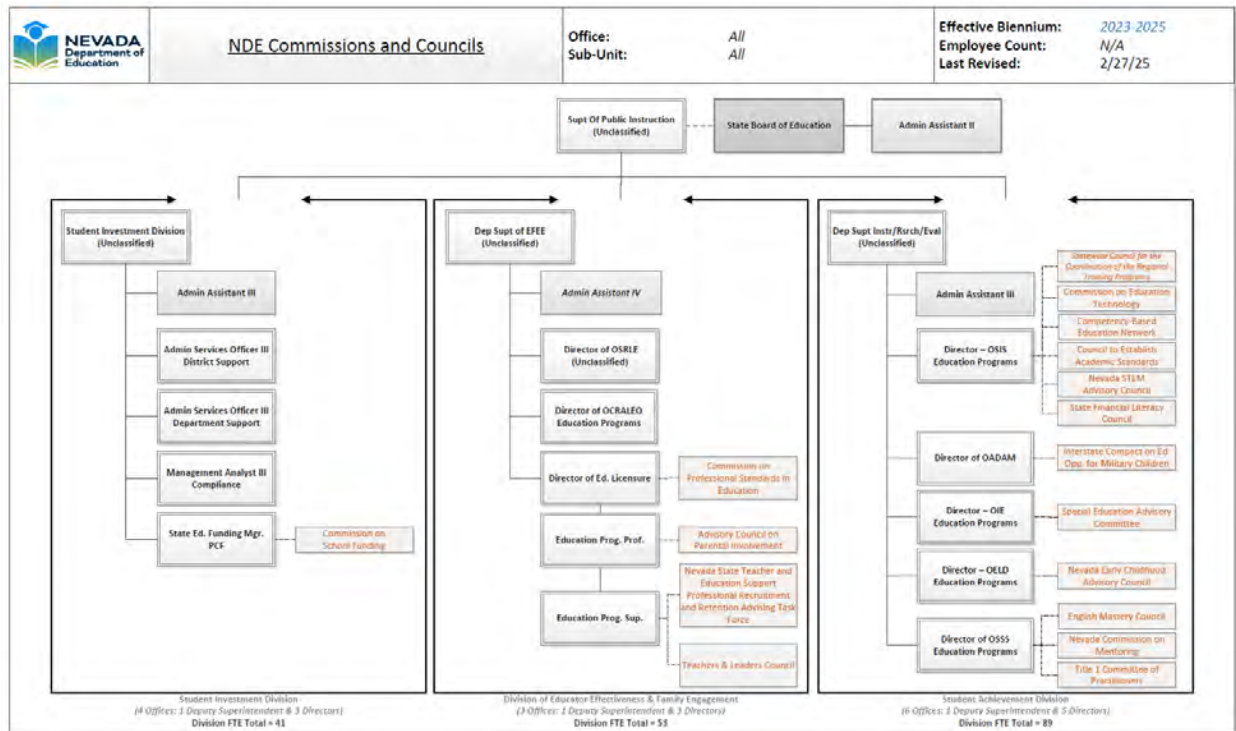
Exhibit 3-1 shows the organizational structure of the three divisions within NDE. The organizational charts for each of the offices under the Student Achievement Division can be found within each of the sections for the particular office.

The Division of Student Achievement is overseen by a Deputy Superintendent who has been in this position for two years. In interviewing key NDE leadership, several programs and initiatives were highlighted under the Division of Student Achievement including the Nevada State Performance Framework (NSPF), the Portrait of a Learner, Read by Grade 3, and the Science of Reading training for teachers. NDE leadership also pointed to challenges within the Student Achievement Division including high turnover, changes in key leadership positions and improving communication between the offices in the division as well as across NDE. However, NDE leadership was optimistic with recent hiring decisions at the Director level adding to the team of three effective directors, two new Directors to include the Office of Student and School Support (OSSS) and the Office of Teaching and Learning (OTL).

There are several Boards and Commissions under the Division of Student Achievement and within each of the offices. Some of the boards and commissions include:

- Early Childhood Advisory Council (ECAC) supported by the Office of Early Learning and Development: [Nevada Early Childhood Advisory Council \(ECAC\)](#)
- Council to Establish Academic Standards supported by the Office of Teaching and Learning: [Council to Establish Academic Standards](#)
- Special Education Advisory Council supported by the Office of Inclusive Education: [Special Education Advisory Committee \(SEAC\)](#)
- English Mastery Council supported by the Office of Student and School Support: [English Mastery Council](#)

EXHIBIT 3-1
ORGANIZATION OF THREE DIVISIONS WITHIN THE NEVADA DEPARTMENT OF EDUCATION



Source: Nevada Department of Education, February 2025.

Survey Data Highlights

Out of 131 responses in the LEA Survey, the question, “How would you rate the level of support and services provided by the Student Achievement Division and its Offices of NDE to districts and charter schools?” provided the following results:

Survey Question	Response of Good	Response of Fair
Student Achievement services provided by the Division as a whole	19.85%	37.40%
Services provided by the Assessment, Data & Accountability Management Office	20.77%	33.08%
Services provided by the Early Learning and Development Office	22.31%	17.69%
Services provided by the Office of Inclusive Education	15.27%	18.32%
Services provided by the Office of Student and School Support	12.31%	19.23%
Services provided by the Office of Teaching and Learning	16.92%	29.23%

Rates of responses under No Opinion/Don't Know ranged from a low of 34.62 percent to a high of 63.85 percent.

OFFICE OF TEACHING AND LEARNING

Current Organizational Structure:

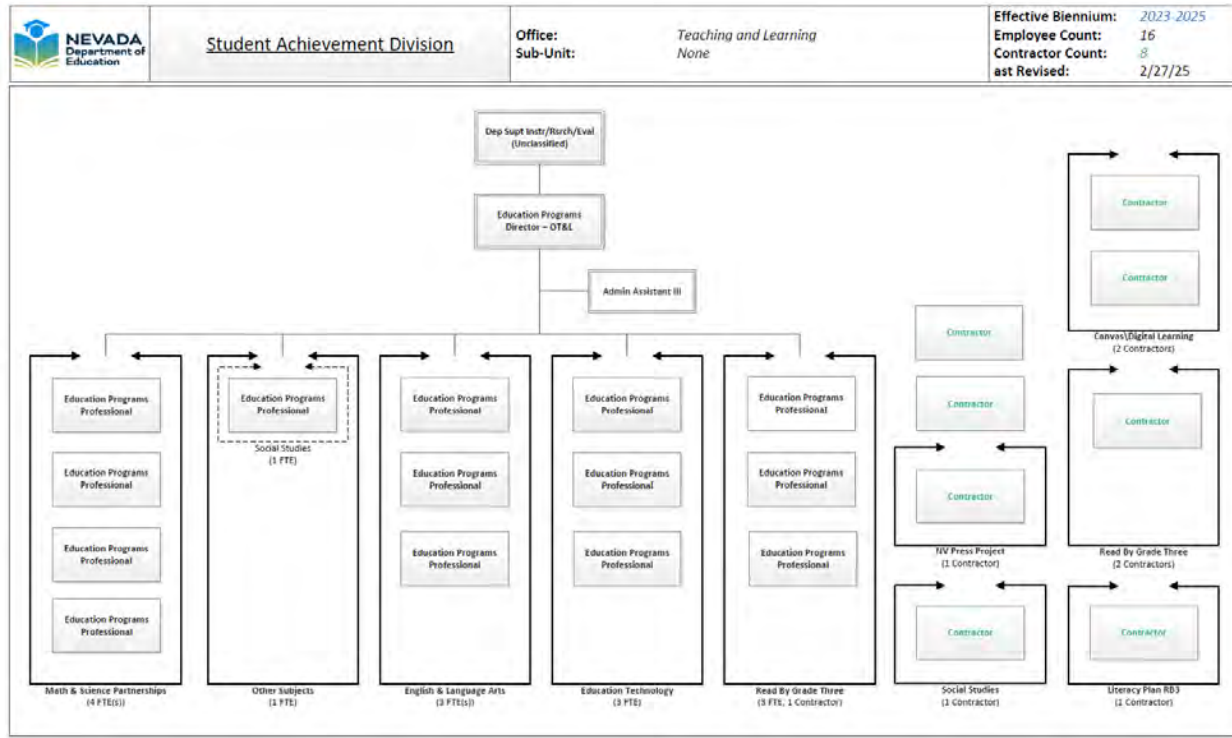
The Office of Teaching and Learning (OTL) supports high-quality instruction in classrooms across Nevada to ensure all students graduate prepared for long-term success.¹⁸ The OTL oversees the functions of the following programs:

- Nevada Academic Content Standards for nine content areas
- Read By Grade 3
- Nevada Reading Week
- Seal of Biliteracy
- Nevada Digital Learning Collaborative (NvDLC)
- Dual Credit
- Instructional Materials
- Competency Based Education

Exhibit 3-2 shows the current organizational structure of OTL. As shown, the office is overseen by a Director. In September 2024, OTL hired a new Director which reports directly to the Deputy Superintendent of Academic Achievement. Where other offices reviewed have Education Program Supervisors (ESPs) reporting to the Director, in the OTL the Education Program Professionals (EPPs) report directly to the Director. The Director has 15 direct reports, including one FTE Administrative Assistant. There are two vacant EPP positions in Language Arts and Read by Grade 3. There are also seven outside contractors completing work for OTL. As in other offices reviewed, the rationale given for the hiring of contractors is that it is “easier” to contract than to hire a full-time employee. In addition, according to NDE staff, contractors are hired based on the budgets that are approved by elected officials during each Legislative Session. For example, the Holocaust position was only funded for a contractor, not a full-time EPP.

¹⁸ NDE, CANVAS, On Boarding Class, 2024.

EXHIBIT 3-2
OFFICE OF TEACHING AND LEARNING
CURRENT ORGANIZATIONAL STRUCTURE



Source: Nevada Department of Education, Office of Teaching and Learning, February 2025.

Key Functions and Initiatives of the Office of Teaching and Learning

According to the NDE/OTL webpage, the Office of Teaching and Learning is dedicated to serving as a model for effective teaching and learning practices, providing educators with guidance on the fundamental goals of curriculum, instruction, and academic standards. The Office of Teaching and Learning's main priorities include supporting students, families, educators, schools, and districts through coaching, professional learning, and resources.

The stated vision of the OTL is Teaching and Learning envisions all students receiving high-quality Tier 1 instruction to maximize their future readiness.¹⁹

The stated values of OTL are:

- **Academic Knowledge:** Adherence to Nevada Academic Content Standards, ensuring a strong foundation of subject matter.
- **Professional Learning:** A dedication to continuous improvement and the implementation of best practices for student learning.
- **Access:** Providing access to high-quality instructional resources to support effective teaching and learning.

¹⁹ NDE/OTL website, <https://doe.nv.gov/offices/office-of-teaching-and-learning>, November 15, 2024.

- **Coaching:** Offering guidance and support to educators to enhance their instructional skills.
- **Student Voice:** Embracing a student-centric approach that values and incorporates student perspectives into the educational process.

The key functions of OTL include coordinating the approval process for instructional materials, providing guidance on state standards and instructional support to educators. Those tasks are carried out through a variety of methods and programs²⁰:

- Nevada Academic Content Standards: *The Nevada Academic Content Standards (NVACS) serve as expectations for what students should know and be able to do by the end of each school year. The standards serve as a model for effective teaching and learning by informing educators what the foundational outcomes of a course of study should be.* A history of the NVACS can be found here: <https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/27341>.
- Read By Grade 3: *With the passage of SB 391 on July 1, 2015, Nevada joined the ranks of a growing number of states focusing on a key predictor of school success and high-school graduation—the ability to read on grade level by the end of third grade. Nevada’s Read by Grade 3 (RBG3) Act establishes a statewide comprehensive system of early reading instruction and intervention aimed at accelerating the reading growth of students reading below grade level in kindergarten through third grade.*

In 2019, the Nevada State Legislature revised and enhanced Read by Grade 3 through Assembly Bill 289 (AB 289). The most notable revisions included an increase in local funding, an expanded scope from K-3 to all grade levels in elementary schools, and the requirement of an assigned literacy specialist at every elementary school in Nevada. AB 289 also removed the grade 3 mandatory retention requirement. However, AB400 put the language back in stating that students shall be retained.

- Nevada Reading Week: *The Nevada Department of Education launched Reading Week in 1987 as a state-wide initiative for Nevada teachers and librarians to celebrate reading through shared thematic activities. The Nevada Reading Week Committee consists of members from various stakeholder groups. The committee is dedicated to a year-long planning process that includes activities preceding Nevada Reading Week such as the theme selection, the statewide student art contest, and the online t-shirt store.*
- Seal of Biliteracy: *The Nevada State Seals recognize public high school graduates who have attained a high level of proficiency in multilingualism, civics, financial literacy, multilingualism STEAM, and STEM. For the Seal of Biliteracy a student must have a GPA of 2.00 (4.0 scale), demonstrate proficiency in speaking, reading, writing and listening on approved assessment. The seal would apply to seniors who took and passed an AP and/or IB exam during their 9-12 years in high school and completed all other graduation requirements.*
- Nevada Digital Learning Collaborative (NvDLC): *The NDE Digital Learning Collaborative (NvDLC) was created to support educators, families, and students implement instruction and continue learning through digital means. The NvDLC provides direction and leadership to all stakeholders to ensure every student receives high quality, standard aligned instruction no matter what the environment. This is a collaborative effort between the NDE team, digital*

²⁰ Id.

engineers, and RPDPs, which will provide support on using devices, content and curriculum, professional learning and people.

- Dual Credit: *The Nevada System of Higher Education (NSHE) and the Nevada Department of Education (NDE) partnered to develop policy recommendations to expand equitable access to dual enrollment opportunities for high school students across Nevada. Dual enrollment programs, which allow students to earn college credit while enrolled in high school, have proven highly effective in increasing high school graduation and college enrollment rates.*
- Instructional Materials: *For all content areas, the instructional material adoption process starts with vendors submitting materials for review as put forth by a Request for Quote (RFQ) issued by Nevada Department of Education (NDE). The instructional materials submitted are subject to an internal review conducted by NDE staff as per the RFQ. (More information regarding the processes used to have instructional materials approved will be provided under the Recommendation Section within this report.*
- Competency-Based Education: *Competency-based learning is a system of instruction by which a student advances to a higher level of learning when they demonstrate mastery of a concept or skill, regardless of the time, place, or pace at which the student progresses. This design empowers each learner to progress toward their individual goals at their own pace. In this personalized, competency-based learning system, each student gets what they need to reach their full potential and master competencies through flexible pathways and personalized learning supports - ensuring each learner graduates ready for what's next.*
- *In 2017, Assembly Bill 110 created the opportunity for schools in Nevada to participate in a competency-based education network and pilot program. From there the effort has grown to include the [Nevada Portrait of Learner Project](#) and the [Nevada Future of Learning Network](#).*
- *According to NDE staff other duties of OTL include the following:*
 - *Review/audit school plans and provide feedback to LEA's on SLP*
 - *Create, disseminate and train various guidance documents within content areas*
 - *Make presentations to and updates to the State Board of Education*
 - *Oversee multi-million dollar grants including RPDP and PBS*
 - *Manage, train and support digital learning management system for all LEAs*
 - *Organize, host and run various public meetings and councils including Financial Literacy, RPDP State Council, PBS Board, and Holocaust Committee*
 - *Further develop digital learning across content including the creation of an AI Ethics document*
 - *Organize and host various content conferences and professional learning for the state*

As illustrated in **Exhibit 3-3**, the budget for OTL is under Budget Codes 2675 and 2713. Under Budget Code 2675, designated for Standards and Instruction, are the Object Codes that describe the budgeted use of the funds and the program. Under Budget Code 2713, designated for Literacy Programs, are the Object Codes that describe the budgeted use of the funds and the program. The budgets below are for the biennium of FYs 24 and 25.

EXHIBIT 3-3
BUDGET INFORMATION FOR THE OFFICE OF TEACHING AND LEARNING

2675	Category	Tot FY 2024	Tot FY 2025
1	PERSONNEL	\$1,407,555	\$1,533,436
2	OUT-OF-STATE TRAVEL	\$20,920	\$19,025
3	IN-STATE TRAVEL	\$12,247	\$12,247
4	OPERATING	\$17,774	\$9,450
5	EQUIPMENT	\$309	\$0
8	CANVAS LEARNING MANAGEMENT SYSTEM	\$257,191	\$2,411,656
11	COMPETENCY BASED EDUCATION	\$488	\$488
12	INDIRECT COSTS	\$196,330	\$206,077
26	INFORMATION SERVICES	\$16,977	\$9,994
31	NEVADA READY 21	\$2,208	\$2,208
32	TECHNOLOGY COMMISSION	\$28,225	\$8,225
40	GEER PROGRAMS	\$0	\$0
58	COMPUTER EQUIPMENT SB500	\$2,404	\$164
82	DEPARTMENT COST ALLOCATION	\$2,911	\$2,911
87	PURCHASING ASSESSMENT	\$84	\$84
88	STATEWIDE COST ALLOCATION PLAN	\$2,310	\$3,243
93	NOT DESCRIBED	\$28,890	\$0
	TOTAL	\$1,996,823	\$4,219,208

2713	Category	Tot FY 2024	Tot FY 2025
1	PERSONNEL	\$398,697	\$365,619
3	IN-STATE TRAVEL	\$3,923	\$3,923
4	OPERATING EXPENSES	\$4,865	\$3,692
11	READ BY THREE	\$180,290	\$185,000
12	INDIRECT COST	\$130,501	\$111,519
13	STATE LITERACY PLAN	\$210,534	\$249,200
14	NEVADA READING WEEK	\$47,000	\$47,000
26	INFORMATION SERVICES	\$3,284	\$2,499
58	COMPUTER EQUIPMENT SB500	\$2,404	\$164
82	DHRM COST ALLOCATION	\$873	\$873
87	PURCHASING ASSESSMENT	\$30	\$30
	TOTAL	\$982,401	\$969,519

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

Plan for the Work of the Office of Teaching and Learning

The work of the Office of Teaching and Learning focuses on providing districts, schools, and classrooms with the educational standards, curriculum, educator recognition, and professional development needed within the classroom walls. With information garnered through interviews with Teaching and Learning staff as well as through a search of the NDE website, several projects are underway.²¹

A few examples include:

²¹ Id.

- In the area of Literacy, the **Read by Grade 3** initiative includes four **Science of Reading** projects to support this work. They include:
 - The **Nevada PRESS Project (Path to Reading Excellence at School Sites)**: NDE is partnering with the University of Minnesota Center for Applied Research and Educational Improvement to offer a series of free professional learning cohorts in literacy for elementary educators that is aligned to the Science of Reading. In addition, PRESS will offer two customized cohorts for site administrators on the Science of Reading.
 - The **Modified Reading Endorsement and School Administrator Course Development Project**: The intent of this project is to modify the courses presently listed in Nevada’s NAC 392.285 “Endorsement to Teach Reading” by aligning them to the Science of Reading. An additional course on the Science of Reading will be developed specifically for Nevada school administrators. These asynchronous courses will be housed in NDE’s online professional learning system where remote access will be offered to Nevada educators at no charge.
 - **Nevada’s 2024 Pre-K through Grade 12 Summer Literacy Institute** – Integrating the Science of Reading into the Theory and Practice of Reading Instruction: NDE and the University of Nevada, Reno will partner to provide a unique training opportunity for reading instruction across all grade levels. This free three-day institute will establish a statewide level of understanding and classroom application of the Science of Reading for Nevada teachers and literacy leaders.
 - **Nevada Substitute and Nevada Paraprofessional Educators Skills Development Programs**: Current and future Nevada substitutes and paraprofessionals will learn how to support elementary students in the development of critical reading skills in alignment to the Science of Reading. Scholarships for tuition and fees are available. These programs will be offered by the College of Southern Nevada, Great Basin College, Truckee Meadows Community College, the University of Nevada, Las Vegas, the University of Nevada, Reno, and Western Nevada College.
- In the area of technology, the **Nevada Digital Learning Collaborative (NvDLC)** includes the development of a website through the NDE to host curriculum, discussions, and professional learning. Additionally, NDE has entered a partnership with Discovery Education Experience and Instructure (CANVAS Learning Management System). These new resources are available for all districts and charter schools that opt-in to use them. Resources can be found at: [Nevada Digital Learning](#).
- In the area of bilingual education, the NDE established the implementation of the **State Seal of Biliteracy** (NRS 388.591). In May of 2024, two work sessions were held with school and district representatives. The purpose of the work sessions was to (1) clarify definitions found to be confusing by schools and districts regarding the Nevada State Seal of Biliteracy language in NRS 388.593 and (2) to align districts and schools across Nevada in the implementation of testing and the awarding of the Nevada State Seal of Biliteracy. A “Best Practice” document was the outcome of the work sessions and can be found here: [Memo](#).
- In the area of dual credit, the **Nevada System of Higher Education (NSHE)** and the NDE partnered to develop policy recommendations to expand equitable access to dual enrollment opportunities for high school students across Nevada. A **Dual Enrollment Task Force** made up of stakeholders from across K-12 and higher education met from December 2020 to October 2021. The Dual Enrollment Task Force was charged with making specific recommendations to the

NSHE Chancellor and the State Superintendent of Public Instruction that address the key challenges to broad implementation of dual enrollment with a focus on ensuring equitable access. A report was drafted and delivered with recommendations. The report can be found here: [Task Force Report](#).

To inform the Task Force's goal of expanding equitable access to dual enrollment, NSHE developed a Dual Enrollment Data Dashboard which includes information for each academic year on the number of high school students (freshman through senior standing) who are enrolled in an NSHE dual and/or concurrent enrollment course; the number and percentage of high school students who graduate having had a dual and/or concurrent enrollment experience in high school; and the number and percentage of Nevada high school graduates with a dual and/or concurrent enrollment experience that continue to NSHE and enroll immediately following high school graduation. The dashboard can be found here: [Dual Enrollment Data Dashboard](#).

- As the primary office, OTL has two main efforts in the area of Competency Based Education:
 - Nevada Portrait of a Learner (<https://www.portrait.nvfutureoflearning.org/>)
 - Nevada Future of Learning Network (<https://nvfutureoflearning.org/>)
- In the area of recognition, the **Presidential Awards for Excellence in Mathematics and Science Teaching (PAEMST)** is a program enacted by Congress in 1983. It is administered by the National Science Foundation (NSF) and gives a total of 110 awards to science, technology, engineering, and/or mathematics (STEM) teachers from each of the U.S. states and jurisdictions each year. PAEMST is the highest recognition a K-12 educator may receive for outstanding STEM teaching from the United States Government. See here for recent awardee information: [Two Nevada Teachers Named State Finalists for PAEMST Award](#).

FINDING

In interviews with staff, it was reiterated that having another staff member for support and to go to for help was important to staff. New staff members appreciated having long-term staff available to help answer questions and navigate such items as travel reimbursement, time sheets, and sick time. This was especially noted during leadership changes at the Director level. OTL staff also felt supported by peers even though personnel are physically separated by having staff located in the two offices of Las Vegas and Carson City.

COMMENDATION 3-A:

The OTL staff collaborate within the Office and provide one another with peer support, which has been greatly needed during leadership changes.

FINDING

With legislation (NRS 388.429, NRS 388.443) regarding identification and the providing of instructional supports for students with or at-risk for dyslexia, the NDE was charged with providing materials to LEAs and other stakeholders. Using experts at the national, state, and local levels, several documents were developed. The documents were shared with LEAs as well as with community groups and stakeholders across the state of Nevada. All of the documents are also posted on the NDE website.

COMMENDATION 3-B:

The OTL developed, in coordination with the Office of Inclusive Education, a resource guide for LEAs, charter schools, and community partners on the topic of [Dyslexia](#). The resource guide has become a valuable resource for LEAs to support educators, families, and the larger community.

FINDING

The Portrait of a Learner is a statewide initiative designed to engage the entirety of communities to develop educational pathways for students. Through in-person workshops the initiative has reached over 400 students, completed over 900 surveys with over 4,000 responses, and has over 100 Business Partners. *“This vision for what it means to graduate from Nevada’s schools is deeply rooted in ongoing work to develop and elevate the Portrait of a Nevada Learner. The Portrait is a collective vision of the future-ready mindsets and skills that bring academic knowledge to life, co-developed by Nevada educators, learners, families, businesses, and community members in 2021 and 2022.”*²² Importantly, the emphasis is a “bottom up” approach to build engaging pathways for all students.

The Public Works LLC survey of LEAs confirms that the Portrait of a Learner initiative has been a welcomed and well-supported NDE initiative.

COMMENDATION 3-C:

The Portrait of a Learner initiative has broad support from the LEAs, community stakeholders, and NDE staff.

FINDING

The current staffing level in OTL is not able to effectively and efficiently support, provide guidance, and offer professional development opportunities to LEAs.

In interviews with both internal and external staff, a review of the organizational structure and survey data it is evident the Office of Teaching and Learning requires additional staff to carry out its mission of providing support to LEAs. Notably, interviews with staff found there was agreement among content focused staff (ELA, math, science, etc.) they were not able to spend greater time with LEAs because of their current workloads. Staff believe this has resulted in LEAs not being able to receive more in-depth professional development when requested. As one staff member stated, “I am over (a particular subject), and I am only able to spend 30% of my time on this because of my other responsibilities.” The employee further explained these additional responsibilities typically have nothing to do with their content area. As an example, one of the tasks that consume a large amount of staff time are the requirements for Open Meeting Law (OML) and the staffing of committees that are required to adhere to OML.

The addition of such areas as STEM, STEAM, Artificial Intelligence (AI), Distance Education, Dual Credit, and the Science of Reading have increased the need for expertise in providing LEAs with support and professional development; however, the increase in FTEs within OTL to support this work has not kept up with the demand. This has led to staff feeling overwhelmed at times as well as staff working overtime to complete projects. Some staff members reported working 12-hour days with any overtime having to be reviewed for approval as well as comp time being “maxed out” for approvals.

²² Nevada Commission on Innovation and Excellence in Education, December 2024.

Another need reflected through interviews was lack of support from leadership; specifically, the absence of an Education Program Supervisor (EPS) within OTL. In interviews, it was highlighted that before the division of ADAM and OTL (according to staff this occurred back in 2016), there was an EPS position. This position was placed within ADAM, and OTL has not had an EPS position since that time. The span of control is large for the one director over OTL and is compounded by the fact that OTL is split between the Las Vegas and Carson City offices.

RECOMMENDATION 3-1:

Add seven FTEs to OTL to assist in providing quality services to LEAs.

To provide leadership support, the addition of an EPS position is recommended for OTL. Additionally, to increase EPP positions in the content areas of ELA (including Read by Grade 3), math, science, social studies, educational technology (including AI), and World Languages, one FTE for each of those areas is recommended, for a total recommended increase of seven FTEs.

Although the following data elements are found in Appendix A of this report, they are worth emphasizing within this recommendation and context of adding FTEs in the OTL:

- With 197 employees, Nevada has the fewest staff among the states analyzed, translating to a high student-to-staff ratio (2,458 students per employee), which can strain resources, reduce service efficiency, increase staff turnover, and elevate employee workload. This is significantly higher than ratios in Oregon (781) and Tennessee (1,108). While Nevada prioritizes student support and data accountability, its educational development staffing lags, potentially impacting educator support.
- Nevada's student enrollment increased 141 percent from 1990 to 2022, as shown in **Exhibit 3-4** below.

EXHIBIT 3-4
NDE STUDENT ENROLLMENT GROWTH

State	Fall 1990	Fall 2000	Fall 2012	Fall 2022	% Change 1990 to 2022
Arkansas	436,286	449,959	486,157	493,130	13%
Kentucky	636,401	665,850	685,167	660,029	4%
Nevada	201,316	340,706	445,707	484,192	141%
Oregon	472,394	546,231	587,564	577,335	22%
Tennessee	824,595	909,161	993,496	1,006,752	22%
Utah	446,652	481,485	613,279	691,906	55%

Source: NCES, 2024.

Implementation Steps

If several positions were requested through the budgeting process in the upcoming 2025 Legislative Session, OTL should begin to plan for the following possible outcomes:

1. All OTL positions were approved;
2. Some of the OTL positions were approved; or
3. None of the OTL positions were approved.

In developing plans for each possible outcome, it will be necessary for OTL leadership to have a granular understanding of the current work, projects, and initiatives being undertaken by OTL staff. This is an important step to see workloads across all staff (see also **Findings/Recommendations 3-2 and 3-5** on Contractors) and ensure there is a fair distribution of the work. It should be noted that some work plans, projects, and initiatives will entail longer periods of time, are ongoing, or have specific completion dates.

Next, there should be agreement within OTL that additional projects or initiatives need to be vetted by OTL leadership before they are undertaken. Having a clear understanding of the priorities of OTL will be critical throughout this implementation plan. While the term “passion project” has been used in interviews to describe projects that were of high engagement and interest to staff, if they are not a priority to the overall mission of OTL they should be reviewed as well.

Once a clear plan of work has been developed and job duties assigned, depending upon the outcomes identified above, OTL should begin the task of posting, recruiting, and hiring staff to fill the number of approved FTEs. It is also recommended to review other state departments of education organizational structures for opportunities to increase efficiency and support to LEAs. The following state department of education organizational charts are offered as examples:

- Utah: [USBE Organization Chart](#)
- Delaware: [Organizational Chart – Delaware Department of Education](#)
- Vermont: [Vermont Agency of Education Organization Chart](#)
- Maryland: [Maryland State Department of Education Organization Chart](#)

FISCAL IMPACT

The average salary for an EPP is \$84,838 and for an EPS is \$88,901 plus 50 percent budgeted for benefits. Salary ranges for EPS positions are a minimum of \$79,747 and maximum \$119,662. Salary ranges for EPP positions are a minimum of \$76,315 and maximum of \$114,254.

The following calculations are based on the recommendation of one EPS FTE and six EPP FTEs:

1 EPS FTE \$79,747-\$119,662
6 EPP FTE \$457,890-\$685,524

The costs would be posted in the fiscal year the hiring of the position takes place and pro-rated for the month of the hiring during the fiscal year. For example, if the position is hired on July 1 of FY26 there would be a full year of costs associated with the position. The Fiscal Impact chart below represents the average cost of implementing all seven FTE positions recommended and is dependent upon which end of the salary range the new FTEs are hired.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Add one EPS FTE position to the OTL (including benefits)	(\$133,351.50)	(\$133,351.50)	(\$133,351.50)	(\$133,351.50)	(\$133,351.50)
Add six EPP FTE positions to the OTL (each position at \$127,257 including benefits)	(\$763,542.00)	(\$763,542.00)	(\$763,542.00)	(\$763,542.00)	(\$763,542.00)
Total Cost	(\$896,893.50)	(\$896,893.50)	(\$896,893.50)	(\$896,893.50)	(\$896,893.50)

FINDING

Similar to OSSS, the OTL utilizes contractors to perform job tasks or complete projects that should be delegated to NDE staff within OTL.

As stated for OSSS, while the use of contractors is at times necessary because of expediency or specialized skills the contractor may possess for a particular project, the long-term hiring of contractors should be limited or eliminated. Similar to OSSS, interviews with both full-time NDE staff as well as contractors in the OTL revealed the work being carried out by the current contractors is not work that requires special skill sets from contractors. The work being contracted is within the regular scope of work for the OTL and OTL staff job descriptions.

In staff interviews and in a review of the organizational chart for OTL, the following projects and job tasks for **seven contractors** were identified:

- Development of the NV PRESS Project
- Implementation of CANVAS
- Creation of Digital Learning catalog
- Monitoring Read by Grade 3 implementation
- Draft Nevada Literacy Plan
- Development of AI Guidelines

RECOMMENDATION 3-2:

With the understanding that all work focusing on the support of LEAs/schools is the priority while adhering to federal and state law, OTL should reduce and eventually eliminate contracting positions that entail work which should be completed by internal NDE staff.

Like OSSS, the goal should be a reduction and eventual elimination of contracting positions that are not for specialized projects or require specialized skills. OTL should re-focus efforts on the purpose of OTL: *To serve as a model for effective teaching and learning practices, providing educators with guidance on the fundamental goals of curriculum, instruction, and academic standards.*

In conjunction and in coordination with the previous Recommendation and Implementation Steps of adding FTEs to OTL, there should be a clear understanding of the current workloads within OTL. Any current project or initiative currently being carried out by a contractor that is not deemed as mission critical should be thoroughly re-evaluated.

As with OSSS, OTL leadership should begin with a thorough review of the work being completed by all OTL contractors currently under contract. This review should include charting work that is mandated or required by federal or state law (i.e., Read By Grade 3), work that is necessary due to alignment with the NDE's Strategic Plan (i.e., Nevada Literacy Plan), projects contractors have undertaken due to lack of full-time NDE staff (i.e., CANVAS catalog), and additional projects assigned to contractors (i.e., Development of AI Guidelines). After completing a charting of all work being conducted by contractors, and taking into consideration the end date of current contracts, OTL leadership and staff should plan to eliminate any projects not supporting the main purpose of OTL as well as the NDE's STIP. A prioritized list should then be created highlighting the project, the purpose of the project, how the project relates to the purpose and mission of OTL, and the duties required to carry out the project.

Also, like OSSS, through this process, any projects with a specific end date should be eliminated and only work that has no end date should be left on the priority list. An example would be the work being done to monitor implementation of Read By Grade 3; that work, currently being done by a contractor, will continue for the foreseeable future. Once this list is completed, work/projects can be assigned to current OTL staff (or future FTEs if approved through budgeting process). A significant and critical apart of this process will be the “clearing of the deck” of work being carried out by full-time OTL staff. A thorough review by the new OTL Director of every OTL staff member’s current workload and job description is imperative. For OTL, this is critical because if new positions are *not* approved, there will need to be important decisions made on the mission critical projects and initiatives. Finally, and as with OSSS, a critical and ongoing component to this effort will be for OTL leadership and staff to make the commitment to not start any new initiative or project without a thorough vetting process against the backdrop of the main purpose of the OTL.

FISCAL IMPACT

Depending upon the funding source used to pay for the contractor, the eventual elimination of the contracting position would free up funding to be used for the additional FTEs for OTL. The total savings if this recommendation is fully implemented are estimated at a range of between \$509,600 to \$276,640.

EXHIBIT 3-5
ESTIMATE SALARY COST OF OTL CONTRACTORS

Position	Pay Rate per HR	Number of hours worked per Year	Total Cost per Contractor	Number of positions	Total Cost
FT Contractor	\$35.00	2,080	\$72,800	7	\$509,600
FT Contractor	\$36.50	2,080	\$75,920	7	\$531,440
FT Contractor	\$38.00	2,080	\$79,040	7	\$553,280
PT Contractor	\$35.00	1,040	\$36,400	7	\$254,800
PT Contractor	\$36.50	1,040	\$37,960	7	\$265,720
PT Contractor	\$38.00	1,040	\$39,520	7	\$276,640

Source: Based on NDE salary information for contractors, 2024.

As illustrated in **Exhibit 3-5**, at a rate of between \$35.00/hr. to \$38.00/hr. with 40-hour work week (2,080 hours per year) would total between \$72,800.00-\$79,040.00 per contractor. With a total of seven contracting positions, a total amount of funding used for contractors calculates to between \$509,600.00-\$553,280.00 a year. Even if the amount is calculated at 20 hours per week (1,040 hours per year), this still costs NDE \$254,800.00-\$276,640.00 annually that could be used for FTEs or other supports.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Eliminate contracting positions in OTL that entail work which should be completed by internal NDE staff	\$254,800-\$553,280	\$254,800-\$553,280	\$254,800-\$553,280	\$254,800-\$553,280	\$254,800-\$553,280
Total Savings	\$254,800-\$553,280	\$254,800-\$553,280	\$254,800-\$553,280	\$254,800-\$553,280	\$254,800-\$553,280

FINDING

The Textbook/Material Adoption Process currently in use by the NDE/OTL is lengthy and hinders the LEAs' ability to have textbooks adopted in a timely manner.

The adoption of textbooks/materials for all public schools (with the exception of charter schools) in the state of Nevada is governed by Nevada Revised Statutes (NRS) [NRS: CHAPTER 389 - ACADEMICS AND TEXTBOOKS](#) and Nevada Administrative Code (NAC) [NAC: CHAPTER 389 - ACADEMICS AND TEXTBOOKS](#).

Importantly, at the time this Finding/Recommendation was written, the NDE had placed a "pause" on the material/textbook adoption process. According to staff, the Nevada State Board of Education (SBE) Instructional Materials Ad Hoc Committee's findings will be used to move the process forward in the 2026-27 school year. According to LEA staff, the "pause" has placed school districts in the unfortunate situation of not being able to have new materials/textbooks approved for use until the findings are reviewed by the SBE. It is also not clear as to how the "pause" was communicated to LEAs.

In interviews with both OTL staff and LEAs, it was noted that the current process to adopt textbooks/materials is inefficient and has led to districts having out-of-date materials in classrooms. The process takes approximately 253 days from the when the Adoption Cycle begins to the posting of approved Instructional Materials. The new Director of OTL has listed reviewing the entire process as a top priority. Although it is defined in NRS and NAC, the "how" of the adoption process is under the discretion of the NDE.

To have a cycle of NVACS adoption and then textbook/material adoption, OTL, in a March 2021 presentation to the SBE, provided the following as an adoption timeline:

Year	NVACS Adoption	Instructional Materials Adoption
2019-20	Computer Science, Health	Computer Science, Science
2020-21	No standards adopted during this year	Social Studies, World Languages
2021-22	Physical Education	Fine Arts, English Language Arts
2022-23	World Languages	Health, Mathematics
2023-24	No standards adopted during this year	Computer Science
2024-25	English Language Arts/English Language Development, Mathematics	Physical Education, Science
2025-26	Fine Arts, Social Studies	Social Studies
2026-27	Computer Science, Health, Science	World Languages

One of the issues pointed out by OTL staff in the current process is that all vendors who participate in the Request for Qualification/Information (RFQ) must be reviewed by the NDE while LEAs only use a fraction of the vendors. The purpose of this review is to make sure textbooks/materials contain adopted Nevada Academic Content Standards (NVACS) as well as a review for fairness and bias. It was also noted in interviews, with the current staffing in the OTL, there is limited manpower to engage in such a review process and lengthens the time of adoption. It was also pointed out in one LEA interview that although this step of reviewing for NVACS compliance by the NDE is a time saver for school districts, the former process was much timelier. The former process included the following steps and details:

1. Districts were in control of timelines and the entire adoption cycle.

2. Districts completed Requests for Purchasing (RFPs).
3. Districts then reviewed the materials for NVACS, bias and fairness.
4. Districts then brought the selected materials to their Boards for possible approval.
5. If the Board adopted the materials, the materials then went to the NDE and the SBE for approval.
6. The final step was the posting by NDE of an approved list of adopted materials. Districts could then refer to this list to select adopted materials.

The **current** textbook/material adoption process is shown in **Exhibit 3-6**:

EXHIBIT 3-6
INSTRUCTIONAL MATERIALS PROCESS

Steps	Actions	Entities	Tasks	Outcomes	Timeframe*
1	RFQ	NDE	Develop, secure approvals for, and release Nevada-specific RFQ.	Specify requirements and provide publishers with a window in which to submit materials.	30 days July-August
2	Submit materials	Publishers	Publishers submit materials in digital/online formats.	Publisher submissions are time stamped and logged upon receipt.	30 days August-September
3	Conduct internal technical review	NDE	Verify that submitted materials meet the RFQ requirements; where available summarize ratings from appropriate National Review Panels.	Materials that meet technical review criteria move on to the Content Area Review Panels. Publishers of non-compliant materials are notified.	21 days September
4	Evaluate and rate instructional materials	Review Panels	Conduct independent reviews followed by a full panel deliberation and then prepare a report of findings. Review Panel curates a report of their recommendations to the SBE.	Review Panel curates a report of their recommendations to the SBE.	60 days Sept-Nov
5	Recommendations are submitted to be on the SBE agenda.	NDE	Review the consolidated list of recommendations for all content areas under review.	Instructional materials items are placed on the January SBE agenda.	30 days December
6	Adopt instructional materials	SBE	SBE determines whether all listed materials shall be adopted officially.	List of approved materials that districts may adopt immediately.	No later than March 31 (Date TBD by SBE)
7	Publish the State Board approved list of instructional materials	NDE	Update and maintain a spreadsheet for each content area that includes review findings and other key information for each approved item.	Links to the list of adopted instructional materials are added to the instructional materials page of the NDE website	30 days No later than April 30 (date contingent on corresponding Board meeting)

Source: Website Office of Teaching and Learning, January 2025.

It is worth emphasizing that the current process is now paused until the 2026-27 school year with LEAs not able to update their textbooks/materials. If an LEA has a textbook that is approaching the end of the contract cycle, LEAs are currently instructed to use materials on the adopted lists approved by the NDE and SBE. This unfortunately has the potential to have outdated materials used in classrooms for instructional purposes.

Other concerns brought up during interviews with the LEAs and staff included:

- LEAs cannot go faster on their approval process than the state thus delaying the process;
- Difficulty in receiving information on the textbook adoption cycles;
- Little flexibility in the current process for LEAs to meet their own needs; LEAs should be able to give OTL evidence-based research on why certain materials are needed and not have to wait for NDE; and
- Limited ability to have all state-level review committees fully staffed due to lack of applicants.

The LEA survey included open-ended comments that reflect the dissatisfaction with the textbook adoption process.

RECOMMENDATION 3-3:

Return the Material Adoption Process to the prior format with LEAs conducting the textbook/material reviews and sending their district Board of Trustees' approved recommendations to the NDE and State Board of Education for final approval.

In a review of how other states adopt textbooks/materials, there is a need for thoughtful and clear policies and procedures due to the “high stakes” in student learning as well as the extensive fiscal resources needed to adopt textbooks/materials. The policies and procedures vary across all 50 states; however, there are two basic categories: (1) SEAs that allow LEAs and schools to independently choose the instructional textbooks/materials they will use and (2) SEAs that have a “state-level” selection process.²³

Further research has been found:

In the 19 states with state policies, state-appointed boards are responsible for reviewing textbooks and creating lists of “adopted” or “approved” textbooks for districts to consider. In the remaining states, districts are largely left to shift for themselves based on their own criteria.

Policy across the 19 state adoption states varies greatly. For example, in Tennessee, Rhode Island, and Nevada, districts must adopt state-approved textbooks or seek a waiver to use a nonapproved textbook. But in Texas and New Mexico, adoption lists are recommendations, not mandates.

Even when districts adopt a textbook from a state-approved list, our research indicates that only a third of teachers use that textbook regularly with little or no modification. More commonly, teachers heavily modify the textbooks they are provided, assembling lesson plans that draw from multiple textbooks or relying on lesson plans

²³ Zinth, K. (2005). *State notes: Textbook adoption*. Denver, CO: Education Commission of the States.

*that they have created entirely by themselves. For states looking to increase the amount of actual classroom instruction driven by high-quality materials, influencing local adoption is only the first step.*²⁴

In addition, the policy brief, “Textbook and Instructional Material Adoption Policy and Procedures” ([ED491463.pdf](#))²⁵ is provided as a resource and primer for adoption policies in several states. The Education Commission on the States published the following chart to highlight differences across states on the process for textbook/material adoption: [State-Information-Request Textbook-Adoption-Policies.pdf](#).

Upon reviewing the Nevada State Board of Education (SBE) Instructional Materials Ad Hoc Committee’s findings and recommendations as well as this report, OTL should prepare a comprehensive plan for Textbook/Material Adoption. The final plan should be developed with key stakeholders such as LEA superintendents, curriculum directors, principals, and teachers. An emphasis should be placed upon a process that is timely, transparent, and collaborative. When creating timelines for adoption cycles of materials, emphasis should be placed on when fiscal years begin and end, the districts’ calendars, and professional development.

Once the plan is finalized it should be presented to NDE leadership, the SBE, as well as district superintendents. There should be a communication plan developed in conjunction with the overall Textbook/Material Adoption Plan to be sure all parties are aware of the process going forward.

FISCAL IMPACT

The stipends allocated for the current review committees at the state level were paid through ESSER funds. With the expiration of those funds, the state would need to secure alternative sources of funding should the review committees continue to be in place.

OFFICE OF EARLY LEARNING AND DEVELOPMENT

Overview

The Office of Early Learning and Development (OELD) works to increase access and improve the quality of early childhood programs by administering state and federal funding for programs such as Nevada Ready! State Pre-K and Head Start State Collaboration Office (HSSCO). The OELD oversees the functions of the following programs:

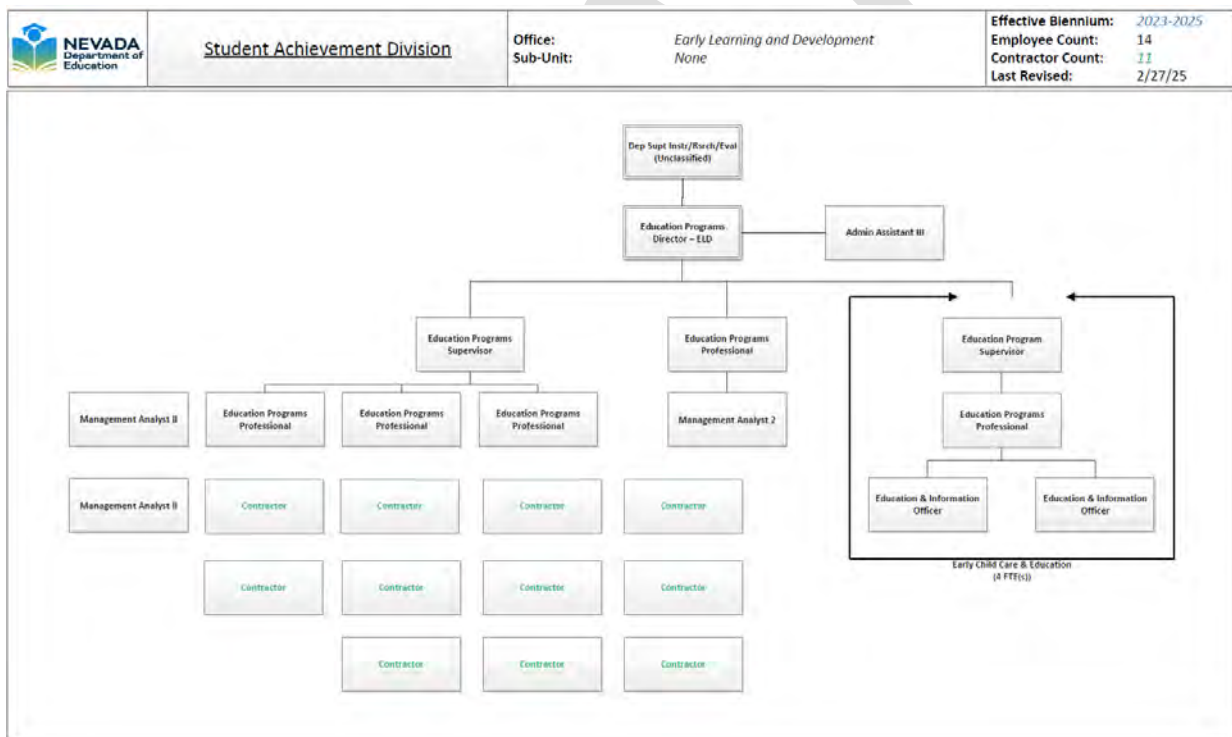
- Nevada Ready! State Pre-K Program
- Head Start State Collaboration Office (HSSCO) (State Program)
- Silver State Quality Rating and Improvement Rating (QRIS) Program (State Program)
- Nevada Early Educators Workforce Registry (State Program)
- Nevada Early Childhood Advisory Council (ECAC) (Legislative Council)

²⁴ “What Role Do States Play In Selecting K-12 Textbooks”, Journal of National Association of State Boards of Education, January 2024, vol. 24, No. 1,

²⁵ Dumas, P. (2006, February). Textbook and Instructional Materials Adoption Policy and Procedures. <https://files.eric.ed.gov/fulltext/ED491463.pdf>

Exhibit 3-7 demonstrates the current structure of the OELD. As shown, the OELD has a Director who has been with the NDE for 10 years. The OELD Director reports directly to the Deputy Superintendent of Academic Achievement. Reporting to the OELD Director there are two Education Program Supervisors (EPS) with each overseeing specific programs or areas. The OELD has one full-time position for an Administrative Assistant; however, during the time of interviews the employee was on leave. During this time, there was a contracted half-time Administrative Assistant position. The office has a total of 14 FTE positions including the Administrative Assistant and leadership positions. In addition to the 14 FTEs, there are nine outside contractors hired to conduct OELD work. During interviews with both full-time NDE staff and the contractors it was noted the number of contractors was due to the awarding of a grant and that hiring contractors was more efficient due to the long lag time with hiring through the Human Resources state office.

EXHIBIT 3-7
CURRENT ORGANIZATIONAL CHART OF THE OELD



Source: Nevada Department of Education, Office of Early Learning and Development, February 2025.

Key Functions of the Office of Early Learning and Development:

According to the NDE website, the key function of the Office of Early Learning and Development is to *ensure that all children from birth through third grade have access to quality early care and education across a variety of program settings*. The office coordinates state-level reform efforts, which are part of a national initiative, to transform how young children learn.²⁶

The OELD coordinates with several other federal and state agencies, community groups, public and private childcare providers, and school districts to provide high quality early education to Nevada's

²⁶ NDE website, September 2024.

youngest learners. In a recent study conducted by the Guinn Center titled From Crowded to Coordinated: Examining the Governance of Nevada’s Early Childhood System (October 2024), a main policy recommendation was to streamline and strengthen the services of early childhood education under one governance structure. This will be discussed in greater detail in the Findings/Recommendations Section of this report. Under the current structure, each area under the OELD has federal and state requirements:

- Nevada Ready! State Pre-K Program: Nevada Ready! State Pre-K (NR!PK) is a state funded pre-kindergarten program designed to support 4-year-old children (must turn 4 on or before August 1st) by providing high-quality learning environments and experiences. These full day learning options are offered in both school district classrooms and community-based childcare centers throughout the state of Nevada. Families must meet the income eligibility which consists of a household income of 200% below the federal poverty level (FPL). NR!PK implements high-quality practices through a variety of program requirements including, but not limited to highly qualified teachers, developmentally appropriate curriculum and assessments and inclusive learning environments. All NR!PK classrooms participate in Quality Rating and Improvement System (QRIS) which is an evaluation tool intended to develop practices that best support children.²⁷
- Head Start State Collaboration Office: Is responsible for developing and facilitating statewide partnerships, enhance relationships, builds systems and promotes comprehensive quality services to meet the needs of young children and their families. The office exists through grants from the U.S. Department of Health and Human Services, Administration for Children and Families, and the Office of Head Start. The Nevada Head Start State Collaboration Director currently works out of the OELD. According to OELD staff, they are currently leading efforts to build a comprehensive system of early childhood services across the state, so all children can enter school ready to learn.
- Silver State Quality Rating and Improvement Rating (QRIS) Program (State Program): *Through respectful and strong state partnerships, Nevada's Quality Rating and Improvement System (QRIS) works to equitably improve and sustain the early childhood system through quality coaching, accurate assessing, financial support, community engagement and advocacy for the early childhood community to benefit families of young children in Nevada.*²⁸
- Nevada Early Educators Workforce Registry (State Program): *Serving Early Childhood educators throughout Nevada, The Nevada Registry is a workforce data system that captures important information about the Early Care and Education (ECE) workforce in Nevada through career ladder placement, workforce support, training approval and data collection.*²⁹
- Nevada Early Childhood Advisory Council (ECAC) (Legislative Council): *In 2009, the Council was established by an executive order signed by Governor Gibbons, which was continued by Governor Sandoval in 2011. During the 2013 Nevada Legislature Governor Sandoval signed [Assembly Bill 79](#) establishing the Council in statute. Membership includes a diverse group of business, community, education, government, non-profit, parent, and provider representatives that are*

²⁷ NDE, CANVAS, On Boarding Class, 2024.

²⁸ Id.

²⁹ Nevada Registry Website, November 13, 2024.

*appointed by the Governor and which follow the Head Start Act requirements for State Advisory Councils.*³⁰

Budget Information for Office of Early Learning and Development

As illustrated in **Exhibit 3-8**, the budget for OELD is under one Budget Code 2709. Under Budget Code 2709 are the Object Codes that describe the budgeted use of the funds and the program. The larger amounts of funding are for specific grant funded programs such as Childhood Development Funds (CCDF), Pre-School Development Grant (PDG) and NV Ready. The CCDF and PDG funds are federal and NV Ready are state funds. The budgets below are for the biennium of FYs 24 and 25.

**EXHIBIT 3-8
OELD BUDGET**

2709	Category	Tot FY 2024	Tot FY 2025
1	PERSONNEL	\$1,383,264	\$1,482,014
3	IN-STATE TRAVEL	\$0	\$0
4	OPERATING	\$1,838	\$1,894
5	EQUIPMENT	\$4,608	\$0
12	INDIRECT COST	\$116,610	\$121,120
17	HEAD START 93600	\$34,379	\$18,463
21	CCDF QUALITY AID 93575	\$6,257,011	\$7,254,572
22	CCDF QUALITY ADMIN 93575	\$4,525,813	\$2,204,839
26	INFORMATION SERVICES	\$11,720	\$9,409
32	PDG INFRASTRUCTURE 84419	\$980	\$980
33	NV READY PRE K ADMIN	\$33,857	\$34,075
34	NV READY PRE K ATS	\$25,448,322	\$27,971,322
58	COMPUTER EQUIPMENT SB500	\$2,404	\$2,404
63	PDG B5	\$0	\$0
64	PDG B5 RENEWAL	\$9,953,968	\$17,759,686
82	DEPARTMENT COST ALLOCATION	\$3,784	\$3,784
87	PURCHASING ASSESSMENT	\$1,995	\$1,995
88	STATEWIDE COST ALLOCATION PLAN	\$5,123	\$5,669
93	RESERVE FOR REVERSION TO GENERAL FUND	\$71,531	\$0
	TOTAL	\$47,857,207	\$56,872,226

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

Plan for Work of the Office of Early Learning and Development

The OELD focuses its main efforts around providing districts, public and private childcare environments, and community agencies with support and guidance to carry out the objective of providing high quality early childhood education programming throughout Nevada.

A few examples include:

- **Nevada Ready! State Pre-K Program** conducts an annual survey of parents regarding the Nevada Ready! State Pre-K Programs. The survey is mandated through the Legislature for participating subgrantees. The survey is multifaceted covering many areas. The results are then

³⁰ ECAC website, November 13, 2024.

placed on a dashboard. The dashboard currently has three years of data across 14 subgrantees and over 90 schools/centers. One can access the dashboard here: [Nevada Ready! State Pre-K - Family Engagement | Tableau Public](#)

- The stated goals of the survey are listed below:
 - Evaluate family engagement in Nevada Ready! Stat Pre-K Programs across specific domains.
 - Identify areas to be celebrated.
 - Identify areas of improvement.
 - Assist subgrantees in developing higher impact Family Engagement Plans.
- The **Early Childhood Innovative Literacy Program (ECILP)**, or Assembly Bill 400 (AB400), was approved in the 2023 Session of the Nevada Legislature. A total of \$140 million was awarded to be spread across two fiscal years. The funds are intended to support early childhood literacy and readiness programs for children less than six years of age.³¹
- The **Pre-school Development Grant Birth Through Five (PDG B-5)** focuses on strengthening Nevada's integrated Early Childhood Education system to prepare low-income and disadvantaged children to enter kindergarten, and have a seamless and high-quality early childhood experience from birth through 3rd grade, by investing in the early childhood workforce and expanding access to high-quality early care and education programs and supports provided through a comprehensive mixed delivery system.³²
- The **Silver State Quality Rating and Improvement Rating (QRIS) Program** brings numerous advantages for early childhood providers. QRIS collaborates closely with community partners to enrich the support available to providers. By becoming part of QRIS, providers unlock a range of benefits, including access to scholarships, professional development opportunities, increased reimbursement rates, grants for classroom materials, and bonuses for achieving higher star levels. Moreover, QRIS provides invaluable guidance and coaching, assisting providers in reaching elevated quality standards. These benefits not only enhance the skills and qualifications of the workforce but also foster overall improvements in childcare environments, resulting in better outcomes for the children and families they serve.³³
- The **Nevada Early Childhood Advisory Council (ECAC)** conducts periodic statewide assessments of needs regarding early childhood education programs and identifies opportunities for and barriers to coordination and collaboration among early childhood education programs. ECAC also develops recommendations related to increasing participation in early childhood education programs, establishing or improving those programs, establishing statewide standards for those programs, supporting increased family engagement in those programs, and developing a statewide professional development system for educators engaged in supporting those programs. ECAC assesses the capacity and effectiveness of institutions of higher education in Nevada in developing teachers for early childhood education and establish guidelines for

³¹ NDE, OELD, ECILP website, November 14, 2024, [Early Childhood Innovative Literacy Program \(ECILP\)](#).

³² NDE, OELD, PDG B-5 website, November 14, 2024, [Home](#).

³³ NDE, OELD, QRIS website, November 14, 2024, [Benefits of participation in QRIS for providers](#).

evaluating the school readiness of children. The Council develops and submits an annual report on their activities and recommendations to the Governor and the Legislature.³⁴

FINDING

Through interviews with non-profits and community agencies, the staff of OELD received positive feedback for their commitment to early childhood education efforts. There was positive feedback for communication efforts including quarterly meetings, weekly email, and phone calls. The belief of OELD staff supporting efforts for early childhood education was also present in open comments on the Staff Survey such as this one, “The Office of Early Learning and Development works well as a unit, with a willingness to lift and support each other. We are focused on reaching meaningful outcomes and are persistent in our approach.”

While there were concerns expressed regarding funding and timeliness of receiving funding, these concerns were not attributed to the OELD staff.

The Early Childhood Advisory Council (ECAC) Chair provided positive feedback to NDE staff in working with the Council and receiving needed information. In interviews with the Guinn Center, there was also positive feedback on the efforts of the OELD staff to provide needed data to complete their 2024 study on early childhood systems across Nevada.

COMMENDATION 3-D:

The OELD works closely with outside agencies who state communication is frequent.

FINDING

In staff and external interviews, there was a theme of the OELD having commitment towards universal Pre-K in Nevada. In external interviews, it was noted that because of the professionalism and dedication of staff such as the OELD Director, the EPP, and the EPS, early childhood education is at the forefront of many policy discussions in the state. A staff member stated, “[The Director] has been able to create powerful relationships throughout the state. She has high respect and is a strength for the NDE.”

In addition, according to OELD staff, the award of the ECILP grant will provide for an increase in the number of seats available for 3- and 4-year-olds in PreK programs. Also, according to staff there are a number of opportunities where OELD staff are “at the table” in advocating for universal Pre-K such as through the ECAC and daily interactions with decision makers.

COMMENDATION 3-E:

OELD is seen as a key voice in the move for universal Pre-K as well as early childhood education overall in the state including elevating the need for systems alignment.

FINDING

The NDE and OELD were awarded a \$30 million Federal Preschool Development Grant Birth through 5 (PDG B-5) Renewal Grant. The funding will be over a three-year period. The grant will help fund activities in family engagement, workforce development, best practices and research in early

³⁴ NDE, OELD website, November 14, 2024, nvecac.com.

childhood care and systems, high quality educational environments for young learners, and data informed decision making.

The Early Childhood Innovative Literacy Program (ECILP) was created with the passage of Assembly Bill 400 (AB400) during the 82nd Legislative Session. AB400 legislated authority to the NDE to manage the \$140 million, two-year competitive grant opportunity centered on early learning and literacy. ECILP is broken down into two opportunities:

Opportunity 1 expands access to Nevada Ready! State Pre-kindergarten (NR!PK) program. Opportunity 2 funds innovative new programs or expands existing early literacy programs that support children less than the age of six, their families, and early childhood professionals.³⁵

The ECAC chair mentioned the ECILP grant during an interview and believed this funding to be a positive commitment to early childhood education and a show of support for funding such programs.

COMMENDATION 3-F:

OELD was successful in being awarded the federal Preschool Development Grant (PDG B-5) for calendar years 2023-2025 and receiving \$140 million over two years from the Nevada Legislature and Governor to support the Early Childhood Innovative Literacy Program (ECILP).

Findings Related to Office of Early Learning and Development

Note: Due to the scale of the Finding/Recommendation below, Public Works LLC felt it important to place emphasis on this one Finding/Recommendation for OELD. However, it is advised that the leadership and staff of OELD also review the Findings and Recommendations of the OSSS and OTL within this report regarding Contractors and their future use within the OELD.

FINDING

Early Childhood System (ECS) of Supports are fractured throughout the state with several entities working on different aspects of early childhood support which has led to inefficiencies and duplication of efforts.

According to the Guinn Center Study (2024), there are currently 18 programs focused on early childhood and another 45 programs serving both early childhood and other populations. This fragmentation has led to difficulties for stakeholders trying to navigate the system, most notably families. Contributing to this fragmentation of the early childhood systems is a matrix of 40 different state budget accounts used for early childhood programs throughout Nevada (Guinn Center Study, 2024). Importantly, the responsibility of this issue does not lie solely with OELD nor NDE; however, both the Office and Department are key stakeholders in the effort to implement an organizational structure that will streamline and prioritize early childhood education and a comprehensive system of support. Another critical stakeholder is the Early Childhood Advisory Council (ECAC) who is charged with strengthening state-level coordination and collaboration among the various stakeholders of early childhood programs. Both The Guinn Center and ECAC have authored policy reports and strategic plan goals to recommend a cohesive early childhood system in Nevada. See:

³⁵ NDE, OELD website, January 2025.

- ECAC 2022-2024 Strategic Plan Goal 1 [NECAC2022_2024StrategicPlanFINAL.pdf](#) and
- The Guinn Center Key Policy Consideration #1 [6717f516c47cdc6fdeb9ca04_ECS_Report-v4-for-web.pdf](#).

At a macro-level and to understand how the current early childhood systems developed, it is important to know critical programs, laws, and initiatives that were created and implemented to serve the youngest populations. Some examples follow:

- The Sheppard-Towner Act of 1921: [Sheppard-Towner Act | United States \[1921\] | Britannica](#)
- The federal Head Start program created in 1965: [Head Start and Early Head Start | Childcare.gov](#)
- The Women, Infants and Children (WIC) program in 1972: [Women, Infants & Children \(WIC\) - Home](#)
- The Temporary Assistance for Needy Families (TANF) program in 1996: [Welfare benefits or Temporary Assistance for Needy Families \(TANF\) | USAGov](#)³⁶

There were good intentions in the creation of such programs and laws. The result unfortunately, “contributed to a lack of a coordinated and cohesive strategy, thereby impeding the creation of a unified framework capable of holistically addressing the needs of young children.”³⁷ Although there has been an increase in funding for early childhood education programs and supports in Nevada, the investments are spread across public and private agencies and organizations.

OELD has few documented fiscal policies or operational procedures. In staff and external interviews, the theme of a “system of parts” in lieu of a unified system was a common thread. Examples provided in interviews included funding streams having different requirements for participation in early childhood programs, the OELD/NDE are not consulted regarding programs that impact early childhood education, and there is the impression that decisions are being made by agencies/individuals without the background knowledge of early childhood systems of care. Other agencies such as the Department of Health and Human Services (DHHS) and Department of Welfare Supportive Services (DWSS) have state and federal mandates regarding the obligation of early childhood care and support. This has led to a siloed effect of implementation of policies, several funding agencies, and varied programming. A lack of alignment can create missed opportunities for young learners, their families, and the workforce supporting them.³⁸

RECOMMENDATION 3-4:

Coordinate and improve all early childhood efforts under one centralized Office within the state of Nevada.

Note: Public Works LLC has provided the NDE with an organizational structure recommendation that includes the OELD being placed under the Division Future Ready Students. This should be considered as another strategy to support the above recommendation. See Section 1 for additional details and rationale for this change.

³⁶ Guinn Center Study, 2024.

³⁷ Guinn Center Study, 2024, page 7.

³⁸ Early Childhood Systems Building Resource Guide: Governance, 2024.

As key stakeholders in the arena of early childhood systems, the OELD/NDE as well as the ECAC have the expertise to help guide the discussions and create documented policies and procedures needed to improve the systems for early childhood support.

An excerpt from the *Early Childhood Systems Building Resource Guide: Governance*, 2024, succinctly supports the need for a more aligned early childhood system:

Shifting a governance strategy from a focus on programs to a focus on the whole system can significantly affect the coherence of early childhood systems for the benefit of children, families, the early childhood workforce, and communities. Because of this context, there is a nationwide movement across states to shift their approach from program governance to systems governance as a key strategy for systems building. States are recognizing that governance through a program focus rather than a systems focus may not be efficient, effective, or accountable. Program governance refers to the many early childhood programs (for example, child care; Head Start; Individuals with Disabilities Education Act, Parts B and C; home visiting; and prekindergarten) that are governed and operated independently and focus mostly on their program policies, populations, processes, service delivery, monitoring, and evaluations.

Focusing on governance from a systems perspective is part of current work across the country, with efforts to improve the clarity of authority for early childhood systems, lines of accountability at multiple levels (state, regional, and local), and operational functions so the delivery of supports and services is more coordinated, accessible, coherent, and high quality. But shifting governance is not a quick fix. The process requires taking a long view, thinking about and designing for your current reality as well as what might happen in the future. Governance change is a strategy, not a destination: it is in service of a larger goal.³⁹

Further justification is provided by the National Governors Association (NGA), which has put forth recommendations and best practices for state leaders in assembling a comprehensive early childhood system. Nevada has made progress over the last two decades as demonstrated with the associated links next to the recommendations from the NGA:

- Coordinate early childhood governance through a state early childhood advisory council that the governor designates, represents the full range of early childhood programs, and implements a strategic plan for comprehensive services statewide: nvecac.com.
- Build an integrated professional development system that reflects aligned and research-based professional development standards, supports recruitment and retention through career pathways, and uses a professional development registry: [The Nevada Registry | The Path to Brighter Futures](#).
- Implement a quality rating and improvement system that measures various aspects of program quality, applies standard metrics to all early care and education programs, and incentivizes program improvement: [QRIS Home](#).

³⁹ Early Childhood Systems Building Resource Guide: Governance, page 3, 2024.

- Develop a longitudinal and coordinated early childhood data system that tracks results, protects child and family privacy, and drives improvement by continually collecting, analyzing, and reporting information: [NPWR](#).
- Align comprehensive early learning guidelines and standards for children from birth to age 5 with K-3 content standards to bridge early experiences with the early elementary grades: [Pre-Kindergarten Standards](#).
- Integrate federal, state, and private funding sources to support and sustain the core components of a comprehensive, high-quality early childhood system: [Early Childhood Funding in Nevada: Five Key Findings from Nevada’s Early Childhood Fiscal Map - First 5 Nevada](#).

The Guinn Center Study (2024) also highlights several states that have demonstrated best practices in early childhood systems in the following areas:⁴⁰

- General Governance-**Colorado**
- General Governance and Finance-**Colorado and Vermont**
- Governance and Community Engagement-**Oregon**
- Governance and Data Management-**Utah and Georgia**
- Governance and the Workforce-**Illinois and Kentucky**

Tennessee is another state to provide as an example for exploring better systems for early childhood governance. Through the Federal Preschool Development Birth through 5 Grant (PDG B-5), the Tennessee Department of Education (TDOE) aims to gain a comprehensive understanding of the early childhood system within the state. The TDOE has explored the issue and developed a Landscape Analysis of the current state of early childhood support within the state: [3-28-4 TDOE Early Learning Needs and Opportunities Assessment.pdf](#).

In conclusion, although the undertaking of this recommendation will be a long-term strategy the benefits will include a more efficient, effective, and cohesive approach to early childhood support throughout the state. Having the NDE, OELD, and ECAC leadership and staff “at the table” will be imperative for a successful implementation.

As one example of a guide for implementation, it is recommended for OELD to review the [Systems Building Resource Guide | Child Care Technical Assistance Network](#) which provides an in-depth road map for the steps to take in order to implement the above recommendation. The document includes 12 chapters dedicated to exploring best practices in early childhood systems governance:

- [Understanding Systems Building | Child Care Technical Assistance Network](#)
- [Capacity Building Self-Assessment Tool | Child Care Technical Assistance Network](#)
- [Equity | Child Care Technical Assistance Network](#)
- [Financing Strategically | Child Care Technical Assistance Network](#)
- [Governance | Child Care Technical Assistance Network](#)
- [Leadership | Child Care Technical Assistance Network](#)

⁴⁰ https://cdn.prod.website-files.com/65d562aec1adaa8cb59f2a23/6717f516c47cdc6fdeb9ca04_ECS_Report-v4-for-web.pdf

- [Partner Communications | Child Care Technical Assistance Network](#)
- [Program Design and Implementation | Child Care Technical Assistance Network](#)
- [Program Evaluation and Continuous Quality Improvement | Child Care Technical Assistance Network](#)
- [Project Management | Child Care Technical Assistance Network](#)
- [Strategic Plans | Child Care Technical Assistance Network](#)
- [Strategic Relationships | Child Care Technical Assistance Network](#)
- [Sustaining Gains | Child Care Technical Assistance Network](#)

FISCAL IMPACT

The overall Fiscal Impact for this particular recommendation will largely depend upon the entity that is charged with the implementation and the scope and scale of the work to develop a fully functional early childhood system. The Guinn Center Study provides for a recommendation that includes “a neutral entity within the Executive Branch.” In conjunction with this recommendation, it is Public Works LLC’s recommendation that the NDE and OELD be key parties involved at the outset. The new office/entity should be provided adequate staff and full authorization to complete the undertaking of the development of a system of early childhood support. The fiscal impact cannot be determined at this time.

Two additional helpful sources of information include:

- [Nevada Early Childhood Care and Education Fiscal Feasibility Study](#)
- [ECE Funding Map - Google Sheets](#)

OFFICE OF SCHOOL AND STUDENT SUPPORT (OSSS)

Overview

The Office of School and Student Support (OSSS) administers and supports programs to enrich and expand high-quality learning opportunities for all students and who leads specific areas: School Improvement, Special Programs and Federal Programs. The OSSS oversees the functions of the following programs:⁴¹

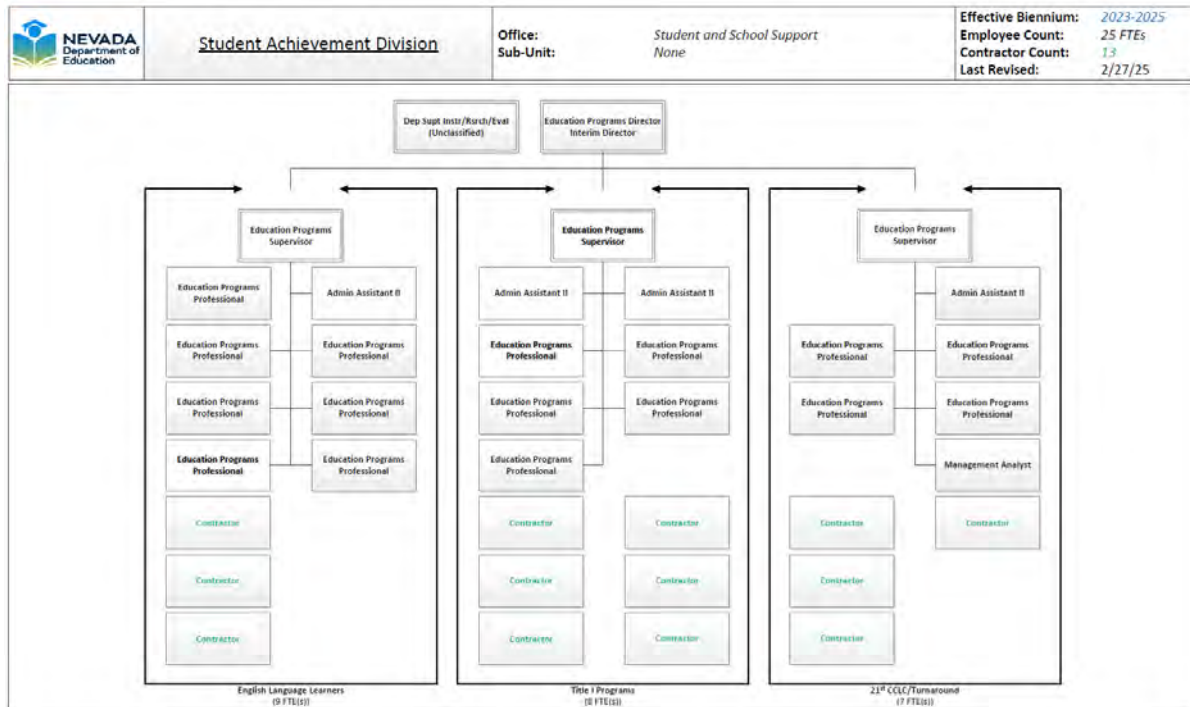
- Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (Federal Program)
- Title I, Part A, Section 1003 (a): School Improvement Grant (Federal/State Program)
- Title I, Part C: Education of Migratory Children (Federal Program)
- Title III, Part A: Language Instruction for English Learners and Immigrant Students (Federal Program)
- Title IV, Part A: Student Support and Academic Enrichment Grants (Federal Program)
- Title IV, Part B: 21st Century Community Learning Centers (Federal Program)
- Title IX, Part A-McKinney-Vento: Education for the Homeless and Other Laws (Federal Program)
- Foster Care (State Program)

⁴¹ NDE, CANVAS, On Boarding Class, 2024.

- GEAR UP (Federal Program)
- Private Schools/Educational Choice Scholarships/Equitable Service Ombudsman

Exhibit 3-9 shows the current organization chart of the OSSS. As shown, the office is overseen by a director. In September 2024, a new director of OSSS was hired. The OSSS Director reports directly to the Deputy Superintendent of Academic Achievement. Reporting to the OSSS Director are three Education Program Supervisors (EPS) who oversee specific areas such as School Improvement, GEAR UP, and English Language Development. At the time of the staff interviews, there was one EPS currently in place and the hiring of the other two positions was in process. The OSSS has four Administrative Assistant positions including three Administrative Assistant II and one Administrative Assistant IV. There are a total of 30 FTE positions including the Administrative Assistant's and leadership positions. In addition to the 30 FTEs, there are 17 outside contractors shown on the organizational chart; however, at least five of those positions are vacant. The contractors vary in their time working for the OSSS from several months to three years. The main reason provided for the number of contractors being hired is that it is "easier" to hire contractors than full-time staff due to current HR processes and the rate of pay for NDE employees versus contractors. In addition, according to NDE staff, some positions are specifically budgeted for a contractor rather than a full-time staff member.

EXHIBIT 3-9 CURRENT ORGANIZATIONAL STRUCTURE OF THE OSSS



Source: Nevada Department of Education, OSSS Office, February 2025.

Key Functions of the Office of Student and School Support

According to the NDE/OSSS webpage, the Office of Student and School Supports offers an array of programs and works in partnership with schools and districts to support and improve teaching and learning to help students achieve in a safe and academically challenging environment.⁴²

These efforts include:

- Offering programs and grants to assist districts and schools with helping students achieve their fullest potential;
- Providing guidance to schools to understand requirements of specific programs;
- Assisting schools and districts in creating safe and healthy school climates;
- Supporting districts and schools with guidance on English Language Learners; and
- Collaborating with districts and schools about their programs ensuring that instructional practices are evidence-based, data driven, and effective.

The key functions of OSSS include the administering of guidance, technical assistance, and federal and state compliance requirements to the 17 school districts and the State Public Charter School Authority (SPCSA) across Nevada. Each program overseen by OSSS has a purpose and federal and state requirements:

- Title IV, Part B: 21st Century Community Learning Centers: *The purpose of 21st Century Community Learning Center Program is to establish or expand community-learning centers that provide out of school academic enrichment opportunities along with activities designed to complement the students' regular academic program. 21st Century Community learning centers must also offer families of these students' literacy and related educational development. Centers provide a range of high-quality services to support student learning and development, including tutoring and mentoring, homework help, academic enrichment (such as hands-on science or technology programs), and community service opportunities, as well as music, arts, sports and cultural activities. At the same time, centers help working parents by providing a safe environment for students during non-school hours or periods when school is not in session.*⁴³
- Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies: *Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), in broad terms, is to even the playing field for our low-achieving children and youth, high poverty children and youth, Limited English Proficient (LEP) children and youth, children and youth experiencing migrant situations, students with disabilities (SWD), Indian children and youth, and neglected or delinquent children and youth. Title I funds are allocated through four main grants and are based on mathematical formulas involving the number of students eligible for Title I support.*⁴⁴
- Title III, Part A: Language Instruction for English Learners and Immigrant Students: *The Nevada Department of Education's Title III and English Learner (EL)/Immigrant program is designed to enhance school districts and other local education agencies' capacity to provide high quality*

⁴² NDE/OSSS website, November 11, 2024.

⁴³ NDE website, 2024.

⁴⁴ NDE, CANVAS, On Boarding Class, 2024.

education to EL and immigrant students who represent at least 14% of Nevada's school population. Per the Elementary and Secondary Education ACT (ESEA) as amended by the Every Student Succeeds Act (ESSA) (2015), students are initially identified for language screening in a Nevada school if a language other than English is identified in one of the three following areas: the primary language of the student, the language of the home, or the language spoken with peers. Upon initial English proficiency screening, students whose results are less than a 4.5 on the WIDA Screener qualify for English learner services and assessment.⁴⁵

- Title IV, Part A: Student Support and Academic Enrichment Grants: *Authorized under subpart 1 of Title IV, Part A of the ESEA, the Student Support and Academic Enrichment (SSAE) program is intended to help meet the goals of the grant by increasing the capacity of State educational agencies (SEAs), local educational agencies (LEAs), schools, and local communities to:*
 1. *provide all students with access to a well-rounded education,*
 2. *improve the safety and create healthy learning environments for all students, and*
 3. *improve the use of technology to improve the academic achievement and digital literacy of all students.*

*This federal grant provides Local Educational Agencies (LEAs) with funds towards building capacity to ensure that all students have access to high-quality educational experiences.*⁴⁶
- Title I, Part C: Education of Migratory Children: *The Migrant Education Program provides technical assistance and financial support to improve the educational opportunities and academic success of migrant children, youth, agricultural workers, fishers, and their families. The general purpose of the Migrant Education Program (MEP) is to ensure that migrant children benefit from the same free public education provided to other children. The Migrant Education funds are federal funds to support high quality education programs for migratory children ages 3 through 21. The funds help ensure that migratory children who move from other states or within the state are not penalized in any manner by disparities among states in curriculum, graduation requirements, or state academic content and student academic achievement standards. Funds also ensure that migratory children receive full and appropriate opportunities to meet the same challenging state academic content and student academic achievement standards that all children are expected to meet.*⁴⁷
- Title IX, Part A-McKinney-Vento: Education for the Homeless and Other Laws: *The McKinney-Vento Law was enacted in 1987 to remove common barriers children and youth experiencing homelessness often encountered from being unhoused. In order to ensure students, have the best possible outcomes, it is critical for them to have access to all of the services and supports that are available in school. Homelessness can be broken down into four categories: Chronic, Episodic, Transitional, and Hidden.*⁴⁸
- Foster Care: *With new laws and regulations helping to spotlight both the needs and rights of students in foster care, it is the Department of Education's mission to offer up to date information and resources to stakeholders in need of such information.*⁴⁹

⁴⁵ NDE website, 2024.

⁴⁶ Id.

⁴⁷ NDE, CANVAS, On Boarding Class, 2024.

⁴⁸ Id.

⁴⁹ Id.

- Title I, Part A, Section 1003 (a): School Improvement Grant: *The culture behind Nevada's improvement planning embraces high expectations for each student and is built upon the foundation of the following beliefs:*
 - *The work of schools is student learning;*
 - *All children can benefit from challenging and relevant curriculum;*
 - *Every teacher can be an expert when provided collaborative and sustained professional development focused on improving instruction;*
 - *Content should be aligned to standards, be challenging, and be relevant;*
 - *Key indicators of success are achievement/proficiency scores, graduation rates, dropout rates, percent of highly qualified teachers, and adequacy and equity of funding for all public schools;*
 - *Improvement must be continuous;*
 - *Parental support and involvement are critical to improved student performance and;*
 - *Effective use of data is critical to continuous improvement of teaching and learning.*⁵⁰
- GEAR Up: Nevada's State GEAR UP (Gaining Early Awareness and Readiness for Undergraduate Programs) is a federally funded, competitive grant that is designed to increase the number of low-income students who are prepared to enter and succeed in postsecondary education. Students are identified to participate in GEAR UP during their 6th grade year and take part in GEAR UP activities that continue through high school and into college. The state grant currently serves 5 schools and over 10,800 students throughout the state.⁵¹
- Private Schools: There are 132 private schools in the state of Nevada, 91 in Southern Nevada and 41 in Northern Nevada. All private schools must be licensed by the Nevada Department of Education. A majority of the private schools are exempt from the Private Elementary and Secondary Education Authorization Act. Exempt private schools are those connected to a church or ministry, another government agency, or a fraternal/benevolent entity. All private schools, exempt or not, must provide at least the curriculum required of public schools, 180 days of instruction, and the same number of minutes per day that is required of public schools. Private schools are not funded by the state, but parents may apply for an Educational Choice Scholarship if their child attends a private school that is registered to receive those scholarships. Some schools offer their own tuition assistance. Parents who enroll their children in private schools agree to pay tuition and fees the school requires.⁵²

Importantly, beyond the functions listed above, OSSS also had the responsibility, along with the Grants Management Unit (GMU) in the Student Investment Division (SID), to allocate and monitor the American Rescue Plan Elementary and Secondary Emergency Relief Fund (ARP ESSERS). This funding, more than \$1 billion for Nevada, supported educational needs during the pandemic as well as recovery from effects of the pandemic. The funding was available to all LEAs until September 30, 2024, and according to NDE staff, late liquidation of funds runs through 2026.

⁵⁰ NDE website, 2024.

⁵¹ Id.

⁵² NDE, CANVAS, On Boarding Class, 2024.

Budget information for Office of School and Student Support

As illustrated in **Exhibit 3-10**, the budgets for the OSSS include two Budget Codes: 2678 (GEAR-UP Grant) and 2712 (Office of School and Student Support). Under each of the Budget Codes are the Object Codes that describe the budgeted use of the funds and the program. For example, under Budget Code 2678, Object Code 36 shows the total amount of GEAR-UP funding allocated to schools. Similarly, under Budget Code 2712, Object Code 15 shows the amount of federal Title I funds allocated. The budgets below are for the biennium of FYs 2024 and 2025.

EXHIBIT 3-10
OSSS BUDGET INFORMATION FOR FY 2024 AND 2025

2678	Category	Tot FY 2024	Tot FY 2025
1	PERSONNEL	\$501,551	\$518,760
2	OUT-OF-STATE TRAVEL	\$10,040	\$10,040
3	IN-STATE TRAVEL	\$13,310	\$13,310
4	OPERATING	\$1,002,719	\$638,586
12	INDIRECT COSTS	\$74,840	\$79,988
26	INFORMATION SERVICES	\$4,586	\$11,794
36	GEAR UP AID TO SCHOOLS 84334S	\$5,743,068	\$2,213,939
82	DEPARTMENT COST ALLOCATION	\$1,455	\$1,455
87	PURCHASING ASSESSMENT	\$1,424	\$1,424
88	STATEWIDE COST ALLOCATION PLAN	\$9,563	\$10,704
	TOTAL	\$7,362,556	\$3,500,000

2712	Category	Tot FY 2024	Tot FY 2025
1	PERSONNEL	\$2,773,837	\$2,655,353
2	OUT-OF-STATE TRAVEL	\$6,834	\$6,834
3	IN-STATE TRAVEL	\$7,003	\$7,003
4	OPERATING EXPENSES	\$85,147	\$86,421
5	EQUIPMENT	\$4,608	\$0
8	MIGRANT EDUCATION 84011	\$108,753	\$87,235
9	EXTERNAL EVALUATIONS	\$0	\$0
10	NEGLECTED OR DELINQUENT - ADMIN 84.013	\$9,462	\$93,379
11	NEGLECT/DELINQUENT AID 84.013	\$1,900,849	\$943,850
12	INDIRECT COST	\$960,872	\$969,009
14	TITLE 1 BASIC ADMIN 84.010	\$1,252,058	\$9,301
15	TITLE 1 BASIC ATS 84.010	\$191,488,392	\$134,516,280
16	MIGRANT CONSORTIUM-ADMIN 84.144	\$180,847	\$77,375
17	COMMISSION ON MENTORING	\$28,690	\$28,690
19	SCHOOL IMPRVMNT GRANT-ADMIN 84.377	\$0	\$191,818
20	SCHOOL IMPRVMNT GRANT-ATS 84.377	\$87,613	\$1,756,589
22	FED HOMELESS CHILDREN ADMIN 84.196	\$324,629	\$48,662
23	FED HOMELESS CHILDREN ATS 84.196	\$1,339,395	\$851,587
24	SCHOOL PRIVATE GRANT	\$21,912	\$21,912
26	INFORMATION SERVICES	\$16,574	\$12,019
28	ENGLISH MASTERY COUNCIL	\$8,365	\$8,365
31	ENGLISH LANGUAGE ACQ - ADMIN 84.365	\$531,216	\$214,291
32	ENGLISH LANGUAGE ACQ - ATS 84.365	\$12,344,795	\$7,698,042

2712	Category	Tot FY 2024	Tot FY 2025
36	PROGRAM IMPRVMT-ADMIN 84.010	\$1,063,318	\$219,978
37	PROGRAM IMPRVMT-ATS 84.010	\$17,399,998	\$10,993,925
40	RURAL & LOW INCOME ATS 84.358	\$242,349	\$174,467
43	SAFER COMM ADMIN 84.424F	\$88,660	\$81,916
44	SAFER COMM SET ASIDE 84.424F	\$354,640	\$354,640
45	SAFER COMM ATS 84.424F	\$8,422,703	\$5,693,799
46	EXPANDING OPPORTUNITY 84.424D	\$1,116,437	\$625,544
47	EXPAND OPP - GOWINN	\$440,000	\$440,000
50	TITLE IV-A ADMIN 84.424	\$857,593	\$262,794
51	TITLE IV-A WELL-RND ATS 84.424	\$23,883,205	\$10,864,982
58	COMPUTER REPLACEMENT SB500	\$2,404	\$164
64	21ST CENTURY LRNG-TECH ASST 84.287	\$866,607	\$48,060
65	21ST CENTURY LRNG-ADMIN 84.287	\$48,648	\$128,766
66	21ST CENTURY LRNG CNTRS 84.287	\$14,798,722	\$10,804,803
67	INDIAN EDUCATION ATS 84.299	\$0	\$0
68	INDIAN EDUCATION ADMIN 84.299	\$0	\$0
70	COST ALLOCATION STAFFING SERVICES	\$28,503	\$33,056
72	SCHOOL IMPROVEMENT PROGRAM	\$500,000	\$500,000
82	DEPARTMENT COST ALLOCATION	\$6,695	\$6,695
87	PURCHASING ASSESSMENT	\$2,377	\$2,377
88	STATEWIDE COST ALLOCATION PLAN	\$58,096	\$66,614
	TOTAL	\$283,662,806	\$191,586,595

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

Plan for the Work of the Office of Student and School Support

In a review of requested data and documents including emails, PowerPoint presentations, memos, excel spreadsheets, interviews, focus groups, and the NDE website, each area within OSSS has a specific plan to carry out in the overall mission of providing support and guidance to LEAs and the end users of students and educators. The work of each area varies in complexity and breadth of support to the LEA. The overall emphasis is providing support and technical assistance to the LEAs through a variety of initiatives.

A few examples include:

- In the area of **School Improvement**, the annual school designations are assigned and monitored through the development of District Performance Plans (DPPs) and School Performance Plans (SPPs). Technical assistance is provided to LEAs in the writing and drafting of the DPPs and SPPs. The School Improvement team also works with schools assigned the additional federal designations of Comprehensive Support Improvement (CSI), Targeted Support and Improvement (TSI), Additional Targeted Support and Improvement (ATSI), and the newest designation More Rigorous Intervention (MRI).
- In the area of **Title I, Part A**, staff disseminate technical assistance through memos, emails, webinars, and in-person meetings to communicate federal guidelines, provide professional learning opportunities and budgetary support. The guidance includes such topics as supplement versus supplant spending, maintenance of effort, comparability, allowable costs, and the principle of necessary, reasonable, and allocable.

- In the area of **Title III, Part A**, staff offers professional learning opportunities to meet the diverse linguistic and cultural needs of Nevada’s English learners and the LEAs. Staff work to coordinate EL initiatives and EL policy development; providing programmatic leadership to share the knowledge base of issues related to EL programs; and supporting local institutions of higher education to develop creative professional development programs for teachers, principals, and other school-based educators.⁵³
- In the area of **McKinney Vento/Homeless and Foster Youth**, staff provide LEAs with updated federal and state regulations. Staff provide technical assistance as well as desktop monitoring related to grant requirements.

FINDING

OSSS has had significant turnover in leadership as well as EPP staff positions. In interviews, staff commented on the increased workload because of turnover and unfilled positions. One employee stated, “People were dying under the weight of workloads.” Statements such as this were frequent and have resulted in staff feeling overworked and having poor morale throughout the office.

In addition, there was clear disruption to the work environment with the past leadership and this was articulated in both internal and external interviews. Under the prior leadership, directives were not clear or changed frequently with little to no notice. There was also a loss of credibility among LEAs when prior leadership selected a vendor for the DPP and SPP templates without consulting school districts; it was also apparently presented to principals before it was shown to district-level administration.

In interviews, OSSS staff felt “a weight lifted” upon the hiring of a new Director. The new Director has been present, transparent, and has presented ideas for better communication, according to staff. Staff feel as though there is a “new direction” and “positive” direction being provided by the new leadership.

COMMENDATION 3-G:

The new Director of OSSS has been well received by staff who have been seeking increased direction and empathetic leadership.

FINDING

In LEA and OSSS staff interviews, there was agreement that the REV 0 Grant Application process needs to be improved and streamlined for maximum efficiency. According to OSSS staff, 96.93 percent of Title I, Part A funds were unavailable by July 2, 2024. Out of \$158,996,047.14 in Title I, Part A funds, \$154,117,388.32 remained unavailable. This result demonstrates a delay in schools receiving funding for the start of the academic school year.

According to OSSS staff, having the ability to have early application openings for LEAs solves almost all inefficiencies in the current REV 0 Grant process. At a very simplistic level, the basic process includes using the previous year’s allocation as a “stand in” budget for the districts to begin spending federal funds.

⁵³ NDE website, 2024.

COMMENDATION 3-H:

Staff within OSSS are spearheading a “paradigm shift” strategy to get federal fund application approvals in a more efficient manner to LEAs. The strategy entails using a place holder amount, in most cases the prior year’s allocation amount, in the budget.

FINDING

An OSSS staff member worked across offices with the GMU, EDLIFE, and with Title IV, Part A to make available the Alternative Fund Use Authority, a provision in ESSA available to rural school districts.

NDE did not have an application process in place for Title II, Part A and Title IV, Part A to accommodate this provision and the staff member worked to bring awareness of this provision to NDE as a whole. The staff member worked with respective Title programs to revise funding applications so that rural LEAs could elect to exercise this flexibility provision. It was implemented for FY2024 as a pilot and finalized in FY2025.

COMMENDATION 3-I:

OSSS staff are committed to collaborating with other offices to improve processes and procedures to enhance NDE’s efficiency.

FINDING

The OSSS utilizes contractors to perform job tasks that should be delegated to NDE staff within OSSS.

While the use of contractors is at times necessary because of expediency or specialized skills the contractor may possess for a particular project, the long-term hiring of contractors should be limited or eliminated. In interviews with both full-time NDE staff as well as contractors in the OSSS, the work being carried out by the current contractors does not require specialized skill sets. The work being conducted by contractors is within the regular scope of work of the OSSS and OSSS staff job descriptions.

Work currently assigned to contractors includes some of the following:⁵⁴

- Conducting professional learning for English Language Development
- Coordinating Federal Relief Funds
- Supporting Private Schools on compliance areas for funds disseminated
- Supporting CSI, TSI and ATSI schools
- Supporting the efforts of AB495
- Supporting the Nevada Commission on Mentoring (NCOM)
- Supporting GEAR UP efforts
- Conducting projects for Title I, Part A and Title I, Part D
- Assisting on Grant Writing Team
- Reviewing possible grant opportunities
- Conducting data analysis
- Implementing the School Improvement Resource Allocation Review (RAR) process
- Supporting rural LEAs on grants management
- Supporting Foster Youth projects

⁵⁴ OSSS Organizational Chart and staff interviews, 2024.

Staff have stated that due to the long lag-time in hiring processes for regular full-time staff, it is more expedient to hire contractors to get the work accomplished. This has led to the hiring of several contractors, some of whom have continued to work for two to three years with the same type of work as well as taking on new tasks. In interviews conducted, the number of contractors in OSSS ranged from 16 to 18; however, on the organizational chart provided, 17 were counted with at least five positions being vacant.

When reviewing the organizational chart of OSSS, it should be noted that at least three of the positions listed had a budget code recognized as COVID funding. This was also explained during interviews with NDE staff and contractors in which it was stated some of the contracting positions would have an end date with the expiration of COVID funding.

In conducting interviews, there seemed to be some unclear understanding of the work being completed by contractors, hours they work, benefits they receive, and days worked vs. holiday pay between NDE staff and contractors. In some instances, this has led to NDE staff having the understanding that contractors have more “flexible” schedules and receive higher pay for the work being performed. This understanding does not assist NDE in retaining staff.

It was also noted contractors who have been under contract with OSSS for particular assignments have taken on new responsibilities such as the Resource Allocation Review (RAR) which is an initiative, “that aims to assess how the NDE, districts, and schools ensure the fair distribution of funding and educational resources to address the needs of all students”.⁵⁵ This is problematic because a contractor is typically hired for a particular project; it should not be common practice to expand the work scope of a current contractor.

RECOMMENDATION 3-5:

With the understanding that all work should focus on the support of LEAs/schools as the priority while adhering to federal and state law, OSSS should reduce and eventually eliminate contracting positions that entail work which should be completed by internal NDE staff.

With the goal of reducing and eventually eliminating contracting positions entailing work that should be completed by internal NDE staff, the OSSS can strategically re-focus on the purpose of OSSS: *Supporting and improving teaching and learning to help students achieve in a safe and academically challenging environment*. Empowering current OSSS leadership and staff to review their workloads and “clearing the deck” of work not directly related to the mission and purpose of OSSS will lead to better alignment with the overall mission of the NDE. The OSSS Director should conduct a regular analysis of each contractor’s current work, determine how to distribute it among existing staff, and work on a plan to eventually eliminate contract staff unless the work has specific skill set that current OSSS staff do not possess.

The OSSS should begin with a thorough review of the work being completed by all OSSS contractors currently under contract. This review should include charting work that is mandated or required by federal or state law, work that is necessary due to alignment with the NDE’s Strategic Plan, projects contractors have undertaken due to lack of full-time NDE staff, and additional projects assigned to contractors. After completing a charting of all work being conducted by contractors, and taking into consideration the end date of current contracts, OSSS leadership and staff should plan to eliminate any projects not supporting the main purpose of OSSS as well as the NDE’s STIP. A prioritized list should then

⁵⁵ NDE, OSSS document provided to highlight STIP alignment, December 2024.

be created highlighting the project, the purpose of the project, how the project relates to the purpose and mission of OSSS, and duties required to carry out the project.

Through this process, any projects with a specific end date should be eliminated and only work that has no end date should be left on the priority list. An example would be the work being done to assist CSI, TSI, and ATSI schools; that work being done by the current contractor will continue for the foreseeable future. Once this list is completed work/projects can then be assigned to current OSSS staff. A significant part of this process will be the “clearing of the deck” of work being carried out by full-time OSSS staff. A thorough review by the new OSSS Director of every OSSS staff member’s current workload and job description is imperative: This will also support the concern of staff whereby it is believed there is an unequal workload distribution currently. A critical and ongoing component to this effort will be for OSSS leadership and staff to make the commitment to not start any new initiative or project without a thorough vetting process against the backdrop of the main purpose of OSSS.

FISCAL IMPACT

Depending upon the funding source used to pay for the contractor, the eventual elimination of the contracting position would free up funding to be used for additional FTEs or additional support to LEAs, students, and schools. For example, Title III, Part A funds are currently being used to pay for English Language Development services through contractors and those funds could be reallocated to provide supports to schools depending upon allowable costs within Title III, Part A. The total savings if this recommendation is fully implemented are estimated at a range of between \$948,480.00 to \$474,240.

EXHIBIT 3-11
TOTAL COST OF OSSS CONTRACTOR POSITIONS

Position	Pay Rate per HR	Number of hours worked per Year	Total Cost per Contractor	Number of positions	Total Cost
FT Contractor	\$35.00	2,080	\$72,800	17	\$1,237,600
FT Contractor	\$36.50	2,080	\$75,920	17	\$1,290,640
FT Contractor	\$38.00	2,080	\$79,040	17	\$1,343,680
FT Contractor	\$35.00	2,080	\$72,800	12	\$873,600
FT Contractor	\$36.50	2,080	\$75,920	12	\$911,040
FT Contractor	\$38.00	2,080	\$79,040	12	\$948,480
PT Contractor	\$35.00	1,040	\$36,400	17	\$618,800
PT Contractor	\$36.50	1,040	\$37,960	17	\$645,320
PT Contractor	\$38.00	1,040	\$39,520	17	\$671,840
PT Contractor	\$35.00	1,040	\$36,400	12	\$436,800
PT Contractor	\$36.50	1,040	\$37,960	12	\$455,520
PT Contractor	\$38.00	1,040	\$39,520	12	\$474,240

Source: Based on NDE salary information for contractors, 2024.

As illustrated in **Exhibit 3-11**, at a rate of between \$35.00/hr. to \$38.00/hr. with 40-hour work week (2,080 hours per year) would total between \$72,800.00-\$79,040.00 per contractor. With a total of 17 contracting positions minus five vacant contractor positions for a total of 12 fully staffed contracting positions, a total amount of funding used for contractors calculates to between \$873,600.00-\$948,480.00 a year. Even if the amount is calculated at 20 hours per week (1,040 hours per year), this

would still cost NDE a yearly cost of \$436,800.00-\$474,240.00 that could be used for FTEs or other supports.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30	Five Year Total
Eliminate contracting positions that entail work which should be completed by internal NDE staff	\$948,480-\$474,240	\$948,480-\$474,240	\$948,480-\$474,240	\$948,480-\$474,240	\$948,480-\$474,240	\$4,742,400-\$2,371,200

FINDING

The Office of Student and School Support (OSSS) does not have a department level Strategic Plan and a consistent continual monitoring process in place that illustrates focused goals and objectives throughout the entire office.

In a review of requested documents and the NDE and OSSS websites as well as conducting staff interviews, it was found there is currently no OSSS Office-level Strategic Plan or continual monitoring process in place to guide the work of the OSSS. Yet, this office is charged with the monitoring of LEA annual District Performance Plans (DPPs) and School Performance Plans (SPPs) for school improvement. For this reason, as well as providing much needed focus, a Strategic Plan for OSSS is critical to the alignment of goals and initiatives. During staff interviews, it was highlighted there is no overarching direction or coordination for the work being done in OSSS. Staff believe that through a course of leadership changes the work in some instances was created with no review of the “why;” this has led to low morale and staff feeling underappreciated and overtaxed. The high turnover rate of EPPs in OSSS, the lack of an Office Strategic Plan, and a continual monitoring process has led to instances of duplication of efforts among other Offices according to staff.

In conducting staff and LEA interviews, there was no clarity provided on what is guiding the work of staff in OSSS. The prior leadership of the OSSS left the NDE and, as revealed in interviews with staff and LEAs, the last two to three years have been fraught with unclear expectations and no clear direction. This has led to confusion in the office as well as in school districts (LEAs). The lack of leadership has led to dilution of mission of OSSS and confusion as to compliance vs. support/programming. In mid-September 2024, a new OSSS Director was hired, and staff have a renewed sense of purpose and are hopeful the new Director will provide much needed leadership and guidance.

There are three Education Program Supervisor positions within OSSS (during the onsite interviews in October 2024 only one of the EPS positions was filled) and according to staff, each area under the direction of an EPS runs differently. In one area, progress is monitored through Excel spreadsheets and color coded according to the STIP goals and strategies. In a review of documents provided by OSSS, several examples of progress monitoring were reviewed. The Excel spreadsheets included work completed by the respective area of OSSS such as Title I, Title IV, Part B, and GEAR UP. These documents also included the work of other areas such as the Student Investment Division and Office of Inclusionary Education. The documents reviewed demonstrated an effort to document progress towards meeting STIP goals as well as strategies used. It was not clear as to who “owns” the responsibility to update the documents or how often an update is conducted.

RECOMMENDATION 3-6:

Align efforts within OSSS as well as other Divisions in NDE to develop a two- to three-year OSSS Strategic Plan using the NDE Statewide Plan for Improvement of Pupils (STIP) ([Strategic Improvement Plan](#)) as a guiding document and align the plan to a monitoring system for continual implementation monitoring.

The creation of a two- to three-year Strategic Plan will enable OSSS leadership and staff to focus exclusively on the “why” and provide a road map that can be referred to by staff as well as other stakeholders. Going through the strategic planning process will also be a valuable process for the new OSSS leadership and staff to build trust and cohesion of purpose. In interviews with the new OSSS Director, it was apparent this would be a high priority. The *U.S. Department of Education’s What Works Clearinghouse* (<http://ies.ed.gov/ncee/wwc/>) provides several examples of the strategic planning process that can be used to develop a new plan.

Another advantage of having a well-designed Strategic Plan is that through the development of the plan, staff will develop short- and long-term strategies to accomplish goals and objectives. OSSS should use the monitoring of DPPs and SPPs as an example to build goals and strategies. For example:

Goal: Development and implementation of a template for DPP and SPP monitoring.

Objective: By the end of SY20XX, OSSS will implement a revised process and timelines for the monitoring of DPPs and SPPs.

Strategy: Through a comprehensive, collaborative, and transparent process and in coordination with the Design Team, select a template that incorporates all required areas of compliance for the monitoring of DPPs and SPPs.

Responsibility/Owner(s): OSSS School Improvement and Design Team

As described above, this process can alleviate the unfortunate issue that occurred with the last DPP and SPP template which fell short of expectations. In interviews with LEAs, it was noted that after a lengthy engagement process with the LEAs and due to a lack of communication and transparency by prior OSSS leadership on the selection of a template with an outside vendor, the districts and schools were not provided clear direction with the DPP and SPP process. In addition, the new template was shared with site administrators before being shown to district-level staff. Having a stated goal, objective, strategy, timeline, and owner of this process would go a long way toward building trust and strong relationships among the LEAs with the school improvement process.

A Strategic Plan should entail the mission, vision, goals, strategies, measures of success, timelines, responsible parties/owners, and initiatives to be completed during the time of the Strategic Plan. A Google search will bring up multiple examples of education-related Strategic Plans.⁵⁶

The purpose of creating a Strategic Plan is important as it provides leadership and staff with a blueprint for the direction of the organization.

⁵⁶ [Education Strategic Plan Template - Search Images.](#)

“One fundamental purpose of having and executing a strategic plan is to ensure that various business areas are all moving in the same direction and that company resources are being allocated properly.

Without this direction, departments throughout the organization will simply focus on their pet projects without any concern for the bigger picture. There will be no rhyme or reason for how financial and human resources are allocated. At best, this can lead to recurring problems or issues that require leadership’s attention rather than managing the organization for success.”⁵⁷

One method for the creation of a Strategic Plan involves five steps:⁵⁸

1. Define the vision of the organization.
2. Assess where the organization is at through an analysis of data.
3. Determine the priorities and objectives of the organization.
4. Define responsibilities with owners of each initiative.
5. Measure and evaluate results on a continual basis.

The first step is to create a clear vision for the OSSS. What is the north star for OSSS to accomplish its priorities? This will be an opportunity for the Director of OSSS to engage the entire OSSS team which can bring diverse perspectives to the table. The vision should align with OSSS core values and its purpose. It is important to have an ambitious vision; however, one that is achievable and relevant to the overall mission of the work of OSSS. The second step is for OSSS leadership and staff to assess where OSSS is regarding initiatives and priorities. This can be accomplished through completion of a SWOT analysis:

Strengths: What are the strengths of OSSS?

Weaknesses: Where are the vulnerabilities in OSSS?

Opportunities: Where are the areas for improvement through OSSS?

Threats: Are there existing or potential threats that could limit the success of OSSS?

The SWOT analysis is another opportunity for a team-building exercise and provides staff with the ability to discuss openly where they believe OSSS strengths and areas of improvement to be in relation to support of LEAs, students, and the NDE overall. The third step in the creation of a Strategic Plan is to create a draft document that outlines the priorities and objectives of OSSS. The priorities and objectives need to be achievable and, most notably, able to be accomplished with available resources. A best practice is to accomplish this step through the SMART framework:

Specific: OSSS should set clear objectives with an eye towards desired outcomes.

Measurable: OSSS should use criteria that are quantifiable and able to be measured.

Achievable: OSSS needs to be realistic on what it can achieve with available resources and time constraints.

⁵⁷ [6 Reasons Why Every Organization Needs a Strategic Plan - Strategic Decision Solutions](#), internet search December 29, 2024.

⁵⁸ [The 5 steps of the strategic planning process | Mural](#).

Relevant: OSSS should develop objectives that are applicable to the overall goals of the STIP and not over broad or incongruent to the vision of OSSS.

Time-bound: Each objective developed should have a clear timeline for completion and emphasize urgency and focus.

The use of the SMART process will provide an opportunity for OSSS leadership and staff to “weed out” initiatives that are not aligned to the overall vision and mission of the Office. It will be critical for the team to remain focused and committed through this process as there may be a temptation to add initiatives at this juncture.

The fourth step in the creation of a Strategic Plan is the defining of responsibilities and owners of each objective. This step is to ensure there is a responsible owner for each goal, objective and initiative within the Strategic Plan. The owner of the task should be assigned by title, not name, in the event during the time of the Strategic Plan there is staff turnover; this will ensure consistency and follow-through. This will also be the time for OSSS leadership and staff to define Key Performance Indicators (KPIs) to track results against relevant data.

The fifth and final step in the creation of a Strategic Plan is measuring and monitoring results. In reviewing documents provided by OSSS staff, it is evident there is monitoring of initiatives and projects; however, it is not known who owns the monitoring process or how regularly it is carried out. OSSS should agree upon a method to monitor results that indicate success or opportunities to improve. In this way, OSSS leadership and staff can be aligned to evaluate progress at regular time intervals. Monitoring and documentation of monitoring should be done at least on a quarterly basis. The dates for such monitoring should be shared with OSSS staff to ensure everyone is aware of when the progress checks will be carried out.

Upon completion of the OSSS Strategic Plan, it is recommended that OSSS leadership share the document with other Offices within NDE as well as NDE leadership. This will help in communicating the direction of OSSS as well as providing other Offices with information and data that will encourage collaboration and further reduction in silos. It is also recommended to leverage the NDE website in providing a link on the OSSS page for the Strategic Plan for LEAs and other stakeholders to have access to the plan and any external documents related to the Strategic Plan.

FISCAL IMPACT

This recommendation can be implemented with existing resources. There should be a budget tied to each Goal, Objective, and Initiative within the Strategic Plan. The budget should identify the source of funds as in federal, state or local sources. If the Initiative involves grant funding, the time limits of the funding should be clearly stated in the Strategic Plan.

FINDING

The Office of Student and School Support (OSSS) has provided guidance to LEAs which conflicts with guidance provided by the Grants Management Unit (GMU) leading to mixed messages delivered to LEAs.

In interviews with LEA staff and OSSS staff, the issue of conflicting guidance between the OSSS and the GMU was a common theme. This issue came up frequently for federal program guidance such as Title I. LEA staff gave numerous examples of conflicting messages including information and guidance related to

Title I and what is allowable and not allowable in the use of federal funds. Another example was the approval of the use of federal funds on the program side and then being told it was unallowable on the GMU side. This situation typically occurs when there is a new EPP in the OSSS. This has led to LEAs having to redo work or in some cases led to fiscal implications such as having to revert funds back to the NDE or U.S. DOE. Due to inaccurate guidance and the time taken to get correct guidance, the situation has also led to some issues in the LEAs hiring staff late in the academic school year. A review of contact logs provided by OSSS staff indicates there are instances of miscommunication, inaccurate forms being used, or new processes that were put into place by GMU without the knowledge of OSSS staff.

In reviewing LEA survey data, participants were asked to agree or disagree with the statement: **NDE Divisions collaboratively provide unified and coordinated messages and directions.**

Out of 130 respondents, the results indicated 37.69 percent Disagreed and 26.92 percent Strongly Disagreed with the statement.

Another survey question asked participants: **Do you ever receive duplicative and/or inconsistent directives from Offices/Divisions of the NDE?**

Out of 130 respondents, the results indicated 46.92 percent responded YES and 33.85 percent responded SOMETIMES.

Comments pointed to grants both on the programmatic and fiscal sides providing conflicting guidance.

RECOMMENDATION 3-7:

Ensure that OSSS and GMU thoroughly coordinate and vet communication and guidance before distributing to the LEAs. Each Office should agree with the guidance sent to avoid sending conflicting guidance. The development of standard procedures and practices for communication with LEAs is essential.

The guidance provided by OSSS and GMU is critically important to ensure that LEAs follow federal and state law in relation to grants and federal programs. There can be negative implications to LEAs when guidance is not followed; having the additional layer of being provided inaccurate guidance at the outset only compounds this situation. There is also the element of the amount of time involved for both staff of the OSSS and GMU having to correct and resend accurate guidance. Although it is important for the correct guidance to be provided, all of this can have the effect of diminishing the trust built between the LEA, OSSS, and the GMU when correct guidance should have been provided at the outset.

Staff from both OSSS and the GMU should spend time planning communications that will be disseminated to LEAs to ensure it is accurate. This is especially important for new EPPs in both areas; there should be a level of verification of accuracy conducted by either a veteran EPP or EPS.

In addition, any new mandated computer-based program or process OSSS deems essential should be thoroughly field tested *before* it is released to LEAs. In numerous interviews with LEA staff, it was stated there were frequent cases of new computer-based programs, forms, or platforms released through OSSS only found to be not user friendly, time intense, and cumbersome.

Regular and frequent communication between OSSS and GMU will curtail the problem of providing inaccurate guidance being provided to LEAs. This can be accomplished through a set of communication

procedures agreed upon by OSSS and the GMU. For example, with the prior knowledge of federal funds being distributed such as Title I funds, before any communication is sent out to LEAs, responsible parties of OSSS and GMU should coordinate together any guidance provided. This will ensure both Offices are in alignment with the guidance provided to the LEAs.

The directors of each office should develop and coordinate an annual calendar of standard communication to LEAs to ensure timely and accurate information is being provided. The calendar should be vetted by both OSSS and GMU and shared with all responsible parties for communication with LEAs. New EPPs in both OSSS and GMU should be provided an orientation to the calendar and its purpose.

When it comes to questions from LEAs to OSSS regarding grants or programmatic areas with a fiscal implication, before responding back to the LEA, it would be best practice for OSSS staff to share the draft response with the GMU. Although this may be an additional step and takes additional time, it has the added benefit of verifying the guidance so that a corrected version of the guidance is not needed, thus saving time.

In the case of new computer-based programs, platforms or forms, OSSS should test these thoroughly internally first. Next, selecting a few LEAs to test the process or program far in advance of full implementation would also be good practice. In this manner, any issues or non-user-friendly aspects can be vetted in a collaborative manner before full release to all LEAs.

FISCAL IMPACT

The recommendation can be implemented with existing resources.

FINDING

The Office of Student and School Supports mandated Programmatic Risk Assessment was implemented with a lack of communication, transparency, and clarity which led to unnecessary tension between OSSS and LEA staff.

In several interviews with LEA staff, it was evident the Programmatic Risk Assessment process was a topic of consternation. There was appreciation from LEA staff for the federal and state mandates regarding risk assessment; however, the overall process used by OSSS and the way it has been communicated and implemented is not conducive to fostering productive relationships with LEAs. In fact, in interviews with OSSS staff, there was agreement that the current process is duplicative and inefficient. This is mainly due to the programmatic and fiscal risk assessments being split into two separate functions: The programmatic assessment is being led by OSSS staff, and the fiscal risk assessment is being led by the Student Investment Division (SID). In the past, the two different risk assessments (programmatic and fiscal) were consolidated into one assessment.

In its current form, the Programmatic Risk Assessment uses four categories to rate LEAs. The following are the points assigned to each category:⁵⁹

- **Category 1-Audit Performance-3 points**
 1. Title I Comparability Audits-3 points
- **Category 2-Academic Achievement-33 points**
 2. Average (mean) Index Scores of all LEA CSI and MRI schools- 6 points (double)
 3. Percentage of English Learner proficiency- 3 points
 4. Nevada School Performance Framework (NSPF) index scores- 6 points (double)
 5. College and Career Readiness-3 points
 6. Chronic Absenteeism- 6 points (double)
 7. 4-year Cohort Graduation Rate- 3 points
 8. 4-year Cohort Graduation Rates for Students Identified as Economically Disadvantaged-3 points
 9. Read by Grade 3-3 points
- **Category 3-Grant Management- 9 points**
 10. Timeliness of Federal Grant Application Submission- 3 points
 11. Changes in Key Grant Management and Leadership Personnel-3 points
 12. Programmatic Desktop/onsite Monitoring Submissions-3 points
- **Category 4-Empowering Student Learning- 6 points**
 13. LEA School Performance Plans (SPP)- 3 points
 14. Submittal of Emergency Operation Plan (EOP)- 3 points

The Scoring Methodology is as follows:

Scoring Methodology

1. Scores on the 14 indicators are combined to a maximum score out of a potential 51 points.
 - a. The fewer points assigned to each subrecipient per indicator/category, the lower the risk percentage and score.
 - b. Risk indicators are scored as applicable to each subrecipient. If an indicator does not apply to a certain subrecipient, the potential total number of points will be lower than 51.
 - For example, if an LEA does not have Title I Comparability Audits, their score will only address 13 of the indicators and will be out of a possible total of 48 points.
2. Subrecipients' scores will be converted into percentages and rounded to the nearest whole number to determine an overall risk level of Low, Medium, or High.
 - For example, if a subrecipient earns a total of 15 points out of a possible 51, their score would be 29 percent (15/51).
 - As detailed in the table below, a risk score of 29 percent is considered "Low".

⁵⁹ OSSS, NDE, December 2024.

Risk Assessment Results Example⁶⁰

Risk Level	Risk Score
Low Risk	Scores between 1-29%
Medium Risk	Scores between 30-46%
High Risk	Scores at or above 47%

RISK ASSESSMENT RESULTS EXAMPLE			
Points	Max Points	Risk Level	Risk Score
15	51	LOW	29%

The following information was provided as rational for the categories and sub-categories within the Programmatic Risk Assessment:⁶¹

Category 1 – Audit/Monitoring Performance

Risk Indicator	Rationale
1. Title I Comparability Audits	Title I comparability audits are conducted to ensure that Local Education Agencies (LEAs) are either exempt from Title I comparability requirements or are meeting Title I goals as outlined by federal reporting standards. LEA compliance issues can be an indicator of elevated risk.

Category 2 – Academic Achievement

Risk Indicator	Rationale
2. Comprehensive Support and Improvement (CSI) and More Rigorous Interventions (MRI) Schools - the average (mean) Index Scores of all LEA CSI and MRI schools from the most current reporting year measuring the subrecipients trajectory to exit status. (Double points)	The CSI schools are designated as the lowest performing schools in the state, (lowest 5%) and/or schools with a 67% or less graduation rate. This indicator measures an LEA's capacity and/or ability to effectively address the urgent needs of schools and students that are performing significantly below standards.
3. Percentage of English Learner proficiency (met exit criteria) based on English Language Proficiency Assessment (ELPA) results as measured by World-class Instructional Design and Assessment (WIDA) ACCESS.	Percentage of English Learners proficient (meet exit criteria) based on the English Language Proficiency Assessment (ELPA) results as measured by WIDA ACCESS and WIDA Alternate ACCESS. There is a strong correlation between meeting academic English language proficiency and content proficiency).

⁶⁰ NDE, OSSS, December 2024.

⁶¹ NDE, OSSS, December 2024.

Efficiency Assessment for the Nevada Department of Education

Risk Indicator	Rationale
4. The performance of schools in a district- based on Nevada School Performance Framework (NSPF) index scores. (Double Points)	This indicator measures an LEA's risk to effectively address the urgent needs of schools and students that are performing significantly below standards. An index score of 50 or above identifies a school that has met or exceeded the state's standard for performance (3, 4, or 5 star rated school). The all-students group has, at a minimum, met expectations for academic achievement or growth. Subgroups with an index score near or below 1-star rating are not meeting academic achievement or growth standards.
5. Rate of students obtaining their Advanced or College and Career Readiness (CCR) Diploma.	This indicator measures the LEAs success in increasing the student participation in Advanced Placement (AP) courses leading to the number and percentage of students receiving an advanced or CCR diploma.
6. The district's all student rate of chronic absenteeism. (Double Points)	Chronic absenteeism is defined as students missing 10% or more of a school year or students missing at least 10 days. This indicator identifies the LEA and/or school capacity and abilities to implement successful interventions to sustain student populations. Research shows that for student achievement, what matters is the number of days a student misses, not the reason. It has strong relationships with achievement and graduation rates and is a key indicator for student success.
7. 4-year Cohort Graduation Rates.	This indicator measures the percentage of students in an adjusted cohort who graduate within 4 or 5 years with a state recognized regular high school diploma. This indicates the LEAs implementation of differentiated supports and resources to meet the needs of all students. This factor serves as a key indicator of a LEA's success in advancing their student population and helping those students receive their high school diploma within a specified time.
8. The 4-year Cohort Graduation Rates for students who have been identified as economically disadvantaged based on Free and Reduced-Priced Lunch (FRL) data.	This indicator measures the percentage of students in an adjusted cohort who graduate within 4 years with a state recognized regular high school diploma. This indicates the LEAs implementation of differentiated supports and resources to meet the needs of all students. This factor serves as a key indicator of a LEA's success in advancing their student population and helping those students receive their high school diploma within a specified time.
9. Read by Grade 3 based on the percentage of all Grade 3 students reaching proficiency on the CRT ELA assessment (includes Smarter and NAA).	A key predictor of school success and high school graduation is the ability to read on grade level by the end of third grade. Proficiency in reading not only impacts young students but can severely limit access to education and economic opportunities as students grow up. AB 289 (2019), Nevada's Read by Grade 3 Act established a statewide system of identifying students who are at risk for not being proficient in reading. This indicator can identify the potential risk of students based on the percentage of students who are reading proficiently.

Category 3 – Grant Management

Risk Indicator	Rationale
10. Timely Federal Title Grant Funding Application Submission	LEAs are required by Uniform Grant Guidance to have their Funding Applications approved (e-Page) prior to obligating and spending federal funds. The lack of timely and accurate submissions of the funding application, to include acknowledgment or acceptance of the assurances may be an indicator of risk. Unclear or vague objectives, resources that are not clearly aligned to prioritized needs or grant objectives can be risk factors that interfere with the effective implementation of the grant project. If ambiguity exists within the project objectives or how effectiveness of funds will be measured, the risk for using grant funds for expenditures outside the scope of the project may increase.
11. Change in Key Grant Management/Leadership Personnel	Leadership turnover impacts program performance on many levels including costs to fill a vacant position and leadership ramp-up time and may impact retention of other personnel. There is often a negative impact to team morale, engagement, and efficiency as the workplace adapts to new team dynamics.
12. Federal Titles Programmatic Desktop Monitoring requirements completed on time.	Desktop programmatic monitoring submissions, required of LEA sub-recipients, need to be abided by as outlined in ESSA. Compliance indicators within the report submissions help to demonstrate evidence and compliance with Federal law. Late submissions, and/or submissions that do not meet the compliance indicators for the particular item; can be elevated risk factors that interfere with effective implementation of the grant.

Category 4 – Empowering Student Learning

Risk Indicator	Rationale
13. Timeliness of LEA School Performance Plans (SPP) submission	Each school receiving formula funds under ESSA (e.g., Title I, Title II, Title III, and Title IV) and operating a Schoolwide Program (SWP) with the involvement of stakeholders must develop a comprehensive written SPP to address student needs and improve teaching and learning throughout the school for LEA approval and SEA monitoring. SPP submissions must include plan requirements as prescribed by Chapter 501, of State regulation Assembly Bill-AB7.
14. LEA submission of its Emergency Operations Plan (EOP)	Providing a safe and accepting learning environment will foster meaningful relationships that support student academic, social, and emotional success.

Notably absent from the rationale document are citations from federal or state guidance on the specific Categories or Sub-categories selected by OSSS. Having these citations would help build confidence in the process. There are also sub-categories which seem to be arbitrary and lend themselves to critical observations from LEAs. Examples include: (1) There is no explanation as to why certain measures are more emphasized than others in points (6 points vs. 3 points), including Index scores of CSI and MRI schools, index scores on schools' NSPF, and chronic absenteeism. (2) While the percentage of English Learner proficiency is an important measure of academic achievement, what is the relation to measuring Risk for an LEA? (3) Change in Key Grant Management/Leadership Personnel; there is no explanation as to *what* positions are being measured for Risk and why those positions are related to risk. (4) The LEA submission of an Emergency Operations Plan to the SEA is in statute; however, there is no relation to risk provided in the rationale. A better measure of risk would be the Continuity of Operations Plan (COOP) for the LEA.

RECOMMENDATION 3-8:

Ensure that the Programmatic Risk Assessment is based on federal and state law and regulation and developed through a collaborative and transparent method with the LEAs; the support of the LEAs should be a focus of the Programmatic Risk Assessment.

RECOMMENDATION 3-9:

Ensure a joint Risk Assessment is created including both fiscal and programmatic factors.

The use of a Risk Assessment is mandated by the U.S. Department of Education (USDOE) to ensure accountability with the use of federal program funds. According to the Council of Chief State School Officers (CCSSO), a Risk Assessment allows the State Education Agency (SEA) to promote more effective uses of funds and benefit ESSA implementation at the local level.⁶²

The risk assessment process permits SEAs to differentiate oversight based on local needs. This has the potential to reduce burden for both the SEA and its LEAs, and also ensures LEAs get the specific supports they need to run effective and compliant ESSA programs (CCSSO, 2017).

As articulated in the CCSSO's Guide ([ccsso state authority over essa programs.pdf](#)),⁶³ the SEA should develop a Risk Assessment process that is:

- consistent with federal requirements;
- use the results of the Risk Assessment to inform monitoring; and
- consider imposing specific conditions if needed to address risks.

In addition, SEAs can also:

- develop guidance for LEAs on managing compliance risks;
- develop guidance for LEAs that connects compliance obligations to effective program performance;
- incorporate program performance considerations into the risk assessment process when connected to federal compliance requirements; and/or
- provide targeted, intensive supports to higher risk LEAs

As another source of justification for the need Risk Assessments, the USDOE lists the following as a source for Frequently Asked Questions regarding Uniform Guidance on federal programs and risk assessments: [faqg-uniform-guidance](#). In addition the USDOE provides the following information on their website: [Risk Management Tools | U.S. Department of Education](#).

OSSS should base the Risk Assessment on federal and state regulations. There should be emphasis placed on categories that truly represent finding *risk* associated with programs. The ultimate outcome of the Risk Assessment should be to assess the *risk* and provide support to those LEAs with *higher risk*.

⁶² Council of Chief State School Officers, *A Guide to State Educational Agency Oversight Responsibilities Under ESSA*, 2017.

⁶³ Id.

According to the CCSSO, the less likely the LEA will comply with federal requirements, the more oversight it needs from its SEA. By OSSS organizing their oversight activities to an LEA's level of risk, it should assist OSSS in focusing on its limited resources where needs are greatest. OSSS should use the results of the Risk Assessment to decide how to monitor each LEA. Additionally, the results of the Risk Assessment may also inform whether OSSS should set specific conditions on an LEA's subgrant.

Finally, according to the CCSSO, the Risk Assessment process is designed to evaluate compliance risks through factors such as:

- The LEA's prior experience with the same or similar federal programs;
- The extent to which the LEA is audited through the single audit process and the results of previous audits;
- Whether the LEA has new personnel or new or substantially changed systems; and
- The extent to which the LEA has been monitored by USDOE and the results of that monitoring.

The first step in the development of the Risk Assessment would be for both OSSS and SID to agree to the need for one risk assessment to measure both programmatic and fiscal risk among the LEAs. In this agreement, the refinement of what is required to measure risk in both areas should be a main emphasis. This effort will be important to eliminate instances of duplication between the two current risk assessments. There should also be emphasis on ways to incorporate already required documents and processes into the risk assessment. For example, if there are components of the DPPs and SPPs that can be used either as actual risk measures or as evidence, this should be considered.

Next, a concerted effort should be made to engage LEAs in the building of the risk assessment. A special consideration of the capacity of the rural LEAs to complete complex evidence collection is warranted. In a similar fashion, there should be a limit placed on the actual evidence pieces requested by the OSSS/SID risk assessment. There should be a realistic expectation that the NDE does not have the capacity to review thousands of pages of evidence for each of the LEAs; the collection of articles of evidence needs to be clearly defined within the risk assessment itself.

In working with LEAs, a review of other states' risk assessment processes would be encouraged to see how other SEAs have developed and implemented risk assessments. There are examples of SEAs that have implemented prescriptive and detailed methods of calculating risk while other SEAs have established general monitoring practices and developed protocols, tools, and instruments to conduct monitoring activities. Three examples of other states' risk assessment practices follow:

Texas: [Federal Fiscal Monitoring Division | Texas Education Agency](#)

Oklahoma: [PowerPoint Presentation](#)

Once the review of other SEAs risk assessments has been completed, a discussion with all stakeholders on the relevant factors needed for a well-balanced risk assessment should ensue. Again, the goal is to create a process whereby actual risk is measured on both the programmatic and fiscal sides. The final risk assessment tool should be one that emphasizes measurement of risk and has been created through a transparent and collaborative process. The final tool should then be shared on the NDE website with links to necessary documents for ease of use as well as to emphasize transparency.

Once a risk assessment tool has been developed and agreed upon, the implementation of the process including detailed timelines should be developed. After a full implementation cycle of the risk

assessment has been completed, the same stakeholders should reconvene to refine any areas of improvement needed.

Finally, there may also be some consideration given to highlight the work undertaken to develop the risk assessment with the emphasis on transparency and a collaborative approach to measuring risk. Presentations to other organizations such as the Nevada Association of School Boards (NASB), the National School Board Association (NSBA), or the Council of Great City Schools (CGCS) celebrate best practices from SEAs and LEAs. This would be a way for the NDE and LEAs to share their work together and to highlight a collaborative approach for measuring risk.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

OFFICE OF ASSESSMENT, DATA, AND ACCOUNTABILITY MANAGEMENT

The Office of Assessment, Data, and Accountability Management (ADAM) consists of three offices that perform several functions critical to the effectiveness of the Nevada Department of Education as a change agent by informing the evaluation of the effectiveness of schools, districts, and state and federal improvement programs.

According to the office's webpage, the "Office's crosscutting mission is central to all Nevada Department of Education offices and to Nevada districts, schools, parents, and educators." ADAM provides data to inform the improvement of systems of support aligned to the goals and objectives of the Nevada State Improvement Plan. ADAM ensures the validity, reliability, and transparency of all processes around the collection, management, and production of data related to the State-required assessments and to the statewide system of accountability.

ADAM creates assessment, information technology (IT), and accountability communications that are interpreted by internal and external stakeholders. The ADAM office is the gate keeper for all data requests, fulfilling both external and internal data requests to support education programming in a timely manner. ADAM creates, maintains, and shares annual calendars showing the deliverable dates for collection, validation and reporting.

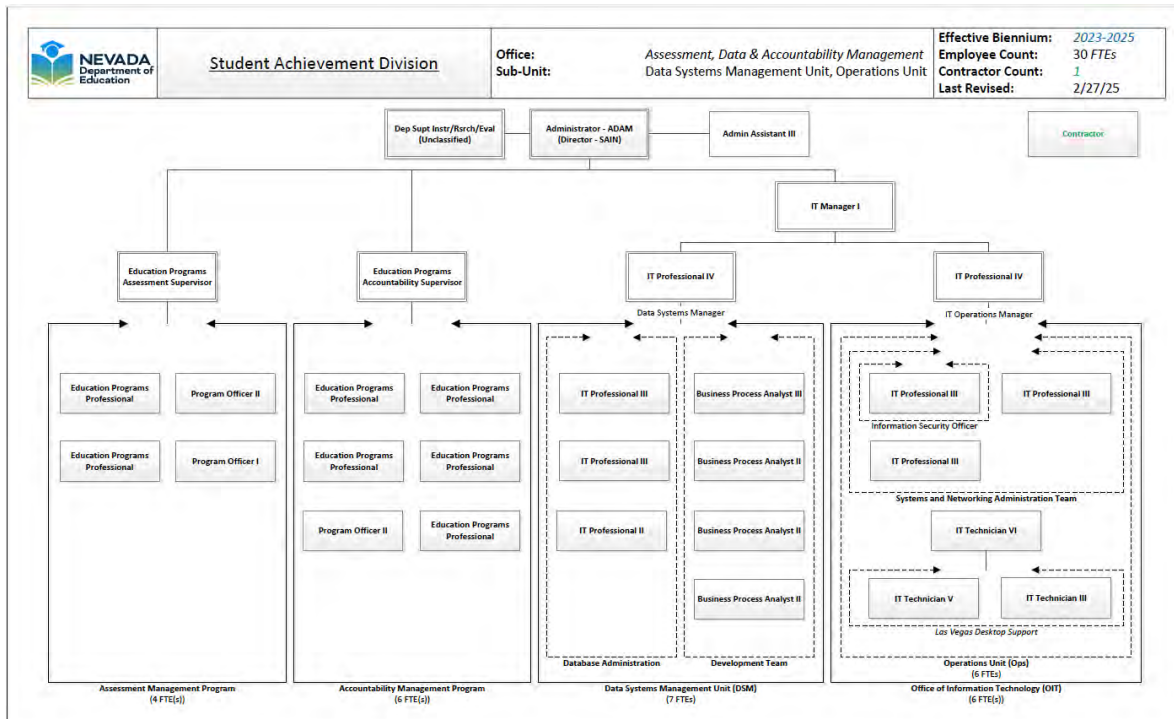
Organization and Management

The Office of Assessment, Data, and Accountability Management (ADAM) consists of three offices:

- The Office of Accountability
- The Office of Assessment
- The Office of Information Technology

Exhibit 3-12 shows the current structure of the ADAM office. As shown, the ADAM Director reports directly to the Deputy Superintendent for Instruction, Research, and Evaluation. The Director oversees two Education Program Supervisors, one for Assessment and the other for Accountability and an IT Manager I for the Office of Information Technology.

EXHIBIT 3-12
ORGANIZATIONAL CHART
OFFICE OF ASSESSMENT, DATA, AND ACCOUNTABILITY MANAGEMENT



Source: Nevada Department of Education, ADAM Office, February 2025.

Due to the nature of the agencywide work performed with Information Technology, the background, findings, commendations and recommendations are presented in a separate section entitled Information Technology. Information on the Office of Assessment and Accountability are presented here under the subtitle of Assessment and Accountability.

ASSESSMENT AND ACCOUNTABILITY

Budget Information for Assessment and Accountability

As shown in **Exhibit 3-13**, the budget code 2697 is used to fund several testing programs mandated by the Legislature and administered by the Department of Education.

Approximately 79 percent of the budget is used for the cost of assessments, either through contracts or a direct cost.

EXHIBIT 3-13
ADAM BUDGET 2024 AND 2025

1	PERSONNEL	\$1,525,215	\$1,550,884
4	OPERATING EXPENSES	\$8,358	\$8,358
11	MAP ASSESSMENT	\$1,969,680	\$2,027,680
12	INDIRECT COST	\$327,874	\$462,026
25	ESSA REPORTING	\$416,508	\$416,508

2697	Category	Tot FY 2024	Tot FY 2025
26	INFORMATION SERVICES	\$10,195	\$10,184
33	ACADEMIC STANDARDS COUNCIL	\$1,057	\$1,057
44	STATE ASSESSMENT ADMIN	\$78,740	\$71,528
45	STATE ASSESSMENTS CONTRACTS	\$15,714,308	\$15,714,308
50	RAND CORPORATION	\$40,950	\$50,000
58	COMPUTER EQUIPMENT SB500	\$4,808	\$328
70	NATIONAL COOP STATISTICS	\$24,054	\$17,436
74	NAEP TASK ORDER	\$310,730	\$337,459
82	DEPARTMENT COST ALLOCATION	\$4,075	\$4,075
86	RESERVE	\$2,189,614	\$1,750,945
87	PURCHASING ASSESSMENT	\$932	\$932
88	STATEWIDE COST ALLOCATION PLAN	\$0	\$0
93		\$55,057	\$0
	TOTAL	\$22,682,155	\$22,423,708

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

The budget account is primarily funded by General Fund appropriations. The 2001 Legislature provided funds to support a contract with a nationally recognized testing company for the development, printing, scoring, and reporting of the Criterion-Referenced Tests (CRTs) in grades 3-8. Using the CRT program for purposes of school accountability is required for Federal Title I compliance and by NRS 385. As per NRS 390 105 and US PL 114-95, examinations measuring proficiency and achievement in reading, writing, and mathematics are to be administered in grades 3-8. These same laws require administration of examinations measuring proficiency and achievement in science in grades 5, 8, and high school prior to grade 11.

As per NRS 390 610, a College and Career Readiness assessment is required. This assessment also fulfills the requirement of US PL 114-95 to measure proficiency and achievement in reading, writing, and mathematics in high school. Established in the 2015 Legislative session and updated in 2019, NRS 388 157 requires the assessment of all kindergarten through third grade students reading ability via a valid and reliable assessment selected by the State Board of Education. This assessment is to be developed, scored, and reported by a nationally recognized testing company according to NRS 390 105. The Academic Standards Council provides funding to support operational costs in support of the Council to Establish Academic Standards for Public Schools.

The Academic Standards Council has been designated through NRS 390 115 as the sole entity within the state responsible for the establishment, periodic review, and prioritization of content and performance standards in the subject areas of English, mathematics, science, social studies, the arts, computer and technology education, health, and physical education. Funding for the Student Accountability Information in the Nevada data system and a Report Card required by NRS 385 are part of this budget account. This state reporting system captures students via unique identifications and tracks their progress through the education system, including their test results on the above-mentioned tests (Statutory authority: NRS Chapter 387, NRS Chapter 390; 2001 17th Special Session Senate Bill 2 and Senate Bill 13).

FINDING

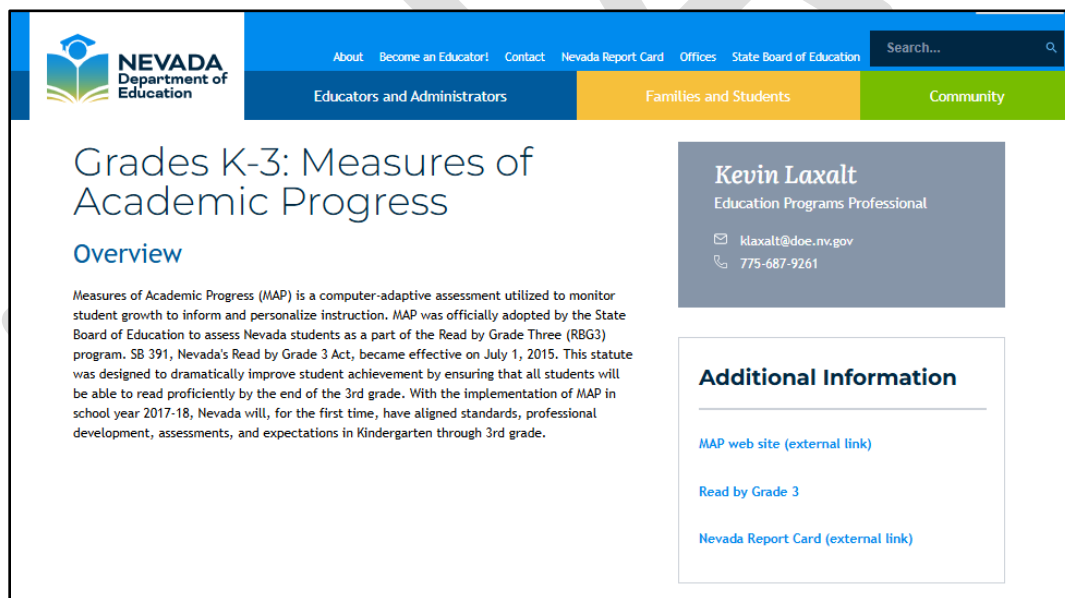
The ADAM office provides information for school districts, students, and the general public to not only help them navigate assessment and accountability systems, but also to ensure a level of transparency about the processes and the outcomes.

The ADAM office has developed and publicly published detailed procedures and technical manuals that not only guide internal processes and procedures, many of which are published and available on the NDE website. In addition, ADAM also offers in-depth technical assistance in guided formats to districts and schools.

The ADAM website includes manuals, policies, and procures to assist schools and also inform parents, students, and the public of the processes and procedures.

The Assessments page on the NDE website lists all the various assessments by grade level and type, provides links to testing calendars, test security procedures, and the like. As shown in **Exhibit 3-14**, when the user clicks on one of the listed tests, the next screen provides a brief explanation of the test with links to additional resources.

EXHIBIT 3-14
EXAMPLE OF ASSESSMENT INFORMATION ON NDE WEBSITE



Source: NDE Website: <https://doe.nv.gov/offices/office-of-assessment-data-and-accountability-management-adam/office-of-assessments>.

As shown, every page on the ADAM website contains names and contact information when a user has questions or concerns or needs assistance navigating the site.

The Accountability section of the website contains links to the following information:⁶⁴

- [Nevada Accountability Portal](#)
 - [Nevada Report Card](#)
 - [Nevada School Performance Framework](#)
 - [Alternative Performance Framework](#)
- [Nevada Growth Model](#)
- [EDFacts](#)
- [Acing Accountability](#)
- [Data Request Management](#)

Each link expands to provide user friendly guidance, explanations and access to statewide and school level data.

COMMENDATION 3-J:

The Office of Assessment, Data, and Accountability Management has developed processes, procedures, and online documentation that increases transparency and provides useful resources for schools, parents, students and the general public.

FINDING

The functions within ADAM are highly data driven, with heavy emphasis on the information technology required to support both the statewide accountability and assessment functions; despite the organizational placement of ADAM within the Student Achievement Division, there is a significant disconnect from the curriculum functions which these systems are designed to inform.

Currently, ADAM's director reports directly to the Deputy for Student Achievement and is also responsible for oversight of all Information Technology (IT) services for the agency. IT and all related functions are discussed in greater detail in **Section 6** of this report. Most assessment functions are computer driven with testing, recording, and reporting being primarily carried out online. The Nevada Accountability System rates schools based on student performance which is then reported online through the portal. The Accountability Office submits all the required EDFacts files to the USDOE's EDFacts system. The ADAM IT framework is one of many functions supported by the Office of Information Technology which is organizationally under the ADAM umbrella.

One of the ways districts use the information from the different accountability systems is for improvement purposes. However, at the statewide level, when ADAM identifies schools and districts in need of improvement and support, that responsibility is transferred to the Office of Student and School Supports. The school support responsibility is not aligned with the accountability and assessment functions—ADAM releases the ratings publicly; however, there is no evident follow-through that could be used to improve the assessments or the statewide accountability processes.

The Assessment Office holds item and bias reviews with local educators throughout the state annually. This ensures the assessments meet the needs of the students and the Office receives feedback on the

⁶⁴ <https://doe.nv.gov/offices/office-of-assessment-data-and-accountability-management-adam/accountability>, 2024.

assessments. However, interviews with ADAM staff and district personnel confirmed that once the ratings are made public, the ADAM office has no further responsibility for providing support to the schools. The absence of a feedback mechanism creates disconnect between and among what is taught, what is tested, and the support districts and schools may need to make substantive improvements.

Best practices in high performing schools indicate that there is alignment among what is commonly known as the curriculum, instruction, and assessment (CIA) triangle. Curriculum includes the standards of content that should be taught; Instruction is the actual teaching of the curriculum; and the Assessment is the testing of students based on the standards of content which are contained in the curriculum. If the tests are not aligned to the standards of content, the performance results can be seriously flawed. When the curriculum and instruction side of the house makes changes or enhancements, but the assessments continue to ask the same questions in the same ways, there is a disconnect. There should be a cyclical flow of information among the CIA triangle, creating a feedback control system for continuous improvement and growth.

The Teaching and Learning website states: “Our office is dedicated to serving as a model for effective teaching and learning practices, providing educators with guidance on the fundamental goals of curriculum, instruction, and academic standards. The Teaching and Learning Office will support students, families, educators, schools, and districts through coaching, professional learning, and resources.” While the Assessment Office has former educators with expertise in content standards their primary job responsibility is overseeing the administration of assessments. The Office of Teaching and Learning has the necessary content expertise on which the assessments are based and is equipped to provide feedback to ADAM as well as the support necessary for schools in need.

Immediate alignment of Assessment and Accountability under the Office of Teaching and Learning, however, will be significantly inhibited in the coming year to 18 months as NDE is undertaking a project to overhaul and replace the existing data infrastructure with one that is highly consolidated and automated through a statewide data management system. Should NDE act on additional IT related recommendations, additional changes will include establishment of an enterprise data management framework of which only small fragments currently exist, the update or development of a technology action plan to build a strong support structure agency wide, a return on investment (ROI) engine finely tuned with documentation and compliance standards that extend into all Divisions and throughout all systems, and re-solicitation of a statewide student information system that is responsive to needs and eliminates redundancies. ADAM’s systems and processes will be significantly impacted, and too much change in a compressed timeframe can be more detrimental than beneficial to NDE’s long-term efficiency.

RECOMMENDATION 3-10:

Temporarily move the Office of Assessment, Data, and Accountability Management under the Office of Information Systems during the implementation of the envisioned Data Management System; once that system is operational the academic (non-technical) operation of Assessment and Accountability should be transitioned under Teaching and Learning to more closely align Curriculum, Instruction, and Assessment and close the feedback loop in the process.

ADAM would continue to be in close alignment with Teaching and Learning as part of the Future Ready Student Division (currently called the Student Achievement Division); however, ADAM would no longer report directly to that Deputy. Instead, ADAM staff would directly report to the Office of Information Systems (a new department being recommended in **Section 6** of this report) and indirectly report to the

Office of Teaching and Learning. Prioritizing alignment to the relevant standards ensures there is not a disconnect between what is being taught and what is being assessed.

A more detailed explanation of the reporting structure can be found in **Section 1** of this report which discusses Public Works' overall reorganization recommendations.

This recommendation from the technology side is discussed in greater detail in **Section 6** of this report. However, the following should be taken into consideration before making any changes to the current structure of the ADAM office:

- Begin planning for a transition of *Assessment & Accountability* responsibilities to the instructional side of NDE.
- Content experts and management on the instructional side can be assigned to *Assessment & Accountability* as a first step toward a transition as they begin to learn the content needs - with the information technology team remaining as the major process owners.
- As the scope of the new Data Management System becomes more clearly defined, the business and process owners will know what to expect for future automation of manual processes and division of responsibilities
- When the current assessment and accountability systems are more consolidated and automated, a complete shift to the content experts and management will have a higher probability of acceptance and success.

In addition, as systems and processes are being redesigned, the leadership will need to consider how to ensure a more continuous information flow and feedback to ensure the triangulation of curriculum, instruction, and assessment.

FISCAL IMPACT

This recommendation can be accomplished with existing resources.

Office of Accountability

According to the NDE web page, the mission of the Office of Accountability is to “serve the public by providing accurate, useful, honest, and on-time education data.” A valid and reliable accountability system is the foundation for all school and district-related data reporting and generates all data reports required by state and federal law. As a repository for meaningful and actionable data, the accountability system provides accurate, useful, honest, and on-time data and assists in rigorous analysis to identify whether schools and districts are improving and are preparing students for success in college and career. The system tracks student learning progress, is essential to monitoring school quality, informs instructional practices, and is helpful to parents in informing school selection.

The Office of Accountability is led by an Accountability Supervisor and includes five Education Programs Professionals (EPP) and one Program Officer II (PO II). The major responsibilities as reported by each EPP and the PO II are outlined below to provide an understanding of their major duties:

- EPP #1—oversess Assessment Logistics, administration, and training for ACT and Smarter. Customer and vendor support

- EPP #2—oversees Assessment Logistics, test design, administration, and training for Smarter, Science, NAA, and WIDA.
- EPP #3—focuses on mandatory state and federal test security laws and guidance to ensure test validity and reliability. Complies with legislative reporting mandates on test security.
- EPP #4—oversees the Nevada Report Card, the accountability portal, and graduation rates.
- EPP #5—coordinates NAEP and serves as the contact of assessment and accountability.
- EPP #6—provides support to the team, handles emails and keeps a “paper trail.”

Assuming that all positions are filled, Public Works determined that the office is adequately and appropriately staffed.

FINDING

NDE has multiple accountability systems that are mandated in state and federal laws; however, these systems often overlap and create confusion and additional work for LEA staff.

ADAM provides major oversight for the following accountability systems which are required by Nevada Statutes:

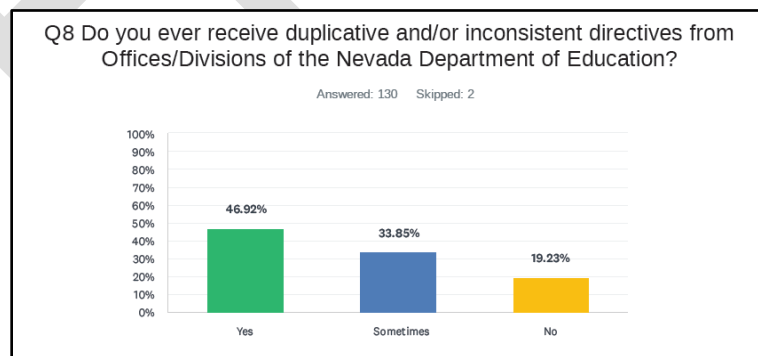
- **Nevada Report Card**—serves as a vital state and federally mandated reporting platform which ensures transparency and accountability in Nevada’s public education system. It is mandated by both Nevada Revised Statute (NRS) 385A 070 and Title I of The Elementary and Secondary Education Act of 1965 (ESEA), which was amended by Every Student Succeeds Act (ESSA). It also serves as an important resource for parents and other stakeholders.
- **Nevada School Performance Framework (NSPF)**—is Nevada’s public-school rating system designed by Nevadans for Nevada public schools and developed in accordance with the federal Student Succeeds Act (ESSA) and established by NRS 385A 600. The system is used to classify schools with a five-star performance rating system. NSPF was designed to ensure that the statewide system of accountability for public schools complies with all requirements for the receipt of federal money under ESEA. The statewide system of accountability applies to all public schools and includes annual ratings for each school based on the performance of the school and whether each school meets the annual measurable objectives and performance targets in the system. The system includes consequences, rewards, and support based on the ratings, and it is designed to direct available state money to public schools receiving one of the two lowest ratings of performance. Each measure in the school rating system is disaggregated by race/ethnicity and special population membership and reported on the school rating report. Reports are issued annually and each of these measures aligns directly to federal accountability standards.
- **The Alternative Performance Framework (APF)**—was established to highlight schools who serve high needs populations and who may have insufficient data for an annual rating in the NSPF. The APF meets the ESSA requirement that all schools should be rated. Examples of these schools include juvenile detention facilities, schools serving students with disabilities, credit recovery, or behavioral programs.

- Acing Accountability**—In 2023, the Governor committed \$2.6B billion in increased funding for K-12 Education in Nevada.⁶⁵ 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?

As shown, each system has sperate rules and requirements. The guidance provided to the LEAs for each system contain overlaps in data requests and reporting requirements, and do not appear to be aligned with the other accountability systems in place.

Exhibit 3-15 shows the LEAs’ responses to a question regarding duplicative or inconsistent directives of NDE. As shown the responses were overall negative. The LEAs’ open-ended comments to this question cited concerns with ADAM and the accountability systems in particular, noting that this is an area where more consistent guidance was needed.

EXHIBIT 3-15 LEA SURVEY RESPONSES– QUESTION 8



Source: Public Works LEA Survey, October 2024.

⁶⁵ https://gov.nv.gov/Newsroom/PRs/2023/2023-09-21_education/, 2024.

In the opening remarks to the June 2024 Preliminary Report, The Nevada Commission on Innovation and Excellence in Education (CIEE) made the following observation following a full year of study:

*We have also seen all the ways that the system as it is currently designed is holding us back. Well-intentioned policies are sometimes outdated, other times misaligned, and too often misunderstood or poorly implemented. Our student learning outcomes are middling within the United States and lagging significantly behind global top performers. We lead the nation in our shortage of qualified educators. Many of our students are disengaged, contributing to chronic absenteeism, and parents are turning away from public schools. Employers and businesses report that their newest employees arrive with few of the skills needed to thrive in modern workplaces. **This is not the fault of students, educators, parents, or policymakers.** It is the inevitable result of an outdated and inflexible system designed for a bygone era.*

Best practices indicate that state accountability systems should be designed to assess and monitor the performance of educational institutions to meet established standards of excellence. One of the main purposes of an accountability system is to ensure that students are receiving high-quality education, that resources are being allocated effectively, and that improvement efforts are aligned with student needs. Best practices show that some critical and common elements of a state accountability systems include:

1. **Clear Standards and Expectations:** The system must define clear academic and non-academic goals, such as proficiency in subjects like math, reading, science, and social studies, as well as behavioral or developmental outcomes. These standards provide benchmarks for assessing student progress.
2. **Assessment Tools:** High-quality, standardized assessments are a key component. These assessments are typically used to measure student learning outcomes and evaluate individual schools, districts, and sometimes entire states. These may include state standardized tests, end-of-course exams, or assessments aligned with college and career readiness.
3. **Performance Indicators:** Common indicators (e.g., test scores, graduation rates, college readiness, attendance, and discipline data) are used to evaluate school and district performance. These metrics can also include student growth measures, which track improvement over time.
4. **Student Subgroup Analysis:** Accountability systems must ensure fairness by disaggregating performance data across various student subgroups, such as racial/ethnic groups, students with disabilities, English language learners, economically disadvantaged students, and others. This helps identify achievement gaps and focuses improvement efforts on closing them.
5. **Progress and Growth Measures:** In addition to assessing proficiency, it's important to measure student progress or growth, particularly for students who may not yet be at grade level. Growth measures reflect improvements made by students over time, not just absolute achievement levels.
6. **School and District Reporting:** A transparent and clear reporting on the performance of schools and districts is essential. This allows parents, educators, policymakers, and the public to understand how schools are performing and where improvements are needed.
7. **Incentives and Consequences:** A state accountability system often includes rewards for high-performing schools and districts. Rewards might include additional funding and/or public

recognition. Consequences for underperformance might include additional support, intervention, corrective action, or even closures for chronically low-performing schools.

8. **Support and Intervention:** For schools that fail to meet performance goals, states often provide additional support and resources aimed at improving performance. This support can include targeted professional development, instructional coaching, funding, or even restructuring efforts.
9. **Continuous Improvement Process:** An effective system emphasizes ongoing improvement rather than just punitive measures. This could involve providing opportunities for schools to refine practices, adopt new instructional strategies, or implement community engagement initiatives.
10. **Stakeholder Engagement:** Engagement of educators, parents, students, and the community is crucial in developing and refining the accountability system. This ensures that the system is relevant, balanced, and supportive of both teachers and students.
11. **Data Use and Transparency:** The ability to collect, analyze, and use data effectively is key to an accountability system's success. The system should ensure that data are available, understandable, and used to inform decisions at all levels—from classroom instruction to state policy
12. **Flexibility and Adaptability:** As education systems evolve, the system should allow for adjustments over time, as new research or innovations emerge. This ensures that the accountability framework remains relevant and effective in meeting the needs of students and educators.

These elements in a strong system should work together to create an accountability framework that promotes educational quality, fairness, and continuous improvement.

The following is a quick summary of assessments and accountability systems in peer states: Arkansas, Utah, Kentucky, Oregon, and Tennessee.

Arkansas: The Office of Public-School Accountability provides support and guidance to districts with respect to state and federal laws, rules, and regulations. The foremost obligation of the Office of Public-School Accountability shall be to administer all monitoring and compliance activities dealing with academic and fiscal accountability for each school or district and to report academic progress (Ark Code Ann § 6-15-102). The office includes the following units:⁶⁶

- Arkansas Public School Computer Network Student Application
- Assessment
- School Performance and Monitoring
- Standards and Systems Support

Utah: In the Summer of 2021, the Utah State Board of Education engaged in work to consider changes to the school accountability system. USBE convened an Assessment Strategic Plan Work Group (the Work Group) comprising key education stakeholders in Utah. USBE employed the National Center for the

⁶⁶ <https://dese.ade.arkansas.gov>, 2024.

Improvement of Educational Assessment (Center for Assessment), a non-profit, non-partisan consulting firm, to facilitate the Work Group and provide assessment expertise throughout the process.

The overarching goal of this work is to create a school accountability system that is more aligned with Personalized, Competency-Based Learning practices, and Utah's Portrait of a Graduate competencies while maintaining an easy to compare, simple, and transparent school accountability system. Included in this work is a consideration of an accountability system that is balanced and holistic to the nature of learning, drives improvements, and stimulates local accountability efforts.⁶⁷

Kentucky: This accountability system has students at its center—ensuring they are well-rounded, postsecondary ready, and prepared with knowledge, skills, and essential dispositions to successfully pursue the pathway of their choice after graduating from high school. The system has several key goals:

- Promote higher levels of student learning and achievement.
- Reduce achievement gaps and ensure fairness.
- Build a culture of high expectations and continuous improvement.
- Communicate a clear and honest understanding of strengths and areas for improvement in schools and districts.

Results are reported in an online School Report Card including disaggregation of individual student group data and include reported-only measures. Individual student reports are issued to parents/guardians. Kentucky's Accountability System (KRS 158 6455) establishes an accountability system that includes an annual meaningful differentiation of all public schools in the state using multiple measures that describe the overall performance of each district, school and student demographic group.⁶⁸

Oregon: "Reimagining Oregon's Accountability System" is a priority of the DOE agency director. In collaboration with the Governor, they are working together to engage Oregonians in the following questions to support the development of a new framework for accountability in Oregon:

- What does a truly excellent educational experience look like for Oregon students now and over the next decade?
- Are school leaders and policy makers aligned to the right goals?
- How do we know if Oregon's schools are successful in these endeavors?
- How does ODE best support working toward that success?

These important questions, and ones like them, have been raised by Oregon families, educators, students, school leaders, tribes, business leaders, and policy makers.⁶⁹

Tennessee: The State Report Card is an important tool for families, educators, communities, and elected officials to understand how our schools and districts are serving all our students. To get a more complete picture, one is encouraged to explore the data for each performance indicator, visit schools, talk to educators, parents and families, and students, and review school or district websites. With this

⁶⁷ <https://schools.utah.gov>, 2024.

⁶⁸ <https://www.education.ky.gov/>, 2024.

⁶⁹ <https://www.oregon.gov>, 2024.

knowledge, the Tennessee DOE can continue to build on Tennessee's Best for All strategic plan that, together as a state, sets all students on a path to success.⁷⁰

Although there are similarities in what each state refers to as an accountability system, the differences lie in not only how systems are used, but how the DOEs support the LEAs. This includes not only assessments and ratings for schools but also ensuring that students are well prepared as they navigate the K-12 school system.

The NDE has three accountability systems and a state report card. The Nevada School Performance Framework (SPF) and the Acing System share common elements as they both focus on measuring and improving educational outcomes, but each system has its specific structure and focus areas. Both systems are designed to provide a comprehensive look at how schools are performing, using data-driven approaches to identify areas for improvement and ensure students receive a quality education. Looking at these two systems to identify the common elements would be a first step to unifying NDE's accountability system.

Additionally, the Nevada Alternative Performance Framework (APF) is designed to evaluate and improve educational outcomes for schools that serve unique student populations or face other challenges, such as small student numbers or special education needs. The main accountability measures in the APF focus on:

1. Academic Achievement
2. Attendance
3. Academic progress
4. Graduation
5. Student Engagement
6. Planning for Success

Although not an official "accountability system" the Nevada Report Card provides a snapshot of the performance and quality of education in the schools.

The report card is not based on NSPF data only. The Nevada Report Card is a comprehensive reporting platform that goes beyond simply presenting NSPF data. In accordance with federal requirements (ESSA) and state law (NRS), the Report Card provides a wide range of information about public schools including information about public schools related to a wide variety of student and school performance metrics, accountability, per-pupil expenditures, and educator qualifications, as well as any other information that Nevada state law requires. Essentially, the Nevada Report Card serves as a central hub for accessing a variety of important information about public schools in the state.

The main elements of the report card include:

1. Student Achievement, ELA and Math
2. Growth
3. College and career Readiness
4. Student Engagement (attendance, behavior, climate)
5. Equity
6. Teacher Quality
7. Graduation Rate

⁷⁰ <https://www.tn.gov>, 2024.

Interviews, focus groups, and survey results with district staff indicate they are in favor of the NDE having one robust system of accountability. They state that when multiple systems are in place, their staff and organizations may be unclear about which system takes precedence which can lead to conflicting priorities and duplicated efforts. Additionally, systems can create additional paperwork, reporting requirements, and procedures, increasing the administrative burden on staff. They strongly recommend alignment among NSPF, Acing, and the Alternative system and identify indicators that overlap and might be eliminated.

The presence of multiple accountability systems can undermine organizational efficiency, employee satisfaction, and long-term success if not properly managed or integrated. Interviews with district administrators suggest that Portrait of a Learner should be the basis for any revised accountability system. Administrators believe that a system should be based on student voice and can be instrumental in ensuring quality teaching practices. There was overwhelming support of the Portrait of a Learner Initiative by district staff interviewed.

The Nevada Commission on Innovation and Excellence in Education (CIEE) cites several points regarding the possible use of Nevada's Portrait of a Learner which represents a collective effort to create a vision of the essential mindsets, skills/standards, and attributes that young people in Nevada should develop.⁷¹

The CIEE report further states: *The Nevada Portrait is structured as a series of questions that invite Nevada's learners to reflect on their learning journeys, consider how to bring meaning to the skills they have acquired, and ultimately to lead prosperous careers and lives. It incorporates future-ready skills, like critical thinking, collaboration, resilience, and communication, that are essential skills. The Nevada Portrait is structured as a series of questions that invite for the world of work.*

The Portrait of a Learner creates a unified vision for all students across the state. It is a bold step forward toward achieving the NDE's leadership's vision. Next steps include designing competency continuums for the skills/standards outlined in the Portrait, designing an approach to evaluating competency development, and continuing to ramp up efforts to socialize the Portrait itself with stakeholders across Nevada.

RECOMMENDATION 3-11:

Establish one robust statewide system of accountability.

Merging the current accountability systems into one comprehensive accountability system will require Legislative and USDE approval which will require working collaboratively with the CIEE to study and develop final plans and revised legislation.

There are several steps to consider when planning to establish or revise an accountability system. The major steps include:

1. Identify the "why." Describe why this task is being undertaken by defining the objectives and the scope of the work. This step is first and foremost to establish the setting and importance of the work.

⁷¹ https://webapp-strapi-paas-prod-nde-001.azurewebsites.net/uploads/preliminary_report_the_nv_ciee_06_27_24_45d8926ef7.pdf, 2024.

2. Determine the stakeholders who will be involved, including not only school and district representatives, but also parents and business and community partners.
3. Establish clear standards, performance standards, and expectations.
4. Identify the critical and most important elements in each of the existing accountability systems.
5. Determine if current assessment and evaluation tools are aligned to the revised performance standards.
6. Determine accountability measures which include timelines for assessments, identification of and consequences for under performing schools, and outline incentives for higher performing schools.
7. Develop or revise a rating or scoring system.
8. Provide the necessary training and professional development.
9. Piloting the new system.
10. Make improvements and adjustments, as needed.

FISCAL IMPACT

NDE should consider hiring an experienced consultant to assist in the planning, facilitation, and creation of one accountability system. Although the cost cannot be determined at this time, a \$200,000 estimate is being used for planning purposes.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30	TOTAL
Establish one robust statewide system of accountability	(\$40,000)	(\$40,000)	(\$40,000)	(\$40,000)	(\$40,000)	(\$200,000)

Office of Assessment

The Office of Assessment oversees the Nevada State Assessment System which ensures all public-school students, no matter where they attend public school, receive a quality education. In alignment with both federal and state education laws, the academic standards and assessments were adopted by the Board of Education and State Legislature to effectively prepare and assess students' readiness for success in a global 21st century.

The Office of Assessment is led by a Supervisor who in turn supervises two Education Programs Professionals (EPP), a Programs Officer I, and a Program Officer II. The tenures of the five staff in the Office of Assessment range from three months to seven years as of October 2024.

The major responsibilities, as reported during interviews with each staff member are summarized below to provide an understanding of their primary duties:

- EPP 1—oversees state testing, state report card, and the Star ratings.
- EPP 2—coordinates and plans for all assessments.
- Program Officer I—supports the team, handles emails, collects district information and keeps a paper trail.

- Program Officer II—focuses on compliance with state laws for reporting to the legislative council.

Based on the Public Works assessment of staffing levels in the Office of Assessment, and assuming all positions are filled, the office appears to be adequately staffed.

Overview of NDE Assessments

In 2019, an “Independent Evaluation of Nevada’s Statewide Assessment System” was conducted by WestEd. **Exhibit 3-16** shows the Executive Summary of the report that outlines the assessments required and administered by the state. These assessments are listed in alphabetical order and include grade levels tested and the testing schedule.

EXHIBIT 3-16
STUDENT ASSESSMENTS REQUIRED AND ADMINISTERED BY NDE

ASSESSMENTS	GRADES	SCHEDULE
American College Test (ACT)	11 th	Feb 2025 April 18 & 22, 2025 Make-Up dates
Career and Technology Education (CTE)	9-12	Feb 10-Mar 24 April 14-25
Measures of Academic Progress (MAP)	K-3	Various testing windows
National Assessment of Educational Progress (NAEP)	4 and 8	Selected students from selected schools
Science	5, 8 and HS	
Smarter Balanced Assessment Consortium (SBAC)	3-8	March 11 - May 6
WIDA* assessments for ELLs *WIDA is the acronym for Wisconsin, Delaware, and Arkansas, the original states involved with the grant used to fund the development of this assessment	K 1-12	Jan 6 – Feb 28 Jan 13 – Feb 28

Source: Independent Evaluation of Nevada’s Statewide Assessment System, WestEd, Jan 16, 2019.

Since the WestEd report, the Nevada Alternative Assessment was added which impacts less than one percent of students, as it is used for those students with cognitive disabilities.

The WestEd report also provided six key findings summarized as follows:

1. Overall high marks on training, technical assistance, and resources provided to support statewide assessment and data use.
2. NV educators expressed a need for more efficient state testing, improved assessment tools, and strategies to support instruction.
3. District test directors reported mixed perceptions about the usefulness of specific statewide assessments and confusion related to state testing requirements.
4. Statewide assessments are implemented with high levels of fidelity, but improvements are needed to report results more quickly.

5. District test directors reported mixed perceptions about the usefulness of the SBAC interim assessments.
6. NDE received overall high marks for support provided to districts; however, district test directors reported occasional gaps in NDE communication to districts regarding:
 - a. new assessment and accountability requirements;
 - b. assessment administration guidance; and
 - c. general assessment support.

FINDING

The number and type of student assessments required and administered by NDE comply with ESSA (Every Student Succeeds Act) and NRS (Nevada Revised Statutes) requirements for measuring student achievement and proficiency of the Nevada State Academic Content Standards, but are not currently in direct alignment with the Portrait of a Learner ideals and the personalized competency-based learning environment envisioned for the state.

In September 2022, education stakeholders in Nevada undertook a planning process to develop an action plan based on the state's opportunity analysis to grow personalized, competency-based learning in the state. The Nevada Phased Action Plan focused on creating engaging learning experiences customized to each student's strengths, needs, and interests. Student progress is based on evidence of mastery or competency, not seat time. Key recommendations relating to the local and statewide assessments are as follows:

- Examine the quality and use of local assessments, including ways they are or could be used to support personalized learning.
- Study the ways other states design and use balanced assessment systems, particularly ones that are focused on personalized and competency-based learning environments.

The preliminary report issued by CIEE in June 2024 reiterates this theme as part of the overall recommendations for revamping the current Nevada Accountability System. The report recommends innovative approaches for assessing student progress, particularly the use of dashboards containing real-time performance data.

While the WestEd report contained valid information on the assessment process and environment, if a more competency-based approach to education is envisioned, the traditional testing approach has limitations. The disconnect between these envisioned Nevada education system innovations and the traditional assessment systems has the potential to inhibit progress when the testing environment is not aligned to the desired learning environment.

RECOMMENDATION 3-12:

Conduct a review of and modify the current traditional assessment approach to align with the creation of a single robust accountability system.

In the process of developing a single robust accountability system, the assessments and associated progress monitoring activities must be made part of the discussions. Potentially, this may require approval by the USDE and state legislators, therefore engaging CIEE and Technical Accountability representatives and other stakeholders in this process will be critical.

FISCAL IMPACT

This cost of this recommendation is considered as part of the overall recommendation to implement a single robust accountability system for the state.

OFFICE OF INFORMATION TECHNOLOGY

The Office of Information Technology (OIT) is responsible for data collection, verification, and reporting. The primary responsibility is for the Student Accountability Information Network (SAIN) which consists of many systems working together to create the Department of Education's data model. The Data Systems unit also maintains the Prek-12 longitudinal database. The effectiveness and efficiencies of the Office of Information Technology is addressed in **Section 6** of this report. Although NDE leadership requested OIT findings and recommendations be placed in this division section, our team believes that technology crosses all divisions at NDE. Therefore, it is in a standalone section (**Section 6**), even though the office currently reports to the Deputy Superintendent of the Student Achievement Division.

OFFICE OF INCLUSIVE EDUCATION

Overview

The Office of Inclusive Education (OIE) is one of five offices in the Student Achievement Division (SAD). OIE supports special education (SPED, supporting students with disabilities), gifted and talented education (GATE), and Indian Education. Though much of the Office's work focuses on SPED, it is important to recognize throughout this chapter that Inclusive Education supports all three distinct areas: SPED, GATE, and Indian Education.

OIE provides oversight of federal and state programs and policies including the Individuals with Disabilities Education Act (IDEA) and provides resources for programs such as early childhood, special education, autism, and dyslexia. OIE is committed to ensuring that ALL students in Nevada are college- and career-ready upon exit from the public school system. Through its responsibility to provide general supervision over the implementation of federal and state regulations, OIE builds upon collaborative efforts with state and local partners and stakeholders to raise expectations and improve early childhood, educational, and employment outcomes for all students with disabilities, their families, and their communities.

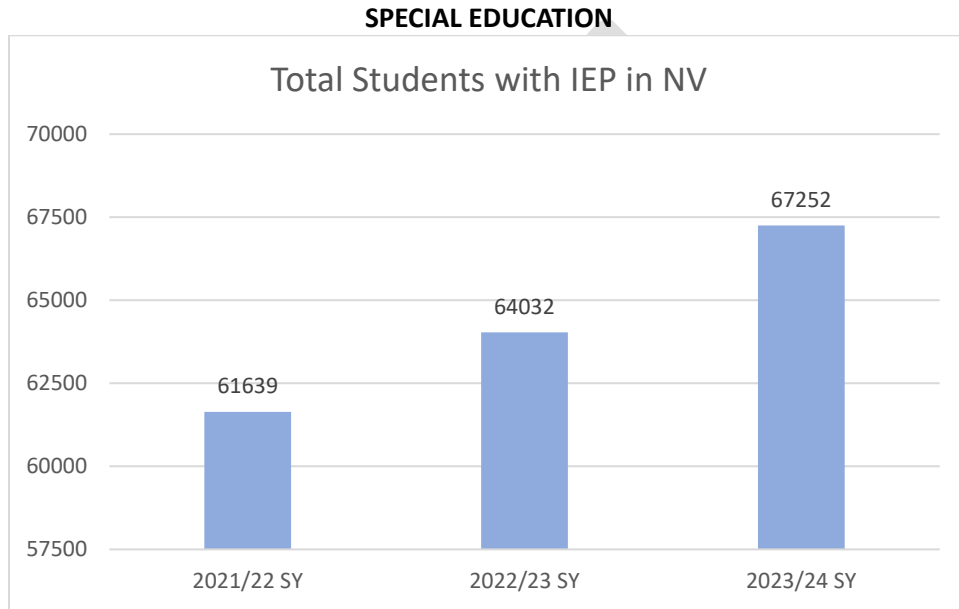
Indian Education provides technical assistance and direction to school districts and schools in the unique needs of American Indian (AI) students. Indian Education also collaborates with tribes and organizations throughout Nevada to ensure educational programs are in place for AI students.

The GATE Program provides technical assistance to local education agencies relating to the identification and education of gifted learners. The Nevada Revised Statutes defines a gifted pupil as "a person under the age of 18 years who demonstrates such outstanding academic skills or aptitudes that the person cannot progress effectively in a regular school program and therefore needs special instruction or special services" ([NRS 388.5251](#)). The Nevada Administrative Code further states that a gifted and talented person "possesses or demonstrates outstanding ability in one or more of the following: general intelligence, academic aptitude in a specific area, creative thinking, productive thinking, leadership, the visual arts, or the performing arts" ([NAC 388.043](#)).

The Office of Inclusion served more than 70,000 students across Nevada in 2023-24, with overall numbers increasing over the last two years, as indicated by **Exhibits 3-17** through **3-19** below showing the number of students served by each program.

As shown in **Exhibit 3-17**, the number of students with an IEP in Nevada increased by 5,613 students, an increase of 9.1 percent, between the 2021-22 School Year (SY) and the 2023-24 SY.

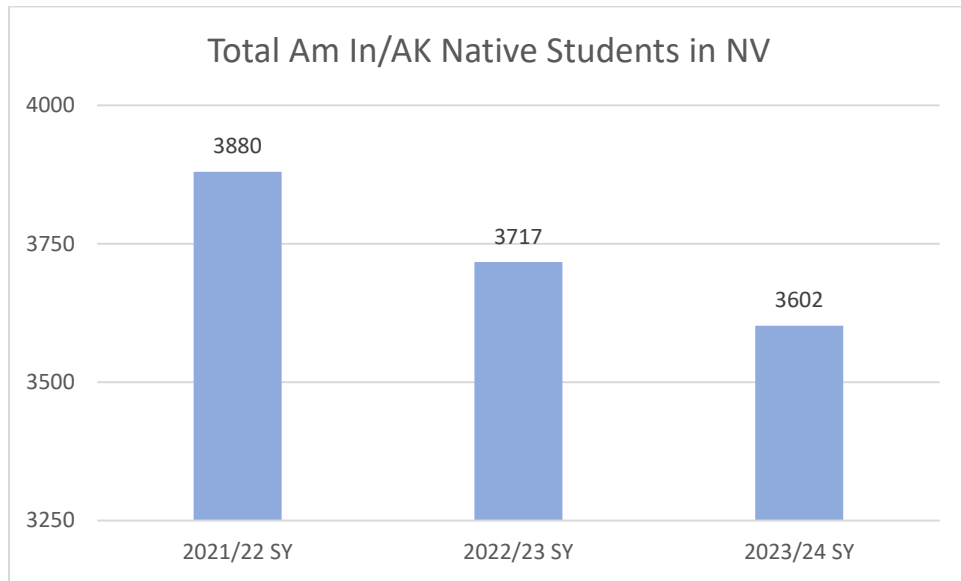
EXHIBIT 3-17
NUMBERS OF STUDENTS WITH AN IEP IN NEVADA
2021/22 THROUGH 2023/24 SY



Source: NDE Office of Inclusive Education, November 2024.

Exhibit 3-18 shows the number of American Indian/Alaska Native (Am In/AK) students served in Nevada. As shown, the numbers declined slightly from 2021-22 SY to 2023-24 SY.

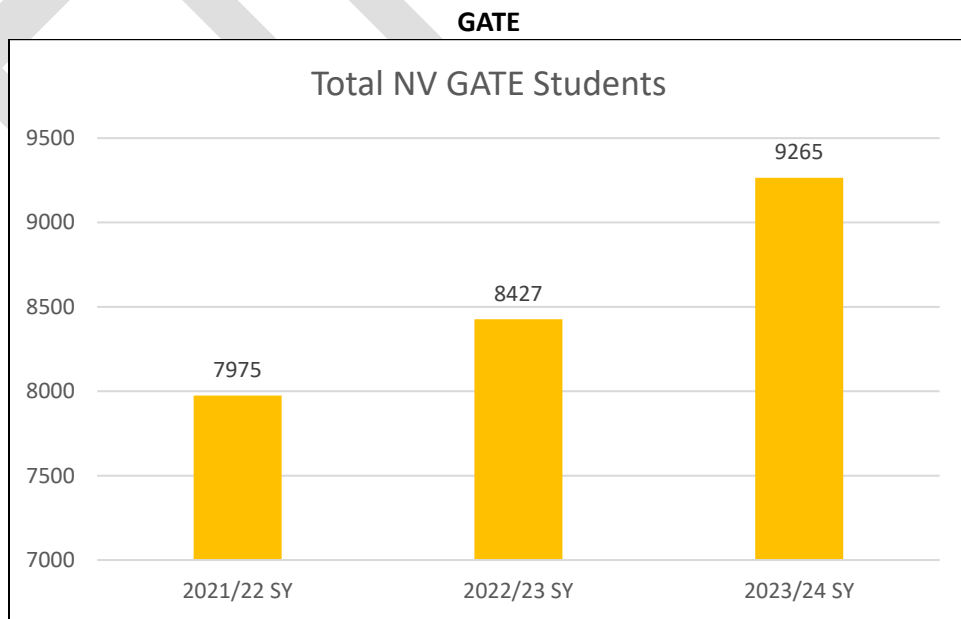
EXHIBIT 3-18
NUMBERS OF AM IN/AK STUDENTS SERVED
2021/22 THROUGH 2023/24 SY



Source: NDE Office of Inclusive Education, November 2024.

Exhibit 3-19 shows the numbers of GATE students served, increasing significantly by 1,290 students, an increase of 16.2 percent from 2021-22 SY through 2023-24 SY.

EXHIBIT 3-19
NUMBERS OF GATE STUDENTS SERVED
2021/22 THROUGH 2023/24 SY

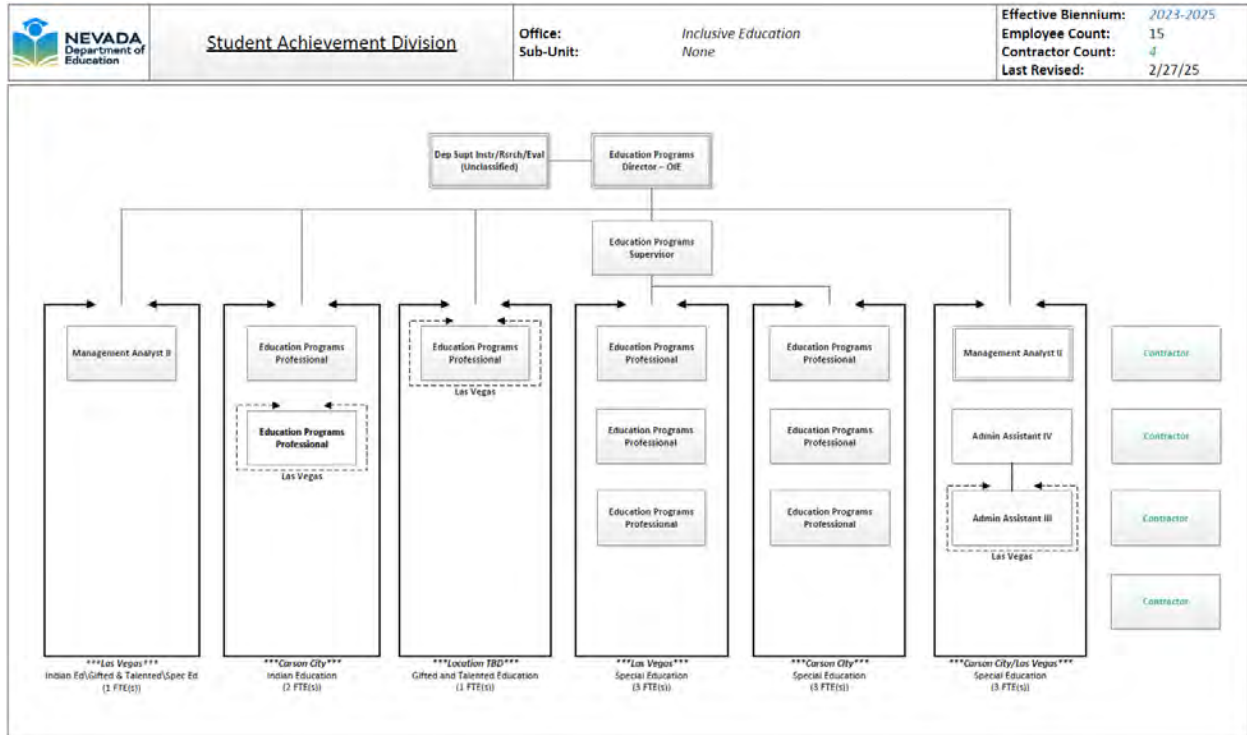


Source: NDE Office of Inclusive Education, November 2024.

Organization and Management

The Office of Inclusive Education includes staff dedicated to Special Education, Indian Education, and Gifted and Talented Education, as well as staff providing direction or support across all three of these areas. **Exhibit 3-20** shows the current organizational structure reflecting this staffing. As shown, 14 full-time staff are under the guidance of the Office's Education Program Director (EPD). The Office EPD reports to the Deputy Superintendent over the Student Achievement Division.

EXHIBIT 3-20
INCLUSIVE EDUCATION ORGANIZATIONAL STRUCTURE



Source: Nevada Department of Education, February 2025.

The Office of Inclusive Education includes 15 full-time staff, as shown in **Exhibit 3-21** below.

EXHIBIT 3-21
OFFICE OF INCLUSIVE EDUCATION STAFFING

Office or Program Role	Positions Filled	Positions Vacant	Total Positions
OIE Management and Support	4	0	4
Education Programs Director	1		1
Education Programs Supervisor	1		1
Management Analyst II	1		1
Admin Assistant III	1		1
Special Education	7	1	8
Education Programs Professional	5	1	6
Management Analyst II	1		1
Admin Assistant IV	1		1

Efficiency Assessment for the Nevada Department of Education

Office or Program Role	Positions Filled	Positions Vacant	Total Positions
Indian Education	2	0	2
Education Programs Professional	2		2
Gifted and Talented Education	1	0	1
Education Programs Professional	1		1
Total	14	1	15

Source: Compiled by Public Works from Office Level Organization Chart, October 2024.

Note that the numbers for individual roles in the chart roll up to the four higher-level headings shown in bold (OIE Management and Support, Special Education, Indian Education, and Gifted and Talented Education). Thus, the total sum of positions for the Office can be derived from adding the numbers in bold.

As of November 2024, OIE staffing also includes two contractors who are dedicated to Indian Education.

As illustrated in **Exhibit 3-22**, the budget for OIE is under Budget Code 2715. The budgets below are for the biennium of FYs 24 and 25.

EXHIBIT 3-22 BUDGET INFORMATION FOR THE OFFICE OF INCLUSIVE EDUCATION

2715	Category	Tot FY 2024	Tot FY 2025
1	PERSONNEL	\$1,576,921	\$1,864,084
2	OUT-OF-STATE TRAVEL	\$17,897	\$17,897
3	IN-STATE TRAVEL	\$45,265	\$45,265
4	OPERATING EXPENSES	\$119,598	\$119,823
5	EQUIPMENT	\$13,824	\$0
12	INDIRECT COSTS	\$167,616	\$176,413
13	SPECIAL ED ADMIN 84.027	\$1,395,932	\$1,325,527
14	SPECIAL ED - ATS 84.027	\$117,860,389	\$103,482,682
15	EARLY CHILDHOOD - ADMIN 84.173	\$167,760	\$205,658
16	EARLY CHILDHOOD - ATS 84.173	\$3,808,543	\$4,078,790
17	SPECIAL ED – CONTRACTS	\$1,726,993	\$1,697,854
20	FED SPDG ADMIN 84.323	\$197,376	\$153,248
21	FED SPDG AID 84.323	\$1,181,240	\$1,141,844
26	INFORMATION SERVICES	\$21,037	\$14,128
33	GIFTED AND TALENTED EDUCATION ADMIN	\$5,655	\$5,655
41	NV TRIP ADMIN 84.421E	\$2,487,908	\$2,461,249
42	NV TRIP AID 84.421E	\$7,409,213	\$7,292,936
58	COMPUTER EQUIPMENT SB500	\$2,404	\$164
67	INDIAN EDUCATION ATS 84.299	\$946,855	\$756,426
68	INDIAN EDUCATION ADMIN 84.299	\$30,469	\$552,500
82	DEPARTMENT COST ALLOCATION	\$3,784	\$3,784
87	PURCHASING ASSESSMENT	\$2,343	\$2,343
88	STATEWIDE COST ALLOCATION PLAN	\$33,304	\$33,102
93	RESERVE FOR REVERSION TO GENERAL FUND	\$156,172	\$0
	TOTAL	\$139,378,498	\$125,431,372

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

Nevada General Supervision System

The Nevada General Supervision System (NVGSS) is the Nevada Department of Education's approach for monitoring, documenting, and enforcing accountability of the implementation of the Individuals with Disabilities Education Act (IDEA) and the Nevada Administrative Code (NAC). The NVGSS ensures continuous improvement, resulting in improved educational and functional outcomes for all students with disabilities ages 3 through 21, and that each Local Education Agency (LEA) responsible for educating students with disabilities meets IDEA and NAC special education program requirements.

The NVGSS contains eight components, which together comprise an integrated system for general supervision of special education. These eight components are shown in **Exhibit 3-23** below:

EXHIBIT 3-23
NVGSS COMPONENTS



Source: <https://doe.nv.gov/offices/inclusive-education/>, 2024.

Overviews of each of the eight system components are provided below, together with OIE goals for each component to provide insight into how the work of OIE aligns with NVGSS:

- State Performance Plans (SPP) and Annual Performance Reports (APR)
 - The SPP/APR measures state and local progress on 18 specific compliance and performance indicators. The SPP/APR serves as the primary accountability mechanism for the state of Nevada and its LEAs in the implementation of their general supervision system.
 - Goal: Improve Nevada's state determination by enhancing Nevada's data collection and reporting system to ensure that we are collecting and reporting accurate and valid data to ensure that we maximize the score Nevada receives to meet the requirement and purposes of IDEA.
- Data Systems
 - Data processes and results are used for decision making about program management and continuous improvement efforts.

- Goal: To support districts in using data collected within ACCESS Nevada to collect, report, and analyze data to make data-based decisions about special education related programs to improve student outcomes.
- Policies and Procedures
 - Nevada's policies and procedures are principally established through the Nevada Administrative Code (NAC), and effective implementation of the requirements of the NAC support implementation of the Individuals with Disabilities Education Act (IDEA).
 - Goal: To establish a comprehensive, user-friendly, and compliant framework of internal and external policies and procedures for special education, ensuring clarity, accessibility, and alignment with IDEA and state regulations. This framework will empower staff, families, and students with disabilities to effectively navigate special education processes and achieve positive outcomes.
- Integrated Monitoring
 - Integrated monitoring activities are selected to ensure continuous examination of performance, compliance, and results.
 - Goal: To establish a comprehensive and data-driven system for integrated monitoring of special education programs, ensuring compliance with IDEA regulations, alignment with student needs, and continuous improvement in student outcomes for all students with disabilities.
- Fiscal Management
 - Fiscal management and accountability for every student with a disability age 3 through 21 includes a review of fiscal resources to ensure funds are being used in accordance with federal and state requirements.
 - Note: ePAGE (Electronic Plans, Applications, Grants, and Expenditures) is a web-based tool designed to help manage our federal grants. The online system included processes to help LEAs manage their federal funding applications, grant requests, grant submissions, amendments/revisions, and final financial reports. LEA grant applications are monitored by the state for approval.
 - Goal: To foster transparency and accountability in the use of Part B set-aside funds for special education by establishing a readily accessible, user-friendly information system that clearly demonstrates how these funds are allocated and utilized to improve student outcomes for all students with disabilities.
- Sustaining Compliance and Improvement
 - Compliance and improvement activities are intended to improve educational results and functional outcomes by providing for the correction of noncompliance and the investment in improvement activities.
 - Note: School District Annual Performance Reports - Used as a tool for targeted supports and improvements, the District Annual Performance Reports show how school districts performed on specific indicators and whether or not the district met the state's annual targets for those indicators as defined in the Nevada State Performance Plan.

- Goal: To establish a systematic and collaborative framework for continuous improvement and compliance with IDEA and state regulations, ensuring all students with disabilities receive a free, appropriate public education (FAPE) in the least restrictive environment (LRE).
- Dispute Resolution
 - The sections in NAC Chapter 388 for due process hearings and appeal from the decision of the Hearing Officer can be found in NAC §388.306 to 388.315. The sections in NRS Chapter 388 for due process hearings and appeal from the decision of the Hearing Officer can be found in NRS §388.463 to 388.469.
 - Goal: To maintain a consistently effective and IDEA-compliant complaint dispute resolution system that fosters timely and fair resolutions, upholds the rights of parents and students with disabilities, and strengthens positive outcomes for all involved.
- Technical Assistance and Professional Development
 - Targeted technical assistance and professional development are directly connected to the SPP/APR and can vary from universal to direct support and intervention, depending on an analysis of each LEA's needs.
 - Includes supports for Early Childhood Programs, Secondary Transition, and Students with Significant Cognitive Disabilities.
 - Goal: To implement comprehensive plans for Technical Assistance and Professional Learning programs for LEAs, focusing on enhancing their understanding and implementation of federal and state special education policies, laws, and best practices.

Partnerships

The Office of Inclusive Education engages external agencies and partners in their support of LEAs and students. These partners include, but are not limited to, the following:⁷²

Note: This list is sourced from interviews with OIE staff. Descriptions of partnerships are sourced from interviews with OIE staff as well as overview information provided at the website linked within each partner name in the list below.

- **Nevada Governor's Council on Developmental Disabilities**
 - The Nevada Governor's Council on Developmental Disabilities (NGCDD) engages in advocacy, system's change and capacity building activities for people with developmental disabilities and their families in order to promote equal opportunity, self-determination, and community inclusion.
- **Nevada State Rehabilitation Council**
 - The mission of the Nevada State Rehabilitation Council (NSRC) is to help ensure that vocational rehabilitation programs (Bureau of Vocational Rehabilitation and Bureau of Services to the Blind and Visually Impaired) are consumer oriented, consumer driven, and

⁷² <https://doe.nv.gov/offices/inclusive-education/boards-commissions-and-state-agency-partnerships>, interviews with NDE staff and external partners, 2024.

that the programs' services and resources result in employment outcomes for Nevadans with disabilities.

- **Nevada Commission on Autism Spectrum Disorders**
 - The Nevada Commission on Autism Spectrum Disorders was created to continue the work of the Nevada Autism Task Force. The commission supports all Nevadans living with Autism Spectrum Disorder will achieve optimal outcomes to reach their full potential.
- **Nevada Early Childhood Advisory Council**
 - The Nevada Early Childhood Advisory Council (ECAC) works to strengthen state-level coordination and collaboration among the various sectors and settings of early childhood programs.
- **Nevada Early Intervention Interagency Coordinating Council (ICC)**
 - The Nevada Early Intervention Interagency Coordinating Council (ICC) brings policy makers, service providers, and parents together. It serves to support and assist with the ongoing development and implementation of quality statewide early intervention services for young children with disabilities and their families.
- **Department of Health and Human Services (DHHS), Early Intervention Services (EIS)**
 - The Nevada Department of Health and Human Services (DHHS) is the Lead Agency for Early Intervention Services (EIS). The Part C Office provides the oversight of Early Intervention Services of the Individuals with Disabilities Education Act (IDEA).
- **Special Education Advisory Committee (SEAC)**
 - The Individuals with Disabilities Education Act (IDEA) requires that each state establish and maintain an advisory panel for the purpose of advising the state special education **staff regarding the education of eligible children with disabilities. This includes advising** the state on the education of students with disabilities who have been convicted as adults and are incarcerated in adult prisons, even if a state assigns general supervision responsibility for those children to a public agency other than a state education agency (SEA). Nevada's State Special Education Advisory Panel is called the Special Education Advisory Committee (SEAC).
- **Nevada Assistive Technology Collaborative (NATC)**
 - The Nevada Assistive Technology Collaborative (NATC) and Aging and Disability Services Division provide a variety of Assistive Technology (AT) services to support people to live more independently and within their communities.
- **Nevada Center for Excellence in Disabilities (NCED)**
 - The NCED serves as Nevada's University Center for Excellence in Developmental Disabilities (UCEDD). UCEDDs work to accomplish a shared vision that foresees a nation in which all Americans, including Americans with disabilities, participate fully in their communities.
- **Nevada Center for Independent Living**
 - Centers for Independent Living (CIL) are community-based, cross-disability, non-profit organizations designed and operated by people with disabilities. CILs are unique in that they operate according to a strict philosophy of consumer control, wherein people with all types of disabilities directly govern and staff the organization.

- [Northern Nevada Center for Independent Living](#)
- [Southern Nevada Center for Independent Living](#)
- [Nevada Statewide Independent Living Council \(SILC\)](#)
 - The Nevada SILC advocates for the development of a network of programs, services and options designed to empower Nevadans with disabilities to live independently in the community.
- [Nevada Vocational Rehabilitation \(VR\)](#)
 - Vocational Rehabilitation (VR) Nevada supports adults and students with disabilities to prepare for, obtain, and advance in meaningful employment through a range of services based on their employment goals.
- [NV PEP](#)
 - Nevada PEP (Parents Encouraging Parents, Parents Empowering Parents, Parents Educating Professionals) is a statewide organization serving families of children and youth with disabilities and behavioral health needs from birth to 26 and their service providers.
- [Nevada Achieving a Better Life Experience \(ABLE\)](#)
 - The ABLE Program allows eligible Nevadans with disabilities to create a special tax-advantaged savings and investment account for personal and disability-related expenses.
- [National Technical Assistance Centers on Transition \(NTACT:C\)](#)
 - The National Technical Assistance Center on Transition: The Collaborative (NTACT:C) is a Technical Assistance Center co-funded by the U.S. Department of Education's Office of Special Education Programs (OSEP) and the Rehabilitation Services Administration (RSA).
- [Nevada TRIP](#) Advisory Workgroup and Partners
 - The **Nevada Transitions Roadmap through Innovative Partnerships (Nevada TRIP)** is empowering students with disabilities from elementary school through high school to enrolling in higher education, finding a job and future independence.
- [Nevada's University Center for Excellence in Developmental Disabilities \(UCEDD\)](#)
 - Through University of Nevada, Reno (UNR)
 - The UCEDDs were established and funded by the Developmental Disabilities Rights Assistance and Rights Act (DD Act). UCEDDs work to accomplish a shared vision that foresees a nation in which all Americans, including Americans with disabilities, participate fully in their communities.
- [Office of General Curriculum Access](#)
 - Through University of Nevada, Las Vegas (UNLV)
 - The Office of General Curriculum Access (OGCA) in the College of Education at UNLV is a partnership with the Nevada Department of Education, Office of Inclusive Education. Mission Statement: To create access to Nevada's general curriculum by providing educators with standards-aligned instructional materials, academic and behavioral support resources, and effective professional development.

- Nevada Department of Native American Affairs, Indian Education Advisory Committee
 - The mission of the Education Advisory Committee for Native American & Alaska Natives is to support, promote, and assure optimum educational opportunity that is based on tribal cultures, and maximizing participation in the education of American Indians and Alaskan Natives (AI/AN) in Nevada.
- Inter-Tribal Council of Nevada
 - ITCN is a consortium and governing body of the Tribal governments in the state of Nevada. Since its inception, ITCN has served as a consortium to advance and serve on various tribal issues and is a recipient of many federal and state funds that provide social service programs, resources and support to the tribal communities throughout the state.

FINDING

OIE's current staffing levels and organizational structure are insufficient to meet the demands of sustainably supporting the many stakeholders that the Office serves. A lack of role clarity resulting from inadequate staffing also diminishes OIE's effectiveness.

OIE has been able to find ways to work together and engage external partnerships in order to adequately move essential work forward. Staff interviews, however, consistently highlighted that significant capacity challenges and role misalignments limited what they could do, and they expressed concerns about the sustainability of their work. Staff expressed that there are opportunities to support student learning more effectively given adequate staffing.

Interviewees were essentially unanimous in highlighting understaffing across the Office throughout interviews. Examples of points made by internal staff include:

- “(OIE is) definitely understaffed... always has been. Seems that every legislative session there are additional laws, groups, programs, but not additional staff.”
- “We need more people.”

These points are corroborated by external partners of the OIE whom our team interviewed, many of whom have the perspective of seeing staffing levels for similar work in other states:

- *“I always feel like they are understaffed. They do an amazing amount of work.”*
- *“I don’t know how they do it with just 12.”*
- *“Definitely get the impression that there is a significant need for additional staff. Could be doubled or tripled... would be reasonable.”*

Both internal and external staff were keen on highlighting the opportunity to do more with additional staff:

- *“If appropriately staffed, (there could be) more consistent services and cohesion of services. The service delivery model could look better.”*
- *“There is work we are required to do, and if we are only doing required work, we can’t get to additional work to support LEAs and students.”*

- *“With more staff, could improve outcomes more. Not just in one area. As is, it’s whack-a-mole. Hard to take proactive or strategic steps.”*

Furthermore, staff noted the gap in staffing levels for NDE relative to other SEAs:

- *“We need more people. Looking at other SPED offices, Utah has a comparable SPED rate to us, and they have many more people.”*
- *“Arizona has 20 people doing this, while there is only 1 of me in Nevada.”*
- *“We have 10,000 fewer students than Utah, which has 42 people in SPED departments, vs 11 for us, though it’s not apples-to apples.”*

The above points shared in interviews are corroborated by data, based on our peer state research for those states in which staffing comparisons for inclusive education could be discerned. This research revealed the following:⁷³

- The Utah Department of Education has 41 staff categorized under “Special Education”, compared to 15 at across NDE’s Office of Inclusive Education.
- Arkansas shows a total of 42 staff assigned to various Special Education categories, including Dispute Resolution (covered by the OID at NDE).
- Oregon includes 41 staff that are in areas covered by the OIE at NDE: 24 staff assigned to IDEA categories, 11 assigned to “Inclusive Services,” and an additional six within a separate Office of Indian Education.
- Note: Slight discrepancies in data can be attributed to differences in how teams and individual staff are defined, as well as vacancies at a given time for a data snapshot.

The number of LEAs that the NDE Office of Inclusive Education serves is a key consideration in assessing the Office’s staffing needs. Accordingly, NDE staff and external partners interviewed were upfront in sharing that one mitigating factor in the staffing needs for the Office of Inclusive Education is the relatively low number of districts that the Office serves. This presents an advantage in terms of efficiency in serving LEAs and the ability to build relationships with stakeholders at LEAs that the Office supports. Insights supporting this point taken from interviews include the following:

- *“Staffing is helped by the fact that we have fewer LEAs”*
- *“We do feel lightly staffed. One of the main reasons we can get away with that is because there are so few districts that we can lean on personal relationships.”*

Despite the relatively low number of LEAs (17) in Nevada, there remains an acute need to increase staff for the OIE.

Before addressing the need to increase staffing for OIE to meet its goals, and how to do so, the review team identified commendations that must be highlighted in terms of OIE’s ability to move its work forward in spite of low staffing levels:

⁷³ Nevada Department of Education, Utah Department of Education, Arkansas Department of Education, Oregon State Department of Education, 2024.

COMMENDATION 3-K:

The Office of Inclusive Education effectively works together based on a culture of trust and teamwork. The staff has remained relatively stable as a result, and this stability supports their ability to manage their work together with a small team.

Individual staff members were overwhelmingly positive when asked about the OIE team. A selection of quotes on this point are as follows:

- “Our office is very strong. We all get along well, we work together. It’s not siloed like the Department is. Our turnover rate is very low.”
- “Why is OIE better? Culture. Treat people decently.”
- “Could not ask for a better team to be a part of. Welcoming, helpful.”
- “Amazing group, with a lot of state experience. Not a lot of turnover. I’m still learning from colleagues. There are no rivalries. We put egos aside.”
- “We are very close-knit. We have a good understanding of what each other does, we work well together, intermix, jump in on each other’s project to support very quickly.”
- “Staff are great. So positive and welcoming. They bend over backwards to be helpful.”

Accompanying these quotes is a recognition of strong leadership that has contributed to the culture described. All of these points together allow the group to move essential work forward despite being understaffed. A challenge is that team members must pick up for each other by stepping outside of their role – more so than would be recommended – in order to do so.

COMMENDATION 3-L:

In addition to internal team cohesion, the Office of Inclusive Education has fostered an ecosystem of strong partnerships to increase their capacity to serve LEAs and students across Nevada despite inadequate staffing.

Interviews with external partners reveal that the Office is humble in engaging others to support their work and willing to call on experts to deliver the best possible support for districts and students. The list of such external partners is vast. The office overview in previous pages lists many of these partnerships but is not exhaustive. Interviews with staff from UNLV, UNR, NV PEP (Parents Encouraging Parents, Parents Empowering Parents, Parents Educating Professionals), and American Institutes for Research (AIR) reveal the following insights in support of the commendation above (note: to keep anonymity and protect confidentiality, the order of the quotes below does not align with the order in the preceding list):

- *“I have been impressed – they want to promote evidence-based best practiced, top research. They bring in the top experts in the field to talk to teachers.”*
- *“Always a collaborative relationship with NDE.”*
- *“They are short staffed, so we try to be an arm for them.”*

Based on the points noted in the two commendations above, the team is able to do much in spite of staffing challenges and is able to manage the work that must be done to meet IDEA compliance and fundamental needs of LEAs and students. Ideally, the Office should be able to further leverage these strengths to improve service delivery through adequate staffing.

RECOMMENDATION 3-13:

OIE staff should be augmented strategically in order to ensure role clarity and to create or strengthen sub-units within OIE that are adequately staffed and dedicated to specific functions.

The team has navigated inadequate staffing by crossing roles and picking up for each other as needed to meet the broader team goals. This sense of teamwork is refreshing, but it depends on individuals extending beyond their roles. This approach is not sustainable and does not provide the focus needed for staff to be as effective as they can in their defined roles. Staffing to gain role clarity will confer three advantages:

1. The requirement for staff to step outside of their role as standard practice, in current state, will be reduced to a minimum. There will likely still be opportunities for such teamwork, but only in extenuating circumstances (i.e., vacancies, leave, unexpected events).
2. The team's dependence on external partners, vendors, and contractors in order to gain sufficient capacity for essential work will decrease. This will give the team more resilience and strengthen relationships with LEAs through more face time and direct support.
3. The team will be better able to serve districts holistically, with more robust supports for improved student outcomes, extending beyond mere compliance to a stronger service delivery model that will include ongoing training and better implementation support.

The implementation plan for this broad recommendation to pursue strategic staffing for role clarity will be to enact the component recommendations that follow next. The financial impact for this broad recommendation will be disaggregated into each of these component recommendations.

One point that was immediately evident to our team through staff interviews is that OIE is lacking in staff to provide administrative support. As currently staffed, the Office of Inclusive Education includes two Administrative Assistants (AAs) – an AA IV and an AA III. Staff interviews reveal that there are two challenges with this level of administrative staffing. First, a significant portion of the AA IV's role in reality (not as formally defined) is dedicated to managing dispute resolution, which requires a majority of her time and thus impedes upon her ability to provide true administrative support as defined by her role. Second, even if the AA IV were fully dedicated to administrative support as outlined in the job description, there would still not be enough administrative support across the Office. These concerns are substantiated by staff interviews, which consistently highlight these points:

- *"They continue to add staff but not support staff. EPPs can be completely overwhelmed but the AA III can't support the EPPs in the majority of what they do because there are too many of them."*
- *"Our Admin III – don't know how she does it. She has so much on her plate."*
- *"Our AA has too many programs on her plate. We need 2 or 3 more of her. I feel guilty asking questions."*
- *"We are low staffed in AA support. The main AA (the AA IV) does the equivalent of a supervisor."*
 - Note: The point about doing the equivalent of a supervisor is in reference to the AA IV's management of dispute resolution.

RECOMMENDATION 3-14A:

Increase Administrative Support across OIE by creating an Administrative Assistance Unit that includes two new staff, one dedicated to Indian Education and one dedicated to dispute resolution. These two new roles will free up the two existing Administrative Assistant roles to care for SPED and GATE, as well as across the Office.

Based on the gap in admin support across OIE and challenges with role clarity for the AA IV position in actual practice, we recommend taking the following three steps:

1. Add an AA role (AA III) to care for administrative support specifically for the Indian Education Program. This step will free up the two current AA positions to oversee admin support for GATE and SPED. The nature of program and relationship management for the Indian Education program is distinctive enough to merit a dedicated AA role to support the program.
2. Add an AA role (AA III) to care for administrative support specifically for dispute resolutions. This step will free up the AA IV currently managing dispute resolutions to guide administrative support across the office. Implementing this step feeds into subsequent **Recommendation 3-14B** – creating a dedicated Dispute Resolution Unit, to follow.
3. Assign the current AA IV as the Supervisor for the two new AA IIIs alongside the existing AA III, so that this position may oversee a full administrative support unit for the office. This arrangement will result in one AA IV supervising three AA IIIs, as follows:
 - a. Current AA III providing administrative support across the office, with focus on GATE and SPED.
 - b. New AA III providing administrative support with a core focus on Indian Education.
 - c. New AA III providing administrative support with a core focus on dispute resolution.

FISCAL IMPACT

The average salary for an Administrative Assistant III is currently \$44,538. Assuming benefits of approximately 50 percent, the annual cost for filling this new position would be as follows:

Classification	Number of Positions	Annual Salary	Benefits @ 50% of Salary	Total Cost
Admin Assistant 3	2	\$89,076	\$44,538	\$133,614
Annual Total				\$133,614

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Create an Admin Support unit with two new AA IIIs	(\$133,614)	(\$133,614)	(\$133,614)	(\$133,614)	(\$133,614)

Our team has also determined that in addition to administrative support, dispute resolution is another area that will benefit from additional dedicated support. In the current state, as previously noted, the Office's AA IV manages dispute resolutions. In addition, multiple EPPs are on call to provide additional support on dispute resolutions as needed. This arrangement creates challenges for role clarity for all

involved staff, distracting from the team's collective focus. This arrangement also diminishes the efficiency of dispute resolution.

RECOMMENDATION 3-14B:

Create a Dispute Resolution Unit with a dedicated Education Programs Professional and a dedicated Administrative Assistant.

Given these challenges, we recommend the following steps to augment staffing and increase focus for dispute resolution:

1. Add one EPP role dedicated to dispute resolution. Interviews revealed that one to two EPPs may ultimately be ideal for this oversight. Our team recommends a stepwise approach, beginning with one additional EPP and adding another in the long-term only if necessary.
2. Assign the previously noted (in **Recommendation 3-14A**) AA III addition to support the EPP in dispute resolutions.
3. Engage the AA IV who is currently managing disputes in training the new EPP and AA III on managing and coordinating disputes.
4. Once training and handover are complete, free up the AA IV to augment and lead admin assistance across the office, as noted in **Recommendation 3-14A**.

FISCAL IMPACT

The average salary for an Education Programs Professional is currently \$84,839. Assuming benefits of approximately 50 percent, the annual cost for filling this new position would be as follows:

Classification	Number of Positions	Annual Salary	Benefits @ 50% of Salary	Total Cost
Education Programs Professional	1	\$84,839	\$42,429	\$127,259
Annual Total				\$127,259

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Increase Administrative Support	(\$127,259)	(\$127,259)	(\$127,259)	(\$127,259)	(\$127,259)

Another area that will benefit from increased capacity and dedicated focus is the administration of grant programs and management of resources to support programs across the Office. The work of the Office of Inclusive Education depends primarily on grant funding and administration of grant funded programs. The team must collaborate closely with the Grants Management Unit on disbursement, and considerable fiscal management of grant programs is required to ensure effective coordination and implementation. To this end, it is critical for OIE to maintain a dedicated fiscal lead within OIE to work alongside OIE grant program leadership.

One antipattern that has developed is that grant programs may be managed based on continuity of ownership even after roles change, rather than being properly reassigned based on current roles. This

stems from team capacity issues that compromise the ability to hand management of a grant program over to someone else on the team. The result is misalignment of grant program management with roles, which further diminishes broader team capacity and focus. For example, the State Personnel Development Grant (SPDG) is still managed by the Office Director, because the responsibility of management of the SPDG was carried over from previous roles, starting as an EPP then continuing through promotion to an EPS and then Director. This misalignment distracts from focusing on Director level work.

Additionally, the Office would benefit from a forward-looking view of resource allocation pertaining to grant programs and proactive searching for funding and partnership opportunities. There are also tasks such as grant writing and coordination of grant programs that would benefit from dedicated staff and focus.

RECOMMENDATION 3-14C:

Create a Resource Management Unit with a dedicated Education Programs Professional and a Program Officer.

This recommendation can be broken down to the following implementation steps:

1. Add one EPP position dedicated to program leadership of grant resources and special projects.
2. Add one Program Officer position dedicated to fiscal coordination of grants, resources, and special projects.

FISCAL IMPACT

The average salary for an Education Programs Professional is currently \$84,839, and a Program Officer 2 is \$65,384. Assuming benefits of approximately 50 percent, the annual cost for filling these new positions would be as follows:

Classification	Number of Positions	Annual Salary	Benefits @ 50% of Salary	Total Cost
Education Programs Professional	1	\$84,839	\$42,429	\$127,259
Program Officer 2	1	\$65,384	\$32,692	\$98,076
Annual Total				\$225,335

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Create a Resource Management Unit	(\$225,335)	(\$225,335)	(\$225,335)	(\$225,335)	(\$225,335)

The Indian Education Program has expanded its programs considerably in recent years, requiring the recent addition of an Education Programs Professional position in order to bring added focus to expanding tribal consultation work. This second EPP started in August 2024. Other expanding initiatives include the Indian Education Summit, Native Youth Community Project (NYCP), broadening technical assistance and professional learning, and the Great Basin Native Languages Project. The program has brought on two independent contractors to support this work; however, these contracts are not sustainable in the long-term. Therefore, the program seeks to continue expanding internal capacity.

RECOMMENDATION 3-14D:

Expand full-time capacity of the Indian Education Program and begin steps towards the creation of a separate Office of Indian Education.

Such expansion of capacity includes two points in the near term that are supported by this recommendation:

1. OIE has already submitted a request with the legislature for an EPS to provide oversight across the growing Indian Education program. This necessity of this request is affirmed by our team through this recommendation and will be added to the fiscal impact here since it has not yet been approved.
2. OIE has expressed the need for administrative support for Indian Education, as noted in **Recommendation 3-14A**. The fiscal impact of that addition has already been accounted for in the previous recommendation.

In the long-term, our team sees issues with the Indian Education Program being placed alongside Special Education programs within the Office of Inclusive Education. The challenge with this arrangement as revealed by interviews is three-fold. First, Indian Education independently engages Divisions and Offices across NDE as well as LEAs in ways are distinct from SPED and therefore merit Indian Education functioning as its own office. Second, Indian Education is funded largely through state funding, while SPED is funded primarily by IDEA funding. This dramatic difference in funding streams guides differences in the nature of the work for the two programs. Third, there are perception issues with Indian Education being positioned together with Special Education, an association that is unwarranted and may not be positive for the Native American community.

Based on these points, we recommend a move of Indian Education away from OIE and into its own independent office. But the program is not yet ready for that move, based on Indian Education's small number of staff (two staff currently, four with suggested recommendations) and a lack of a dedicated Director to lead the team. Given these constraints, we have set the following two preconditions for our recommendation to create a separate Office of Indian Education: 1. Continued growth of Indian Education programs and support warranting further expansion of team capacity, and 2. Establishment of a Director to lead the newly created Office. We see the potential for these preconditions to be met in two to four years and will define the fiscal impact of this recommendation based on the anticipated impact in three years.

FISCAL IMPACT

The average salary for an Education Programs Supervisor is currently \$86,901, and a Director is \$92,455. Assuming benefits of approximately 50 percent, and assuming the preconditions for hiring a Director will be met in three years, the annual cost for filling these new positions would be as follows:

Classification	Number of Positions	Annual Salary	Benefits @ 50% of Salary	Total Cost
Education Programs Supervisor	1	\$86,901	\$43,451	\$130,352
Director	1, in years 4-5	\$92,455	\$46,228	\$138,683
Annual Total				\$130,352 until 2028, then \$269,035

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Expand capacity of Indian Education now and potentially create a separate Indian Education Office in 3 years.	(\$130,352)	(\$130,352)	(\$130,352)	(\$269,035)	(\$269,035)

Another area within OIE that will benefit from increased capacity and focus is Program Monitoring. In current state, the Integrated Monitoring Component of the NVGSS (referenced on page 193) is guided by a dedicated EPP, together with additional support that this EPP calls upon from fellow EPPs in OIE, depending on their role. Monitoring carries a caseload of 17 LEAs on a four-year cycle. The review cycle proceeds according to the timeline shown below in **Exhibit 3-24** below:

EXHIBIT 3-24 SPECIAL EDUCATION PROGRAM MONITORING PROCEDURES

Year One: Assessment, File Monitoring

In October, the following activities occur:

- LEAs are notified that they are in a monitoring year
- An informational meeting is held with LEAs who will be monitored during the school year
- The NDE pulls student data from Infinite Campus and mails surveys to parents to collect Indicator 8 survey data

In November/December, the following activities occur:

- LEAs prepare and submit required/requested data and the NDE preliminarily selects student files to review

In January/February, the following activities occur:

- LEAs submit required documents and the NDE makes final selection of student files

In March/April/May, the following activities occur:

- The NDE conducts on-site monitoring in the LEAs scheduled for monitoring
- The NDE conducts a review of district policy/procedure/forms
- The NDE conducts a review of data submitted to evaluate Indicator 12 (requirement to develop IEPs by 3rd birthday for eligible children transitioning from Part C to Part B)
- The NDE conducts follow-up verification procedures to ensure that compliance findings are accurate and verifiable, including follow-up work on data submitted for Indicator 12 and monitoring findings for Indicator 11 (45-school-day initial evaluation timeline)

In June, the following activities occur:

- The NDE provides written notification of findings of noncompliance to each LEA, as applicable

Year Two: Corrective Action

In September, the following activities occur:

- The NDE meets with the LEA (in-person or via remote technology) and reviews the District Compliance Report and corrective action requirements that were provided to the LEA in June

In September/October, the following activities occur:

- Each LEA completes and submits its Corrective Action Plan (CAP) for NDE review and approval

In October/November, the following activities occur:

- The NDE either approves the submitted CAP or requires revision, to be submitted promptly

From November through April, the following activities occur:

- LEAs submit any required revisions to policy/procedure/forms
- LEAs submit corrections of each individual case of noncompliance where the noncompliance can be corrected (i.e., noncompliance that can be corrected through an IEP revision); generally, these refer to noncompliance for items 10 and 38-91 on the Student Record Review Checklist
- LEAs submit evidence to document that the LEA is correctly implementing regulatory requirements associated with items 10 and 38-91, and items 11-37, by submitting a designated number of new files (not previously monitored) demonstrating that the LEA is correctly implementing regulatory requirements that were found to be noncompliant during the monitoring review
- The NDE reviews all evidence submitted to verify the correction of identified noncompliance

Year Three: Maintain and Retrain, and as necessary Continued Corrective Action

- If all noncompliance has not been corrected within one year, the NDE continues to work with the LEA to ensure that corrective action has been taken, including taking enforcement action as may be necessary to address uncorrected noncompliance
- The NDE will work with the LEA to provide targeted training, professional development, and other activities to verify that the LEA has corrected each individual case of noncompliance and that the LEA is correctly implementing the regulatory requirements, with 100% compliance

Source: Nevada Department of Education, Office of Inclusive Education, Special Education Program Monitoring Procedures, July 2022.

Given in-depth monitoring for each LEA for two (years one and two above) out of every four years, in any year half of all districts are actively engaged with the EPP overseeing monitoring. With this caseload, the EPP is able to meet IDEA compliance requirements of monitoring, but little beyond that. This reality places an emphasis on evaluations and IEPs. At the same time, the team as well as external partners have expressed interest in shifting from a pure compliance orientation to one of effective compliance together with a focus on outcomes, with added emphasis on implementation and programming, to help deliver better outcomes. But capacity to make that improvement is lacking.

RECOMMENDATION 3-14E:

Add two new staff dedicated to monitoring and create a separate Monitoring Unit by joining these two new positions together with the current EPP position already dedicated to monitoring.

To address this lack of capacity to meet the desired goals, Public Works recommends the following actions to create a dedicated monitoring unit:

1. Add one EPP to share oversight of monitoring.
2. Cut the current caseload for each EPP in half, opening the door for a more comprehensive approach to integrated monitoring, beyond mere compliance.
3. Add a dedicated Program Officer to help coordinate the work of integrated monitoring, including the steps detailed in the monitoring procedures shown in the exhibit above. The addition of this position will add focus to monitoring efforts and make them more efficient, freeing up capacity for the two EPPs to focus on guiding LEAs to programmatic improvement that can improve student outcomes.

FISCAL IMPACT

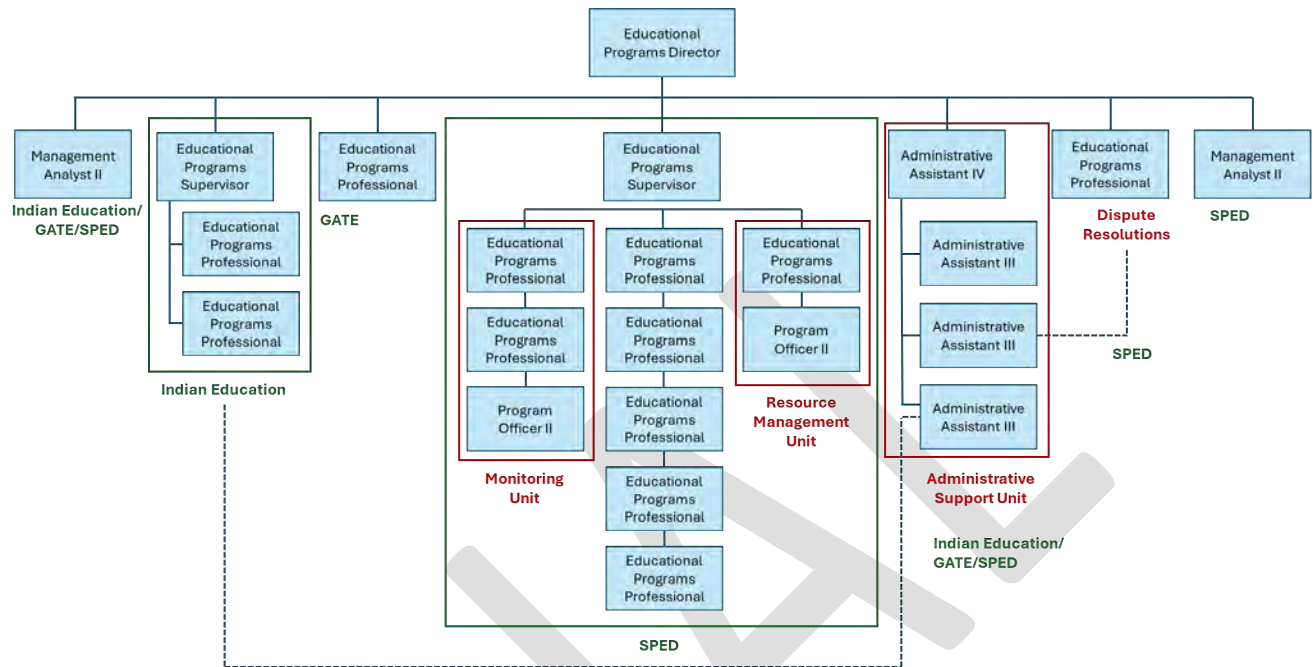
The average salary for an Education Programs Professional is currently \$84,839, and a Program Officer 2 is \$65,384. Assuming benefits of approximately 50 percent, the annual cost for filling these new positions would be as follows:

Classification	Number of Positions	Annual Salary	Benefits @ 50% of Salary	Total Cost
Education Programs Professional	1	\$84,839	\$42,429	\$127,259
Program Officer 2	1	\$65,384	\$32,692	\$98,076
Annual Total				\$225,335

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Create a Monitoring Unit	(\$225,335)	(\$225,335)	(\$225,335)	(\$225,335)	(\$225,335)

The collective result of implementing **Recommendations 3-14A** through **3-14E** will be a realignment of the Office of Education designed to increase capacity, role clarity, efficiency, and focus across the office. The newly proposed organization chart upon implementation of all short-term recommendations will be as shown below in **Exhibit 3-25**.

**EXHIBIT 3-25
NEWLY ALIGNED ORGANIZATION CHART
OFFICE OF INCLUSIVE EDUCATION**



Source: Compiled by Public Works from Office level organization chart combined with **Recommendations 3-14A** through **3-14E**.

With this newly proposed structure, OIE will have 22 FTEs including the Office Director. Seven of these FTEs are proposed additions per **Recommendations 3-14A** through **3-14E**.

FINDING

OIE demonstrates a strong service orientation. The Office has an opportunity to build on this strength through expanded stakeholder outreach and additional formal feedback channels.

Interviews with OIE staff consistently revealed great care for serving students as their primary stakeholders. Quotes reflecting this mindset include:

- *“With everything I do each day, I ask: “Is what I am doing today having an impact on students with disabilities.”*
- *“Ultimately students are our primary focus. We make decisions based on what is best for students.”*

External partners who work alongside OIE agree: *“They are focused on student achievement.”*

The Office also recognizes that successfully helping students requires building strong relationships with LEAs, educators, and others in the community that serves students. This is reflected in points shared in interviews, in activities that the Office guides, and in survey feedback.

Interview comments include:

- *“OIE is relationship oriented. We gather districts together to get their feedback and meet their needs. Focus on what are the needs that we can support. We value service orientation.”*
- *“I make sure they know I’m there for them, a safe person to turn to. Since we have so few school districts, I can lean on building relationships.”*
- *“The Indian Ed program is so authentically invested in the Native community, in equity, in the program.”*

Activities to support LEAs and students are too many to provide a complete list here. Some highlights include:

- Monthly meetings with Special Ed Directors Association (SEDA), which includes SPED Directors from each LEA.
- Two retreats with SEDA, two and five days each.
- Director’s Academy for new SPED Directors.
- Close engagement with the Inter-Tribal Council of Nevada.
- Indian Education Summit.

Our LEA Survey feedback was also complimentary of OIE, both quantitatively and qualitatively. Quantitative results, shown below in **Exhibit 3-26**, indicate that only 22.9 percent of respondents were dissatisfied with the level of support and services provided by OIE, vs 43.5 percent for the Student Achievement Division as a whole.

EXHIBIT 3-26
LEA SURVEY EXCERPTS RELATED TO LEVEL OF OIE SUPPORT

How would you rate the level of support and services provided by the Student Achievement Division and its Offices of NDE to districts and charter schools?

Answered: 131 Skipped: 1

	EXCELLENT	GOOD	NO OPINION/ DON'T KNOW	FAIR	POOR	TOTAL
▼ Student Achievement services provided by the Division as a whole.	0.76% 1	19.85% 26	35.88% 47	37.40% 49	6.11% 8	131
▼ Services provided by the Assessment, Data, & Accountability Management Office.	3.08% 4	20.77% 27	34.62% 45	33.08% 43	8.46% 11	130
▼ Services provided by the Early Learning & Development Office.	3.85% 5	22.31% 29	50.00% 65	17.69% 23	6.15% 8	130
▼ Services provided by the Office of Inclusive Education (includes SPED, GATE, Indian Ed).	12.21% 16	15.27% 20	49.62% 65	18.32% 24	4.58% 6	131
▼ Services (includes GEAR UP) provided by the Student & School Support Office.	0.00% 0	12.31% 16	63.85% 83	19.23% 25	4.62% 6	130
▼ Services provided by the Teaching & Learning Office.	1.54% 2	16.92% 22	47.69% 62	29.23% 38	4.62% 6	130

Source: NDE LEA Survey Results, Public Works, November 2024.

Qualitative survey responses from LEAs that include specific references to OIE are as follows:

- *“When working with OIE in particular, the customer service is very effective.”*
- *“OIE is supportive, informative, timely, and student-focused.”*
- *“OIE is responsive to requests and have been consistent in their message. They still offer district in-person support, but it is often pushed to virtual instead.”*

COMMENDATION 3-M:

OIE demonstrates a strong commitment to stakeholder engagement and relationship building in the service of districts and students.

A strength of the engagement described above is OIE’s deep relationships with SPED Directors at each district. Their approach is to intentionally channel their outreach to districts through this group. This approach is efficient, and it yields excellent relationships with those designees who lead SPED in each district. But it can also leave a gap when outreach does not carry forward through the Directors to other district stakeholders. At times, interviews revealed that such outreach can in fact be uneven in this way, given how expansive SPED Director roles are in the larger districts and how varied the SPED Director role can be in smaller districts, where designated SPED Directors can have much broader roles encompassing a variety of other responsibilities. Insights revealing this challenge from staff interviews include:

- *“The challenge is that we share out with SPED Directors to share out with their districts, but depend on them to do so, and therefore many tools or resources don’t make it to educators. Especially in Clark and Washoe... 1 Director can’t share with so many educators.”*
- *“Directors at the smaller districts have responsibilities beyond the Director of SPED role. Those at the two large LEAs have focused roles. The challenge is that in the past, we have always just dealt with SPED Directors. What we have found is that in the last few years we have had to expand our circle a bit more. So we have to build expanding listservs. Before we were able to rely on the Directors to triage and share information or requests out”*

RECOMMENDATION 3-15:

Expand outreach to external stakeholders, including increased in-person visits to support district staff and educators.

The comments above indicate that OIE is aware of the challenge and is also beginning to take steps to address it, a testimony to their service orientation. The team should continue broadening outreach to address this issue, while also maintaining the strong relationships with SPED Directors that are so critical to their connection to districts. Next steps for implementing expanded outreach include:

1. Broaden stakeholder outreach beyond SPED Directors.

- Develop a system of direct communication with additional stakeholders at the district level, such as school principals, special education teachers, and other relevant staff.
- Expand the use of district-specific listservs to include broader audiences, ensuring tools, resources, and updates reach educators and administrators directly.

2. Customize communication for large and small districts.

- For larger districts (e.g., Clark and Washoe):
 - Schedule regular in-person or virtual meetings with key sub-groups within the district to ensure consistent dissemination of information.
 - Pilot targeted communication channels tailored for educators in high-need areas to ensure outreach efforts are not bottlenecked at the Director level.
- For smaller districts:
 - Provide tailored support to SPED Directors with broad responsibilities by offering streamlined, role-specific communication tools or templates they can adapt and use.
 - Increase in-person engagement for smaller districts to reinforce relationships and ensure the effective transfer of knowledge and resources.

3. Create a tiered outreach strategy.

- Establish a tiered engagement approach that includes:
 - SPED Directors for strategic and district-level planning.
 - Special education teachers and principals for implementation support and professional development.
 - Other district stakeholders, such as curriculum coordinators or family engagement liaisons, for specialized needs.

4. Build a regional engagement framework.

- Designate OIE staff as regional liaisons for clusters of districts. These liaisons would serve as direct points of contact for a broader group of district stakeholders, ensuring consistent communication and relationship building.

5. Leverage technology to expand reach.

- Utilize tools such as webinars, online workshops, and virtual office hours to engage educators and staff who may not directly interact with SPED Directors.
- Develop an online hub where districts can access key resources, updates, and communication directly, without relying solely on intermediary sharing.

6. Monitor and evaluate outreach effectiveness.

- Conduct regular surveys of district-level stakeholders (e.g., principals, teachers, coordinators) to measure the reach and impact of OIE communication.
- Use feedback from these surveys to adapt and improve outreach strategies.

7. Increase in-person engagement opportunities.

- Allocate resources for more in-person meetings, retreats, and district visits as OIE's budget and staffing increase.
- Host regional forums or summits to allow educators and district staff to share insights, ask questions, and engage directly with OIE leadership.

These steps will help OIE expand its engagement reach while maintaining its strong relationships with SPED Directors. By diversifying outreach and increasing touchpoints with a broader set of stakeholders, OIE can ensure that critical information, tools, and resources effectively reach the educators and students they aim to support.

FISCAL IMPACT

Incremental costs associated with this recommendation would primarily be driven by additional travel associated with increased in-person engagement opportunities. We project \$10,000 per year, estimated to cover 20-40 short trips of one to two days within Nevada.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Increase in-person engagement with stakeholders	(\$10,000)	(\$10,000)	(\$10,000)	(\$10,000)	(\$10,000)

FINDING

The culture of trust and teamwork noted in Commendation 3-K is tempered by a lack of cohesion between the north (Carson City) and south (Las Vegas) offices.

Approximately half of OIE's staff are located in each of the two main offices, but the centralization of leadership in the north, along with differences in desk arrangements between the two offices, has contributed to feelings of unfairness and disconnect among staff in the south. In interviews, southern staff expressed that communication across the offices is uneven, reducing collaboration and team

cohesion. Staff in the north office acknowledge this challenge as well. Staff also recognize the contributions of the former EPS (the EPS position was vacant at the time of staff interviews) in helping to bridge the two offices. Insights from interviews include the following (note: office location of team member precedes each quote):

- North: *“Probably would be good to have someone there, an assistant director. Probably feel a bit left out down south. How they’re set up there is awkward—don’t have that team feeling.”*
- North: *“There are challenges with the north-south split. We are all close together here in one central spot, in south they are spread around. Because we’re in one central spot, they (the south staff) think—‘they discuss things that we never hear about.’”*
- South: *“There is a disconnect between north and south staff. Both are extremely close with each other, but not across the two offices... ..The south staff feels inequity – not treated the same, not same expectations... .. (The former EPS) was in Carson City, but she did come to Las Vegas at least once per month. And she was present. Not just there for an event.”*
- South: *“We got a lot of support from (the former EPS), including moral support, with everything we’re doing.”*

Based on these insights, we are optimistic that intentional steps to bridge the divide, including reestablishing leadership presence in the south office through filling the vacated EPS positions, will improve team unity and overall efficiency in their collaboration across the Office.

RECOMMENDATION 3-16:

Take steps to enhance cohesion among staff in the north and south OIE offices.

To address the lack of cohesion between the Carson City and Las Vegas offices, OIE should adopt a multi-pronged approach to build trust and improve communication across locations. The incoming EPS should establish a consistent presence in both offices and serve as a bridge to strengthen relationships and communication between staff in the north and south. Initiatives to support this effort include organizing regular cross-office team-building activities and creating shared physical spaces for collaboration within the south office. We recommend reviewing current practices and enhancing strategies to create more cohesiveness between offices, including consideration of the following specific steps:

1. Establish regular leadership presence.
 - The incoming EPS and the EPD (Director) should schedule alternating monthly visits to the Las Vegas office to engage with staff, lead discussions, and reinforce unified leadership for both locations.
2. Organize cross-office team-building activities.
 - Facilitate quarterly in-person retreats or virtual team-building exercises that include all OIE staff, with opportunities to share updates, exchange ideas, and strengthen camaraderie across offices.
3. Redesign south office layout.
 - Evaluate the current setup of the south office to create a more cohesive working environment. Grouping desks or creating shared physical spaces could enhance collaboration and foster a stronger sense of teamwork.

4. Develop a north-south communication plan.
 - Create consistent communication channels, such as leveraging a Teams chat with regular updates on day-to-day developments or regular all-staff meetings, to ensure information flows equitably between locations.
5. Conduct regular feedback sessions.
 - Implement structured feedback mechanisms to monitor progress in building cohesion and to address any lingering concerns from staff in both offices.

These steps will leverage the incoming EPS's leadership to address the divide between north and south, building upon the strong team culture that exists aside from this addressable geographic challenge.

FISCAL IMPACT

Incremental Costs associated with this recommendation would primarily be driven by additional travel associated with establishing a leadership presence in the Las Vegas Office. We project \$12,000 per year, estimated to cover 12 four-day trips from Carson City to Las Vegas.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Increase in-person engagement with offices	(\$12,000)	(\$12,000)	(\$12,000)	(\$12,000)	(\$12,000)

SECTION 4.0: DIVISION OF EDUCATOR EFFECTIVENESS AND FAMILY ENGAGEMENT

DIVISION ORGANIZATION AND MANAGEMENT

Division of Educator Effectiveness and Family Engagement

The Division of Educator Effectiveness and Family Engagement (EEFE) is vital to Nevada Department of Education's (NDE) mission to enhance student achievement and educator effectiveness. As noted by the State Superintendent, it supports NDE's "renewed focus customer service to ensure that educators, schools, and families can trust and rely on NDE for expert guidance, meaningful support, and solutions that elevate outcomes for all students."

These efforts directly align with the six Statewide Plan for the Improvement of Pupils (STIP) values—equity, access to quality, success, inclusivity, community, and transparency—and contribute meaningfully to all six STIP goals.

Led by a Deputy Superintendent, EEFE oversees a diverse portfolio of responsibilities organized across three Offices:

1. **Office of Career Readiness, Adult Learning, and Education Options (CRALEO):** This office focuses on expanding opportunities for students to gain skills through career and technical education (CTE), adult education programs, and innovative education pathways. CRALEO plays a vital role in preparing Nevada students for workforce success and lifelong learning.
2. **Office of Educator Development, Licensure, and Family Engagement (EDLiFE):** This office is responsible for licensing educators, promoting professional development, and fostering family engagement to support student achievement. EDLiFE also works closely with the Commission on Professional Standards in Education (COPS) to establish licensure regulations and pathways for educators in Nevada.
3. **Office for a Safe and Respectful Learning Environment (OSRLE):** This office is dedicated to ensuring the physical and emotional safety of students in Nevada schools. OSRLE supports anti-bullying initiatives, mental health programs, and restorative practices to create welcoming and inclusive school environments.

The Division is supported by staff who work across these offices to advance the goals of the Division and meet the needs of educators, students, and families. The EEFE high-level organizational structure alongside the two other NDE Divisions is outlined in **Exhibit 4-1** below.

EXHIBIT 4-1

NDE DIVISIONS, OFFICES, AND PROGRAMS



Budget Overview

Exhibit 4-2 shows the division's budget for FYs 2024 and 2025.

EXHIBIT 4-2
BUDGET FOR DIVISION OF EDUCATOR EFFECTIVENESS
AND FAMILY ENGAGEMENT

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

In addition to the budget codes shown above, the salary and benefits of the Deputy Superintendent is paid through the Office of the Superintendent's budget. Every division also had COVID-19 funds that were typically used to fund contract positions and other one-time expenditures related to the additional work needed to administer programs during the pandemic.

OFFICE OF EDUCATOR DEVELOPMENT, LICENSURE AND FAMILY ENGAGEMENT

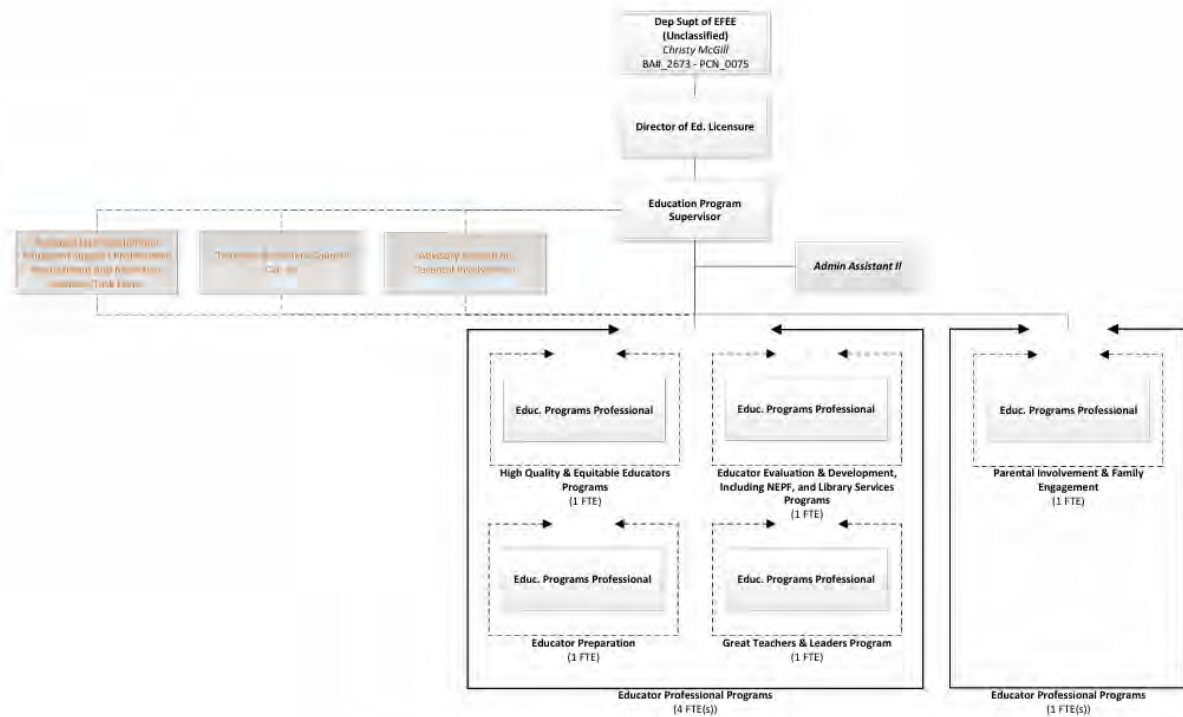
The Office of Educator Development, Licensure, and Parental Involvement and Family Engagement (EDLiFE) is under direction of the Educator Effectiveness and Family Engagement Division. The EDLiFE office consists of three programs:

- **Educator Development Support**—this team leverages and bolster human capital to improve student outcomes. The team supports initiative that develop, inspire, and recognize adults who work with students every day.
- **Licensure** is the main point of contact for most educators with the NDE. Licensure staff served approximately 60,000 licensed educators throughout Nevada processing approximately 20,000 applications for initial licensure, renewal, or additional endorsements each year. They also work with the Nevada Department of Public Safety to ensure background checks are completed and to investigate reports of misconduct by licensed educators.
- **Parental Involvement and Family Engagement**—this team actively promotes and supports the participation and engagement of families and communities in a child's education.

EDLiFE is also responsible for educator recruitment, retention, and recognition.

Exhibit 4-3 provides the organizational structure for the Educator Development Support and Family Engagement units within EDLiFE.

EXHIBIT 4-3
EDUCATOR DEVELOPMENT SUPPORT AND FAMILY ENGAGEMENT
ORGANIZATION STRUCTURE



Source: Nevada Department of Education, February 2025.

Units within EDLiFE work closely with external advisory groups. The main advisory group is the Nevada State Teacher and Education Support Professional Recruitment and Retention Advising Task Force.⁷⁴

The Nevada State Teacher and Education Support Professional Recruitment and Retention Advisory Task force is charged with evaluating and addressing the challenges of attracting and retaining teachers throughout Nevada. The Task Force, consisting of teachers and support professionals from each of Nevada's 17 counties, makes recommendations to the Joint Interim Standing Committee on Education (LCE) to address these challenges.

Every county school district has representation. Due to their student population, Clark County SD has three representatives, and Washoe CSD has two representatives.

The 16 members of the Teachers and Leaders Council are charged with making recommendations to the State Board relating to a statewide performance evaluation system that ensures that teachers, administrators, counselors, librarians, and other licensed educational personnel employed by school districts are evaluated using multiple, fair, timely, rigorous, and valid methods including evaluations based on student achievement data; that they are given a meaningful opportunity to improve their effectiveness through professional development; and that they are provided the means to share effective educational methods with their peers. The Council also develops and recommends a plan for

⁷⁴ <https://doe.nv.gov/boards-commissions-councils/nevada-state-teacher-and-education-support-professional-recruitment-and-retention-advisory-task-force>.

the development and implementation of the performance evaluation system, a process for peer evaluations of teachers, and the role of professional standards for educators.⁷⁵

Of the 16 members serving on this council, 12 are appointed by the Governor, three by the State Superintendent, and one by the Chancellor of Higher Education. Representation includes four teachers, two school administrators, and two trustees from local school boards. Additionally, there is one person representing a superintendent, a parent, an educational professional other than a teacher, and a representative from the Regional Professional Development Program.

Staffing

The Educator Development Support and Parent Involvement and Family Engagement units have seven staff positions. The director of Educator Licensure reports directly to the Deputy Superintendent of Educator Effectiveness and Family Engagement. Reporting to the Director of Educator Licensure is one Education Program Supervisor (EPS) who in turn supervises five Education Program Professionals (EPPs); four EPPs are assigned to Educator Development Support and one EPP is assigned to Parental Involvement and Family Engagement. There is also one Administrative Assistant II.

The major responsibilities of each EPP are summarized below to provide an understanding of their duties:

- EPS—Provides guidance to EPPs to ensure alignment of work and is the direct contact for the external advisory groups.
- EPP 1—Oversees the educator evaluation and development including work on the NV Education Performance Framework and library services.
- EPP 2—Coordinates employee recognition programs including the US Teacher of the Year, the Governor’s Office, educator surveys, and NV Purple Star Program.
- EPP3—Oversees high quality and equitable programs for educators— Title II, Part A.
- EPP 4—Manages educator preparation programs, continuing education and \$15 million in educator scholarships.
- EPP 5—Facilitates work with community organizations as part of Parental Support and Family Engagement; collaborates with the Advisory Council on Parental Involvement to develop legislative report.

Educator Development Support

The unit is responsible for providing resources for the NDE, local school districts, and charter schools to attract, prepare, train, recruit, develop, and retain teachers, principals, and other school leaders to ensure that all students have access to effective, high-quality, and experienced educators. Federal dollars support allowable activities as defined by the Elementary and Secondary Education Act, and General Fund appropriations are used for review and evaluation of traditional and alternative route to licensure preparation programs as well as development, implementation, and monitoring of the statewide

⁷⁵ Teachers and Leaders Council <https://doe.nv.gov/boards-commissions-councils/teachers-and-leaders-council/>, 2024.

performance evaluation system known as the Nevada Educator Performance Framework in accordance with state law.

Budget and Staffing

As shown previously in the organization chart, Educator Development Support is one of three units organized under the Director of Educator Licensure and supervised by the designated EPS. Of the four EPP positions, one is funded through the Educator Licensure Budget Code (2705) all other EPPs and costs for Educator Development are funded through Budget Code 2612 – Educator Effectiveness.

Exhibit 4-4 shows the Educator Effectiveness Budget (Budget Code 2612) for FY 2024 and FY 2025. As shown, the majority of the budgeted expenditures are federal dollars that flow through NDE to fund Teacher Quality initiatives.

EXHIBIT 4-4 EDUCATOR DEVELOPMENT AND EDUCATOR LICENSURE BUDGETS FY 2024 AND FY 2025

2612 – Educator Effectiveness	Category	Tot FY 2024	Tot FY 2025
1	Personnel Services	\$663,197	\$639,716
3	In-State Travel	\$2,581	\$3,381
4	Operating	\$3,601	\$3,601
11	Financial Literacy Ab543	\$9,760	\$9,760
12	Indirect Cost	\$71,149	\$111,594
14	Teacher Of The Year	\$7,751	\$7,751
15	Science Computer Education Monitoring	\$6,278	\$6,278
16	Travel Costs For Nvtesprra Task Force	\$5,998	\$5,998
18	Travel Costs For Commission On laeie	\$12,500	\$12,500
19	Comm Innov Excel In Educ	\$250,000	\$135,100
21	NV Institute Teach Educ Prep	\$1,500,000	\$1,097,737
22	Nitep Admin	\$73,554	\$74,054
26	Information Services	\$5,003	\$4,998
29	Teachers & Leaders Council	\$4,395	\$4,395
32	Teacher Quality - State Prog 84367	\$1,370,638	\$429,039
33	Teacher Quality - Leadership 84367	\$1,114,712	\$433,140
34	Teacher Quality - Admin 84367	\$257,791	\$14,145
35	Teacher Quality - Ats 84367	\$31,451,861	\$14,308,791
58	Computer Replacement Sb500	\$7,212	\$7,212
82	Department Cost Allocation	\$1,747	\$1,747
87	Purchasing Assessment	\$275	\$275
88	Statewide Cost Allocation Plan	\$19,894	\$19,682
93	Not Described	\$84	\$5,270
	Total 2612 0 Educator Effectiveness	\$36,839,981	\$17,336,164
2705 – Educator Licensure	Category	Tot FY 2024	Tot FY 2025
1	Personnel	\$1,874,573	\$1,651,219
2	Out-Of-State Travel	\$6,249	\$6,249
3	In-State Travel	\$10,783	\$10,783
4	Operating Expenses	\$172,582	\$162,292
8	Licensure System	\$148,320	\$149,160

2705 – Educator Licensure	Category	Tot FY 2024	Tot FY 2025
9	Professional Standards Commission	\$1,603	\$1,603
10	Microcredentialing	\$0	\$500,000
11	Ed Preparation	\$15,824	\$15,824
12	Indirect Costs	\$170,738	\$111,054
26	Information Services	\$25,517	\$17,813
40	Fingerprint Fees	\$560,361	\$560,361
82	Department Cost Allocation	\$5,822	\$5,822
86	Reserve	\$2,355,594	\$2,173,366
87	Purchasing Assessment	\$174	\$174
88	Statewide Cost Allocation Plan	\$12,476	\$12,306
	Total 2705 – Educator Licensure	\$5,360,616	\$5,378,026

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

FINDING

Staff within Educator Development Support continue to work diligently despite vacancies which were only recently filled.

There are seven staff members in this small program of Educator Development, Support, and Family Engagement. At the time of the interviews, the EPP position for Parental Involvement and Family Engagement had been in place only since April 2024. The second EPP under Educator Development and Support remains vacant.

During interviews, the Public Works team noted that despite vacancies, the remaining EPPs maintained a positive attitude, indicating that they felt the work they were doing was important. All interviewees said they think about students first and how decisions impact them.

Staff said they are looking forward to and are not afraid to be innovative. The Multi-Tiered System of Support is progressing, and surveys are in the works. They believe that the implementation of competency-based education is going well. This small group also maintain respectful communications and relationships with the external advisory groups.

COMMENDATION 4-A:

The Office of Educator Development Support is commended for their diligence in maintaining current programs and implementing new programs with a positive attitude despite vacancies.

Educator Licensure Program

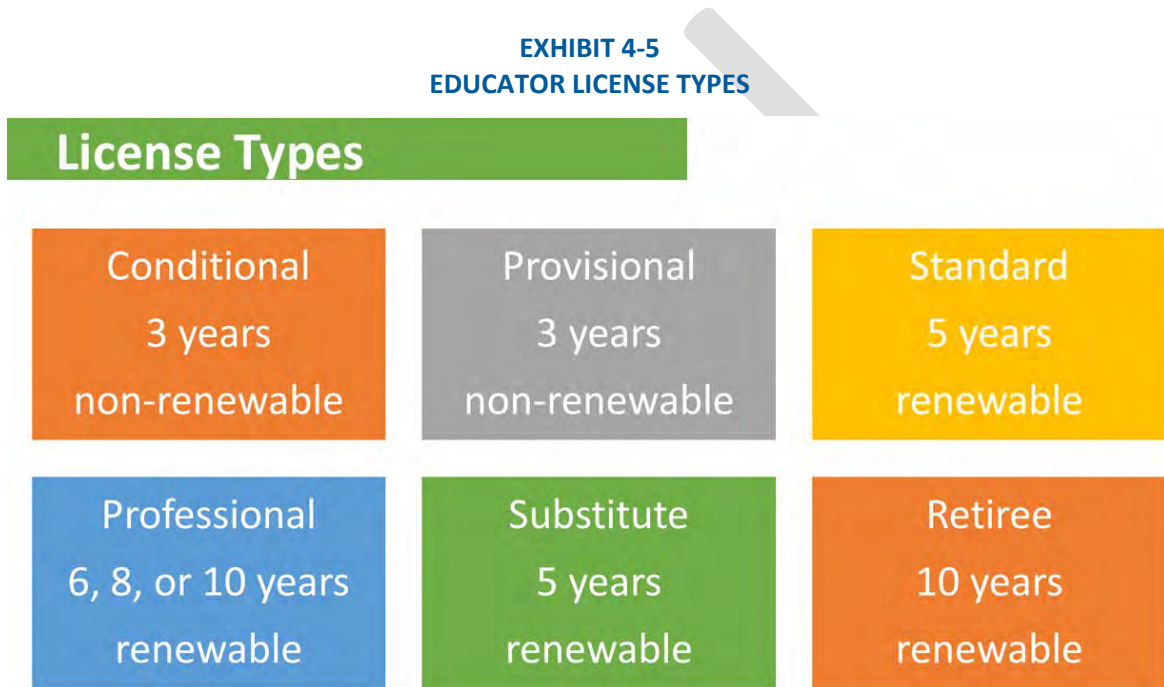
Overview

Educator Licensure makes up one of three programs within the Office of Educator Development, Licensure, and Family Engagement (EDLiFE). EDLiFE is one of three offices within the Educator Effectiveness and Family Engagement Division (EEFE). EDLiFE works to support the adults in Nevada's education system through educator licensure, evaluation, and professional development, and well as parental involvement and family engagement. Within EDLiFE, the Educator Licensure program is responsible for ensuring the qualifications of educators, school social workers, principals, and other licensed educational personnel that teach in Nevada's public schools.

The work of the Educator Licensure program most directly aligns with Goal 2 of the Nevada Statewide Plan for the Improvement of Pupils (STIP) – that “All students have access to effective educators.” (<https://doe.nv.gov/about/strategic-improvement-plan>). Within this goal, Ed Licensure most directly supports the following three STIP values through the strategies that follow (as noted in the STIP):

- Equity - Ensure effective educators in low-performing schools.
- Success - Decrease licensed educational personnel vacancies.
- Community - Increase candidates in the educator pipeline.

Ed Licensure supports this endeavor through the issuance of six broad license types, as shown in **Exhibit 4-5** below.



Source: <https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/30901>.

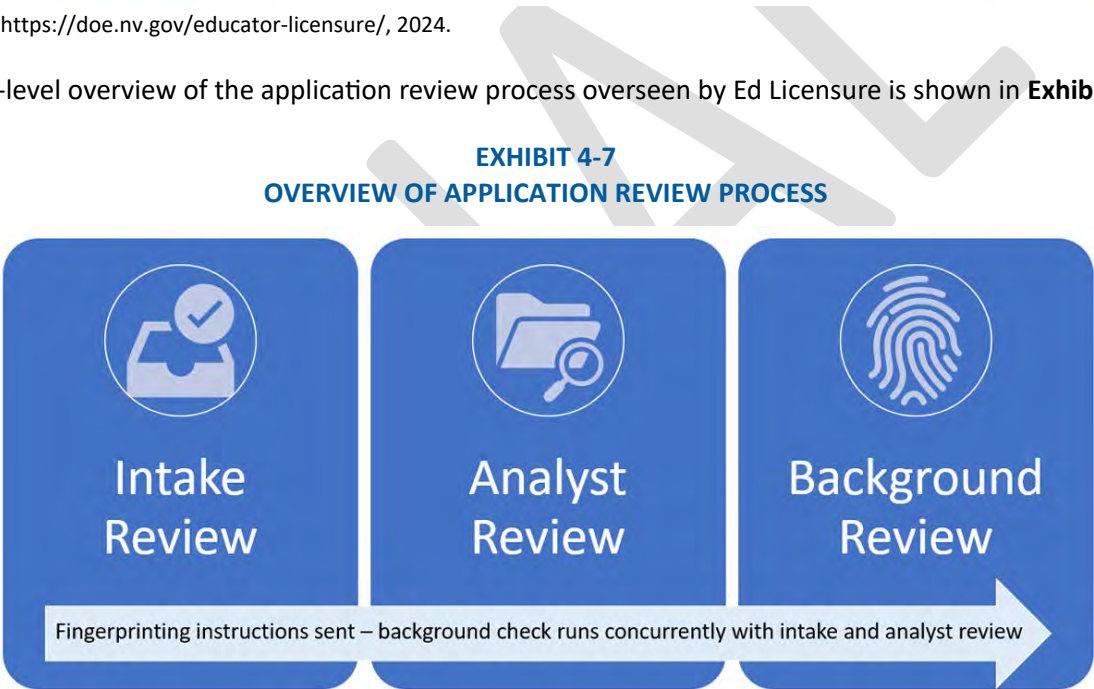
Additionally, Educator License oversees the issuance of endorsements across 17 licensure areas, categorized as standard licenses, special licenses, and licensed personnel, as shown in **Exhibit 4-6**.

EXHIBIT 4-6
LICENSES OFFERED

Standard Licenses	Special Licenses	Licensed Personnel
<ul style="list-style-type: none">• Early Childhood• Special Education• Elementary School• Middle/Jr. High School• Secondary/High School• Substitute/Emergency Sub	<ul style="list-style-type: none">• ARL Licenses• Career & Technical Education Licenses• Special Licenses/Endorsements• Library Media Specialists• Reading Specialists	<ul style="list-style-type: none">• School/Program Administrators• School Counselors• School Psychologists• School Nurses• School Social Workers• Speech and Language Pathologists

Source: <https://doe.nv.gov/educator-licensure/>, 2024.

A high-level overview of the application review process overseen by Ed Licensure is shown in **Exhibit 4-7**.



Source: Office of EDLiFE, Educator Licensure Program, October 2024.

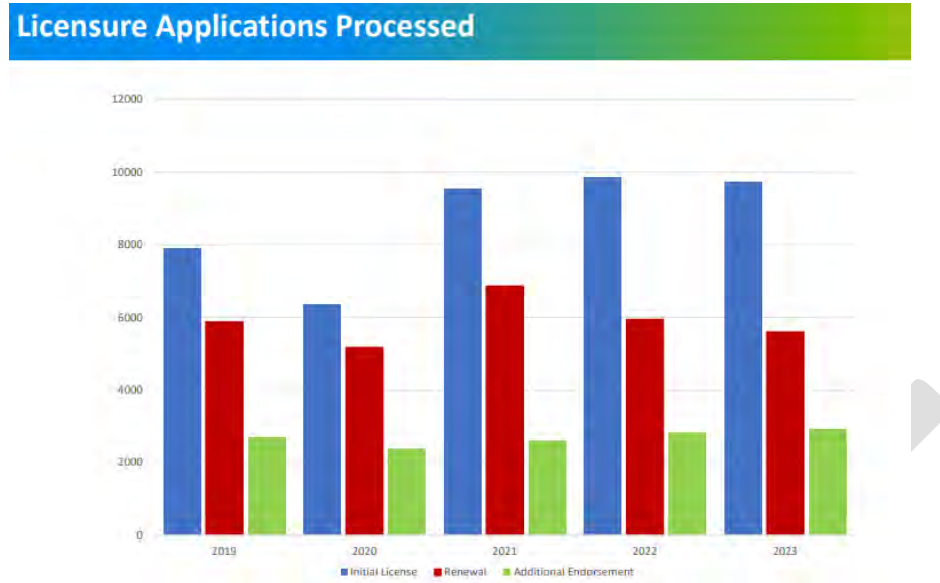
The three steps above are overseen by three distinct teams within Educator Licensure. These teams will be outlined in more detail in discussing team structure later in this overview section.

Processing times for licensure applications vary depending on multiple factors, including but not limited to, the time of year that the application is submitted, current application volume, and if a background check is required for the application. Typical time frames range from four to six weeks, with some applications taking up to six weeks. If a background check is required, the application processing may take longer. Background checks are completed through the FBI and Department of Public Safety.

Application volume is shown in **Exhibit 4-8**. As shown in the chart, application volume has exceeded 18,000 applications in each of the most recent three years – 2021, 2022, and 2023. As of October 2024,

applications for 2024 were tracked to exceed 2023 applications by approximately 1,500 per data provided by the Educator Licensure.

EXHIBIT 4-8
LICENSURE APPLICATIONS PROCESSED BY YEAR, 2019-23



Source: <https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/30901>, 2024.

Licensure operations are fee funded. Additional endorsements typically allow a licensed educator to teach in additional subject areas or grade level beyond their initial certification. Fees for licensure are shown below, in **Exhibit 4-9**.

EXHIBIT 4-9
NON-REFUNDABLE FEES FOR LICENSURE

- \$200.00 – New Applications (or reapplying of previous/expired licenses).
- \$170.00 – Renewals of current licenses and can be done up to nine (9) months prior to the expiration of the current license.
- \$70.00 – Additional Endorsements for each endorsement added to the base license.
- \$30.00 – Extensions on current licenses are available one (1) time per licensure period for an automatic six (6) months.

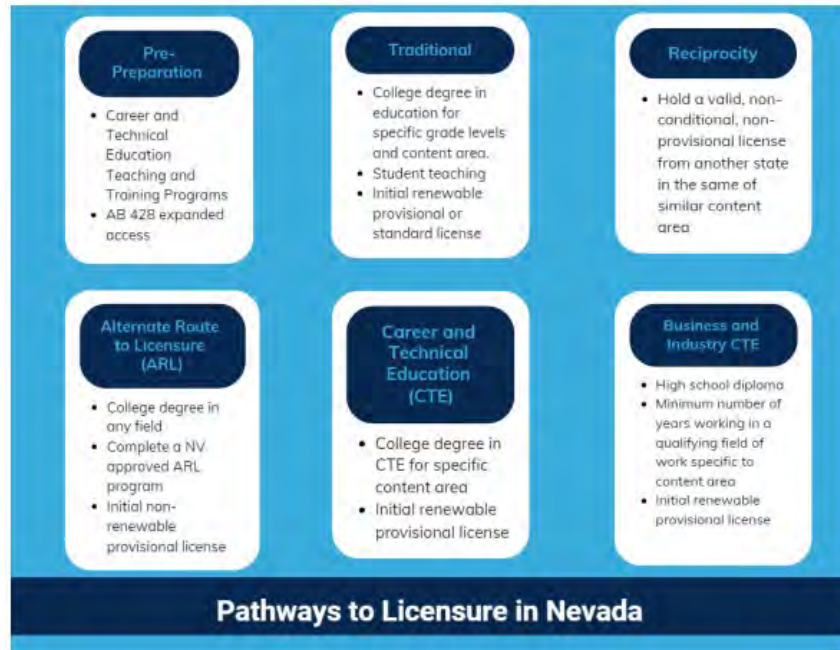
Source: <https://doe.nv.gov/educator-licensure/general-license-requirements-and-fees>, 2024.

Per NAC 391.045, ALL licensing fees are nonrefundable.

License applications are completed and tracked through the Online Portal for Applications and Licensure (OPAL), accessed here: <https://doe.nv.gov/educator-licensure/online-portal/>. The portal facilitates communications with applicants. In addition, in both the Carson City Main and Las Vegas Offices, members of Ed Licensure staff provide direct, in-person customer service to current and prospective licensees.

Ed Licensure recognizes six high-level pathways to initial certification, as shown in **Exhibit 4-10** below.

EXHIBIT 4-10
NEVADA'S PATHWAYS TO INITIAL CERTIFICATION



Source: <https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/30901>, 2024.

Educator Licensure follows licensure regulations and statutes as defined by Nevada Administrative Code (NAC) and Nevada Revised Statutes (NRS). These are noted in **Exhibit 4-11**.

EXHIBIT 4-11
CURRENT LICENSURE REGULATIONS AND STATUTES

Nevada Administrative Code (NAC)

- NAC 391.010 to 391.085 – General Provisions
- NAC 391.087 to 391.089 – Early Childhood
- NAC 391.0896 to 391.0897 – Substitute
- NAC 391.090 to 391.113 – Elementary & Middle
- NAC 391.120 to 391.136 – Secondary
- NAC 391.146 to 391.158 – Exceptions
- NAC 391.160 to 391.171 – Administrative
- NAC 391.179 to 391.332 – Special Endorsements
- NAC 391.3393 to 391.398 – Special Education
- NAC 391.400 to 391.436 – Career & Technical Education
- NAC 391.461 to 391.470 – Alternative Route
- NAC 391.480 to 391.485 – Arrest of Licensed Employees
- NAC 391.500 to 391.555 – Suspension or Revocation
- NAC 391.556 to 560 – Courses of Study and Training

Nevada Revised Statutes (NRS)

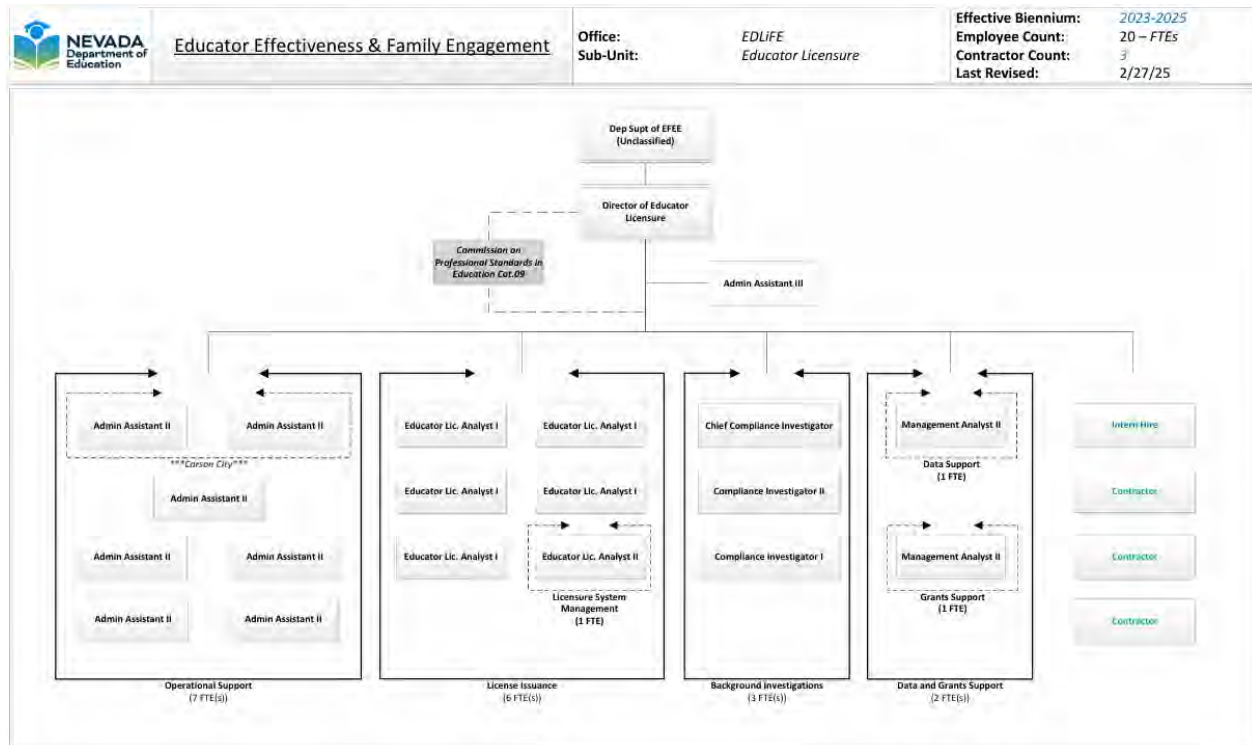
- NRS 391.002 to 391.0088 - Definitions
- NRS 391.009 to 391.029 – Commission
- NRS 391.031 to 391.051 – Licensing
- NRS 391.053 to 391.059 – Criminal Cases
- NRS 391.100 to 391.155 – Employment
- NRS 391.301 to 391.309 – Suspension & Termination
- NRS 391.320 to 391.361 – Suspension & Revocation

Source: <https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/30901>, 2024.

Organization and Management

As noted previously, the Office of EDLiFE has three offices: 1) Educator Licensure; 2) Educator Development, Support, and 3) Family Engagement; and Parental Involvement and Family Engagement. **Exhibit 4-12** below shows the current organizational structure of the Educator Licensure.

EXHIBIT 4-12
EDUCATOR LICENSURE ORGANIZATIONAL STRUCTURE



Source: Nevada Department of Education, February 2025.

There are three teams within Educator Licensure which align with the three steps in the application review process shown previously. The two management analysts and contractors support the entire team. The Operational Support team (seven customer service staff) conducts the initial intake review, the first step in the process. The License Issuance team of six license analysts completes the analyst review of all applications for completeness and to ensure that all necessary qualifications for licensure are met prior to issuing each license. In parallel with this process, the Background Investigations Team of three compliance investigators completes a background review. Each applicant for initial licensure or renewal completes a background check prior to receiving their license. The team works with the Department of Public Safety to ensure these checks are completed and investigate reports of misconduct by licensed educators.

In addition, two management analysts, three contractors, and one intern provide support to the entire Educator Licensure program.

The Educator Licensure Program includes 19 full-time staff, broken down as shown in **Exhibit 4-13**.

EXHIBIT 4-13
OFFICE OF EDUCATOR LICENSURE STAFFING

Department Position	Positions Filled	Positions Vacant	Total Positions
Director and Administrative Support	2	0	2
Director of Educator Licensure	1		1
Administrative Assistant III	1		1
Operational Support	7	0	7
Administrative Assistant II	7		7
License Issuance	5	1	6
Educator License Analyst I	4	1	5
Educator License Analyst II	1		1
Background Investigations	3	0	3
Chief Compliance Investigator	1		1
Compliance Investigator II	1		1
Compliance Investigator I	1		1
Data and Grants Support	2	0	2
Management Analyst II	2		1
Total	19	1	20

Source: NDE Organizational Chart, February 2025.

Note that the numbers for individual roles in the chart roll up to the five higher-level headings shown in bold (Director and Administrative Support, Operational Support, License Issuance, Background Investigations, Data and Grants Support). Thus, the total sum of positions for the Educator Licensure Program can be derived from adding the numbers in bold.

Commission on Professional Standards in Education

The Educator Licensure program works in conjunction with the Commission on Professional Standards in Education (COPS). COPS is the only regulatory commission, appointed by the Governor, that sets licensure standards for educational personnel. It develops regulations based on accepted standards for professional staff in schools and governing examinations for the initial licensure of teachers and other educational personnel. COPS, with Department support, conducts partner work groups and public workshops and hearings to consider these regulations. Adopted regulations are sent to the State Board of Education for approval before being sent to the Legislative Commission for consideration and final adoption. Its membership reflects key components of the educational establishment. Of particular interest to COPS is ensuring that Nevada's educators are both highly qualified and highly effective in the education of Nevada's students.

The mission of COPS is to create rigorous regulations for the licensing of educational personnel in the state of Nevada with the overall goal of contributing to the professionalism of educators through its selection of educator testing instruments and facilitating a quality education for all students.

The Director of the Office of Educator Licensure serves as the Board Secretary for COPS. The 13 members of COPS, as of September 30, 2024, are shown in **Exhibit 4-14** below.

EXHIBIT 4-14
COMMITTEE ON PROFESSIONAL STANDARDS IN EDUCATION MEMBERSHIP

#	Member	Title	Voting	Appointed By	Representing	Term Expires	E-Mail	Location
1	Kenny Belknap	Member	Y	Governor, nominated by majority teacher organization	Holds a license to teach secondary education and teaches in a secondary school	1st Term 6/30/2024	belknapk2@gmail.com	Clark County
2	Hope Blinco	Member	Y	Governor, nominated by NASS	Chief human resource officer of a school district in which more than 40,000 pupils are enrolled	1st Term 10/31/2025	blinco.hope@nvmscsd.org	Mineral County
3	Shartriya Collier	Member	Y	Governor	Dean of the school of education at Nevada State University or Great Basin College or their designee	1st Term 10/31/2026	shartriya.collier@nevadastate.edu	Clark County
4	Meredith Freeman	Member	Y	Governor, nominated by Nevada PTA	Parent or legal guardian of a student attending a public school	1st Term 5/31/2025	mcinnv@aol.com	Clark County
5	Jason Ginoza	Member	Y	Governor nominated by NASS	Chief human resource officer of a school district in which 40,000 or fewer pupils are enrolled	1st Term 10/31/2024	ginozjm@nv.ccsd.net	Clark County
6	Michele Haugen	Member	Y	Governor, nominated by majority teacher organization	Holds a license to teach early childhood education and teaches early childhood education	1st Term 6/30/2027	mhaugen@washoeschools.net	Washoe County
7	Jamie Hawkins	Member	Y	Governor, nominated by majority teacher organization	Holds a license to teach middle or junior high education and teaches in a middle or junior high school	1st Term 6/30/25	jamie.hawkins@washoeschools.net	Washoe County
8	VACANT	Member	Y	Governor, nominated by majority teacher organization	Holds a license to teach special education and teaches special education			
9	Joseph Morgan	Member	Y	Governor	Dean of the College of Education at an NSHE university or their designee	1st Term 6/30/25	joseph.morgan@unlv.edu	Clark County
10	Derild Parsons	Member	Y	Governor, nominated by NASS	Superintendent of schools of a school district	1st Term 6/30/2025	parsonsd@churchillesd.com	Churchill County
11	Amy Rozar	President	Y	Governor, nominated by majority administrator organization	Administrator of a school employed by a district or charter and works at the school level	1st Term 6/30/25	docktac@nv.ccsd.net	Clark County
12	Christina Tucker	Member	Y	Governor, nominated by majority, teacher organization	Holds a license to teach elementary education and teaches in an elementary school	1st Term 6/30/2024	etucker@washoeschools.net	Washoe County
13	Jordan Wenger	Member	Y	Governor, nominated by majority professional organization	School counselor, psychologist, speech-language pathologist, audiologist, or social worker, licensed and employed by a district or charter	1st Term 6/30/25	wengejl@nv.ccsd.net	Clark County

Source: COPS Member Listing Webpage, 2024.

Partnerships

Educator Licensure has established and maintained partnerships with several education community organizations and stakeholders, with the goals of streamlining licensing processes, eliminating potential barriers to licensure, providing educators development and support, and finding creative solutions to statewide educator shortages and retention issues. Educator Licensure works productively with Nevada institutions of higher education; approved alternative route to licensure providers; Local Education Agencies (LEAs); state and local education associations; the Nevada Association of School

Superintendents (NASS); The Public Education Foundation; The Leadership Institute of Nevada, Mindful SEAD (Social, Emotional, and Academic Development); Nevada Chapter of State Teachers of the Year; and advisory groups such as the Teachers and Leaders Council, Nevada Early Childhood Advisory Council, Advisory Council for Family Engagement, and Commission on Professional Standards in Education (COPS).

The Nevada Coalition for Educator Retention and Recruitment collaborates with human resource officers of each Nevada school district, outside research agencies, and other state education departments to be able to inform NDE of trends, best practices, and recommended areas of support for statewide recruitment and retention.

The Educator Licensure background investigations team has forged a solid working relationship with the Nevada Department of Public Safety's Records, Communications and Compliance Division (RCCD), and has worked extensively with RCCD staff to draft legislative changes that will bring NRS 391.033 into compliance with federal regulations governing non-law enforcement use of fingerprint based criminal history reports. Investigations staff are also collaborating with RCCD in support of implementation of RCCD's ongoing computer system upgrade, which, when completed, will have a significant positive impact on background processing times for prospective educators.

FINDING

The Director of the Office of Educator Development, Licensure, and Family Engagement (EDLiFE) directly supervises 18 staff members, with 17 of them focused on Educator Licensure. This reporting structure and span of control limits the Director's capacity for overall office oversight and reduces the task-level supervision and guidance available to individual team members, limiting the efficiency of Educator Licensure.

The formal classification specification title for the role highlighted in this finding is Educator Licensure Director. For the purpose of this finding, we will use the working title of Director of EDLiFE, which recognizes that the director's office spans beyond Educator Licensure to also include Educator Development, Support, and Family Engagement.

The Office of EDLiFE includes: 1) Educator Licensure and 2) Educator Development, Support, and Family Engagement as previously shown in **Exhibit 4-3** and **4-12**.

The Educator Development, Support, and Family Engagement includes an Education Program Supervisor in the reporting structure between the Director of EDLiFE and the rest of the staff. This enables the Director to focus on high-level oversight—such as strategy, policy, and long-term planning for Educator Development, Support, and Family Engagement. Educator Licensure, on the other hand, does not include this additional supervisory layer between the Director and 17 staff members. According to industry standards, the appropriate span of control is between 7-10 direct reports.

This expansive span of control results in two challenges for the Director and staff that both combine to the detriment of Educator Licensure and the team's ability to serve Nevada educators, informed through staff Interviews with Office of Educator Licensure:

1. The director's capacity to focus on high-level oversight of the office is hindered. The director should be empowered to focus on leading director-level work, which includes the following responsibilities, according to staff interviews:

- a. Set vision and strategy for the office and develop a roadmap of work ahead for the team to implement strategy in fulfillment of the vision.
- b. Work with the [Commission on Professional Standards in Education](#) (COPS) as the Board Secretary to set forward-looking licensure standards for educational personnel to ensure that Nevada's educators will be highly qualified and effective in the education of Nevada's students. Note that this work is extensive and dynamic in the face of continuous changes in educator supply and demand. In September of 2024, for example, [13 new regulations](#) were adopted by COPS. This is an annual endeavor, with new regulations being adopted in each of the last four years. As Board Secretary, the Director leads monthly meetings in support of this work.
- c. Work with the State Board of Education for approval of regulations adopted by COPS.
- d. Develop an implementation pathway for newly approved regulations that includes advance training for internal staff together with external-facing communications and technical assistance.
- e. Oversee and shape the high-level workflow of the educator licensure team and direct resources to ensure timely and efficient processing of more than 20,000 applications annually.
- f. Work with Higher Education (HE) programs (i.e., schools of education) on program approvals to ensure a strong supply of educators that meet the growing needs of Nevada schools and students. Work with HE programs, through technical assistance, to ensure that educators will be positioned to navigate the educator licensure process successfully and efficiently. Communicate program approvals and alignment with specific certifications to internal team in advance of roll-out.
- g. Develop the Educator Licensure team and address high level human capital challenges and needs.

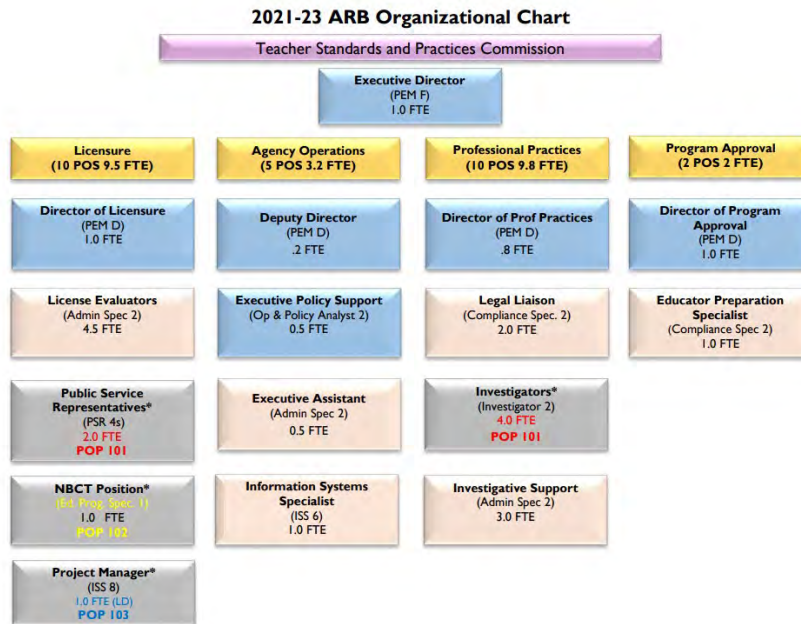
With the Director's current reporting structure, overseeing all these leadership responsibilities while also supervising 22 direct reports has been problematic. Specifically, challenges with (d) and (f) above have been cited as impeding the ability of staff to efficiently process applications without undue delay and escalation of problems.

2. The Director's ability to deliver task-level supervision and guidance to individual team members is limited. This reality reflects an org-structure challenge. It does not reflect on the current Director's commitment to the team and their work, which has been consistently commended in staff interviews. As is, team members indicate that they often have decisions that must be escalated but are delayed while the Director is focused on the high-level demands of the role. Conversely, during peak application months, the Director is often pulled into task-level work in processing applications (i.e., responding to customer service issues) that detract from his ability to focus on high-level work.

Both challenges point to the need for an additional supervisory level role to make the span of control for the director more manageable. Such structure is seen in each of Nevada's selected peer states where Educator Licensure Organization Structure is evident. (Note: Fall 2022 student enrollment numbers are included in the peer references below for comparison to Nevada, with 484,130 students.)

In Oregon (587,564 students), for example, the Teachers Standards and Practices Commission (TSPC) has included three Directors reporting to the Executive Director as a layer between the ED and 21.5 FTEs, as shown below in **Exhibit 4-15**, Oregon’s 2021-23 organizational chart.

EXHIBIT 4-15
OREGON AGENCY REQUEST BUDGET (ARB) ORGANIZATIONAL CHART



Source: Teacher Standards and Practices (TSPC) 2021-23 Agency Request Budget, page 38.

In Utah (691,906 students), the Executive Coordinator of Education Licensing has a span of seven direct reports overseeing an additional 12 staff supporting educator licensure, as shown in **Exhibit 4-16** below, an excerpt from the Utah State Board of Education Organization Chart.

EXHIBIT 4-16
**UTAH STATE BOARD OF EDUCATION ORGANIZATION CHART,
FOCUS ON EDUCATOR LICENSING**



Source: <https://schools.utah.gov/orgchart>, captured November 2024.

Nevada's peer states have a supervisory layer between the leader of the office of educator licensure (or equivalent) and educator licensure staff. This comparison provides a strong indicator that Nevada's peer states have determined that a more layered organizational structure with a narrower span of control for the office leader proves to be more effective and efficient for serving their states' educator licensure needs.

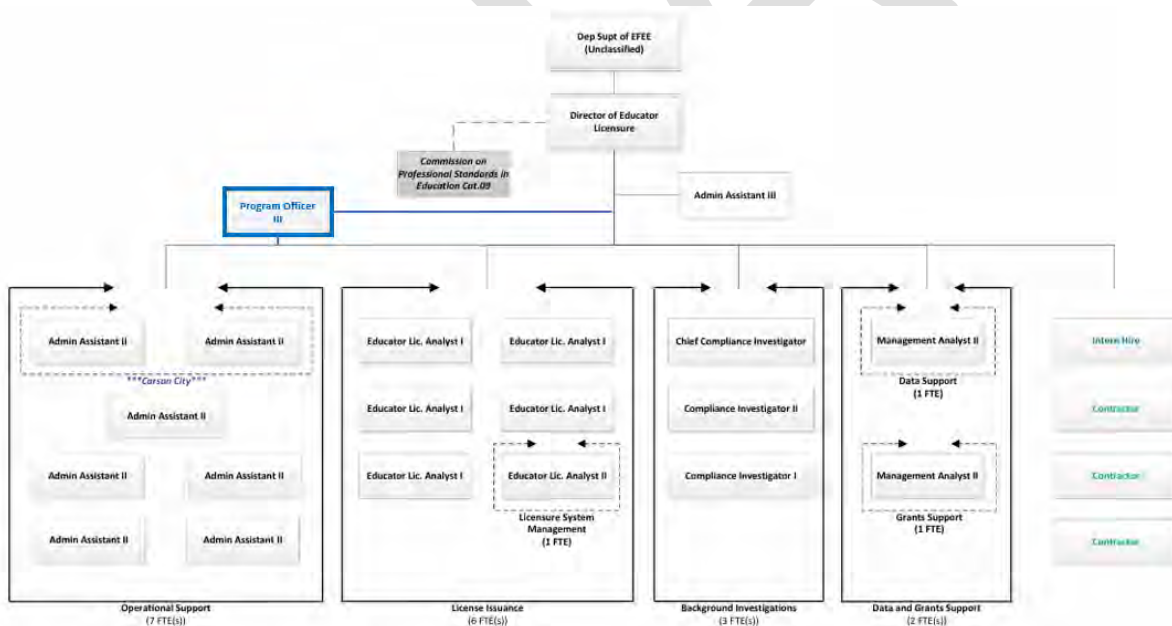
RECOMMENDATION 4-1:

Hire an Educator Licensure Manager, reporting to the Office Director, to oversee the Operational Support and License Issuance Teams.

The Class Spec Title of Program Manager III would be appropriate for this Educator Licensure Manager role. This new role would confer several advantages:

First, it would empower the Director to successfully focus on the high-level leadership outlined above. The Director's new span of control across Educator Licensure would decrease from 17 to five, freeing the director up to focus on the work that should define the role. This new structure is shown in the revised organization structure below in **Exhibit 4-17**.

EXHIBIT 4-17
NEWLY PROPOSED EDUCATOR LICENSURE ORG STRUCTURE



Source: Compiled by Public Works from Office level organization chart combined with **Recommendation 4-1**.

Note: In the newly proposed organization structure above, the proposed Program Officer III role, with accompanying reporting structure, is shown in blue.

Second, the new manager would be able to provide educator licensure staff with the support and direction that they need to navigate a high volume of educator licensure applications efficiently.

Third, it would allow another level of managerial problem-solving to help direct resources and adjust workflow during the summer surge in application volume. Given that the new role would be focused exclusively on the Operational Support and License Issuance units, the new manager would be able to

dedicate full attention to the workflow across both units. This should yield more efficient processing of applications throughout the year, particularly during the peak summer months when most applications are processed.

There are two functions in Educator Licensure that should continue to report to the Director: 1) Given the confidentiality and sensitivity of the work of the Background Investigations unit, we recommend that this team continue to report directly to the current director. 2) The two positions in the data and grants support function are removed from the licensure application pipeline and more connected to the high-level work of the director. Accordingly, they should also continue to report to the director.

To implement this recommendation, the Director should define the role of Educator Licensure Manager with a Class Spec Title of Program Officer III and gain clearance from the Deputy Superintendent and other NDE leadership as applicable to put forward a request to create and fill the position. In advance of posting the role, the Director should create a communication plan to share the plan with staff. In this way, the Director can address questions about the role directly with staff before they hear about it elsewhere first, forestalling uncertainty and associated speculation. The Director will create a recruitment and selection plan for the role and implement this plan together with Human Resources. Also, the Director should create an onboarding and training plan to help the first hire succeed and feel welcomed.

FISCAL IMPACT

The average salary for a Program Officer III is currently \$70,542. There may be savings stemming from more efficient processing of applications to offset this cost (with reduced overtime in peak months). But this potential savings is too speculative to definitively project. Assuming benefits of approximately 50 percent, the annual cost for filling this new position would be as follows:

Classification	Number of Positions	Annual Salary	Benefits @ 50% of Salary	Total Cost
Program Officer 3	1	\$70,542	\$35,271	\$105,813
Annual Total				\$105,813

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Hire an Educator Licensure Manager	(\$105,813)	(\$105,813)	(\$105,813)	(\$105,813)	(\$105,813)

FINDING

The summer surge in educator licensure application volume overwhelms processing capacity.

The licensure application pipeline experiences a significant surge during the summer months, leading to overwhelmed staff, extended processing times, and operational inefficiencies. Peak time for applications runs from May through September, with the height of activity in June and July. During this period, approximately 60-70 percent of annual applications are submitted, creating bottlenecks that result in processing delays and increased pressure on staff.

Licensure staff have worked diligently to manage the summer surge, often going above and beyond to ensure timely processing despite being stretched beyond capacity. Interviews revealed key challenges during the peak months:

- *"The summer months start in April. Right now, 300-350 applications are in each queue, with about 1,200 in each queue during summer."*
- *"OT [overtime] is new in the last year but wasn't available before. Even with overtime, there are more applications each year."*
- *"During summer, Ops support inbox is bonkers with random questions. 300 per day. Sometimes background presses in on that."*

Staff have demonstrated exceptional teamwork and dedication, often stepping outside their designated roles to help manage the surge. One staff member noted, "We work OT to help with backlog," while another commented, "We share everything. We work together to get through summer." However, these efforts are not sustainable in the long-term, and the application pipeline continues to be strained during peak periods.

COMMENDATION 4-B:

Licensure staff demonstrate remarkable dedication and teamwork during the summer surge, consistently rising to the challenge and supporting each other to ensure applications are processed.

Their "get it done" approach reflects their commitment to service. But such an approach is not sustainable, underscoring the need for systemic changes to alleviate the burden.

RECOMMENDATION 4-2:

Implement a holistic approach to increase capacity in peak months and shift application volume to other months.

A comprehensive strategy to handle the summer application volume should include:

- **Flexible staffing solutions:** Hire temporary staff to assist during peak months, focusing on processing straightforward applications (e.g., substitute licenses) and managing basic customer service tasks (e.g., emails). Temporary staff can manage simpler tasks, freeing permanent staff to focus on complex applications. Other states with similar seasonal surges have successfully used flex staff to clear backlogs.
- **Streamline workflows:** Batch applications by type and funnel less complex applications to less experienced or temporary staff. This should improve processing efficiency by allowing staff to focus on consistent approaches within a batch of similar applications. This approach would also free up more experienced staff to focus more intensively on more complex applications, such as those from international educators.
- **Incentivize off-peak applications:** Introduce an "early bird" discount for applications submitted before April to encourage educators to apply earlier in the year. Encouraging earlier submissions will distribute the workload more evenly throughout the year, reducing the summer strain.
- **Enhance communication:** Ramp up outreach to educators and higher education institutions to emphasize the importance of early application submission. Messaging campaigns could highlight consequences of late applications, such as delays in starting employment, educating

stakeholders about the application timeline to reduce last-minute submissions and associated delays.

- **Formalize training for temporary staff:** Develop structured training programs for flex staff to ensure they can efficiently handle assigned tasks and reduce the burden on permanent staff. Ensuring temporary staff are well-prepared increases their effectiveness and reduces onboarding time.

Immediate next steps to implement the holistic plan outlined above include:

1. **Hire and onboard temporary staff** during peak months to assist with basic customer service tasks and processing simple applications.
2. **Analyze and redesign workflows** to batch similar applications and implement automation tools for repetitive tasks.
3. **Develop and promote an early bird discount** to incentivize off-peak applications submitted before March 31 in any calendar year. A small incentive of a \$7 discount, for example, would signal the importance of applying earlier and provide a nudge to an adequate number of educators to shift application volumes to earlier months.
4. **Launch targeted outreach campaigns** to educators and higher education institutions, emphasizing the importance of early application submissions.
5. **Create and deliver structured training programs** for temporary staff to ensure their efficiency and preparedness before peak season.
6. **Partner with higher education institutions** to integrate early application awareness into teacher preparation programs.

FISCAL IMPACT

Temporary Staffing Costs: Hiring three temporary staff at \$25/hour for 20 hours per week over 12 weeks would result in a cost of \$18,000 annually. This staffing increase would provide critical support during the summer surge, addressing basic customer service needs and processing straightforward applications.

Early Bird Discount Impact: Offering an early bird discount of \$10 for 3,000 educators applying before April would result in an estimated revenue reduction of \$30,000. However, this incentive would help shift a significant portion of the application workload to off-peak months, alleviating summer pressures, decreasing overtime and flex staff pay, and improving overall processing timelines.

Net Fiscal Impact: While the combined estimated cost of \$48,000 annually (\$18,000 for temporary staffing and \$30,000 for the early bird discount) represents an investment, these measures are expected to yield operational efficiencies, reduce overtime costs, and enhance customer satisfaction, ultimately offsetting the initial expenditure over time. To be conservative, we are projecting the full cost of this investment across all five years. These costs may ultimately decline as efficiency improves and the need for expenditure on overtime decreases.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Implement a holistic approach to increase capacity in peak months and shift application volume to other months	(\$48,000)	(\$48,000)	(\$48,000)	(\$48,000)	(\$48,000)

FINDING

Feedback from districts indicates an opportunity for improvement in the service level provided by Educator Licensure to districts and their educators.

While the Educator Licensure team demonstrates a strong commitment to serving educators, as evidenced by their orientation toward Goal 2 of the Statewide Plan for the Improvement of Pupils (STIP), challenges remain in providing consistent and responsive support.

Sentiment indicating the team's commitment to serving educators was evident throughout staff interviews. Representative responses to the question of "Who is your primary stakeholder?" included:

- "Educators."
- "Primary customers are applicants for licensure."
- "Educators, licensed staff."

Another positive response is that many also highlighted children and students as key stakeholders whom they serve together. For example, a background investigations team member noted: "children, due to the connection to child safety."

COMMENDATION 4-C:

The Education Licensure team is committed to Goal 2 of the Statewide Plan for the Improvement of Pupils (STIP), that *All students have access to effective educators.*

This commitment represents an essential foundation to build on in addressing service challenges. There is opportunity for improvement, as LEA survey feedback and interviews reveal dissatisfaction with the level of customer service provided by Educator Licensure, stemming from limited communication channels and inconsistent support. Quantitative survey results indicate that only 23.3 percent of respondents rated services provided by Educator Licensure as "good" or "excellent," while 36.4 percent rated them as "fair" or "poor", as indicated by the results shown below in **Exhibit 4-18**.

EXHIBIT 4-18

LEA SURVEY EXCERPTS RELATED TO LEVEL OF EDUCATOR LICENSURE SUPPORT

How would you rate the level of support and services provided by the Educator Effectiveness & Family Engagement Division and its Offices of NDE to districts and charter schools?

Answered: 132 Skipped: 0

	EXCELLENT	GOOD	NO OPINION/ DON'T KNOW	FAIR	POOR	TOTAL
▼ Educator Effectiveness & Family Engagement Division as a whole.	0.76% 1	18.18% 24	56.06% 74	20.45% 27	4.55% 6	132
▼ Services provided by the Educator Licensure Office.	6.06% 8	16.67% 22	40.91% 54	25.00% 33	11.36% 15	132
▼ Services provided by the Family Engagement Office.	1.52% 2	15.15% 20	65.91% 87	12.88% 17	4.55% 6	132
▼ Services provided by the Safe & Respectful Learning Environment Office.	3.79% 5	19.70% 26	46.21% 61	22.73% 30	7.58% 10	132

Source: NDE LEA Survey Results, Public Works, November 2024.

Qualitative responses from the same LEA survey highlighted areas for improvement:

- "Educator Licensure is slow in processing and do not communicate with employees and applicants around needs."
- "It depends on what you need them for. If you need license support, it is so hard to get help."
- "Licensing is difficult. A call will be picked up but getting an answer to a question is not usually possible."

Additionally, Educator Licensure staff interviews reveal gaps in communication and support:

- "Not sure if there is an FAQ for how to check for deficiencies. Are we giving the best support on that? Not sure."
- "Right now, the biggest issue with comms with teachers is they only get part of the message. Something gets lost in the translation."

Furthermore, interviews revealed a gap in feedback channels to hear from applicants, indicating a missed opportunity to gain insight on areas to address:

- "There used to be a survey link in email signatures for feedback, but it was removed and never replaced."
- "Years ago, licensure did have a SurveyMonkey. Don't know where it went or where the data is. It was in signature lines. If we had staff to man it, this would be helpful to bring back."
- "There used to be a survey link when we sent an email. We never saw feedback, so we don't know if it was effective."

Interviews also indicated that there are opportunities to strengthen relationships with districts, which would benefit licensure applicants through better communication and more clear expectations

established together with districts that point educators to apply for licensure. This is particularly true with Clark County School District (CCSD), the largest district with the most expansive educator needs.

- *“CCSD sends people to get help with the apps, rather than giving them support on how to self-serve. So they flood the south office with walk-ins. Better to help teachers understand how to do it in OPAL. In the north, we do PD with districts so they can support teachers.”*
- *“For Internationals – CCSD is recruiting a lot. There can be a gap in terms of expectations re: what educators need to apply. Now there is a pipeline from Philippines to CCSD, and they’ve gotten better with that pipeline.”*
- *“If we could have better rapport with districts – would be good to meet with them to talk about what’s coming from all districts... meaning where applicants are coming from... setting expectations.”*

Based on this feedback, we see that there have been challenges in communications with districts. The feedback also reveals that there have been recent improvements in rapport with districts to continue building on.

There are a variety of factors to address in terms of improving the service level so that the team may build on their commitment to serve educators, ranging from improved communication, to implementing feedback loops, to caring for the educator’s application experience, to developing rapport with districts to set expectations for all parties involved in guiding teachers through the application process.

RECOMMENDATION 4-3:

Implement a plan to improve service levels and improve the educator licensure applicant experience.

To address the identified challenges, the Educator Licensure program should implement a holistic plan that enhances service quality for both educators and districts. This plan should include the following elements:

- **Conduct an educator experience audit:** Assess the educator experience across all touchpoints, including the OPAL platform, communication channels, and customer support processes. Use insights from this audit to inform improvements to the upcoming improved platform and overall educator support systems.
- **Reestablish feedback channels:** Reintroduce a regular feedback mechanism, such as a survey link in email signatures and post-application surveys upon resolution of each application. These tools should collect both quantitative and qualitative feedback to continuously refine service delivery and provide benchmarks to chart progress in service level. This would also address a concern addressed by licensure analysts, who indicated that “the only feedback we receive is from educators unhappy that we deny them.” It will be critical, moving forward, for all staff to hear feedback from a representative sample of applicants, not just those raising questions or complaints about negative outcomes.
- **Build bridges with districts:** Establish a core group of district representatives for regular monthly meetings to discuss service needs, share updates, and strengthen collaboration between Educator Licensure and districts. Each district should identify a designee who is attuned to educator pipelines to join this group.

- **Enhance communication:** Develop clear and user-friendly communication materials, such as FAQs and guidance documents, to address common questions and reduce confusion. Train staff to ensure consistent messaging across all interactions.
- **Leverage off-peak seasons for process improvements:** Use slower months to analyze feedback, test new communication strategies, and implement identified improvements to workflows and customer support processes.

Immediate next steps for implementation of the plan above should include the following:

1. Engage a user experience (UX) consultant to conduct an audit of the educator and district experience with Educator Licensure to refine the educator experience.
2. Reintroduce feedback channels by integrating survey links into email signatures and developing follow-up surveys for completed applications.
3. Establish a district advisory group to provide ongoing input on service improvements and facilitate stronger partnerships.
4. Create and distribute clear communication materials, including FAQs and step-by-step guides for educators and districts.
5. Allocate time during off-peak months to proactively and intentionally review feedback, streamline workflows, and test process improvements.

FISCAL IMPACT

The cost to implement this recommendation is estimated as a one-time expenditure of \$10,000 to hire an individual UX consultant on contract to perform a two-week audit of the educator experience as indicated in step 1. Other recommendations and implementation steps should be implementable at no incremental cost.

Accordingly, a projection for five-year fiscal impact would be as follows:

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Contract with UX consultant for audit of educator experience	(\$10,000)	\$0	\$0	\$0	\$0

FINDING

The OPAL platform, the licensing system used by the Educator Licensure program, has exhibited significant issues with stability, glitches, user experience (UX), and data access.

These challenges have impacted the program's ability to efficiently manage licensing processes and provide reliable service to educators and districts. Feedback from staff and stakeholders highlights the need for substantial improvements in these areas to better support users and ensure operational effectiveness. Evidence of current challenges with the existing platform, as related in staff interviews, includes the following quotes, organized by issue highlighted:

- **System stability:** *“OPAL crashed in 2019... we need to ensure redundancy and risk mitigation with the new platform.”*
- **Glitches and data reliability:** *“OPAL is glitchy, things disappear, we call it the Bermuda Triangle.”*
- **Data access issues:** *“Under the current system, you can run a report back-to-back and get different results on searchable data. Some fields aren’t even searchable.”*
- **User experience:** *“Licensing system now does not have easy access to points of data they need... that is a big factor in the need for a new system.”*

Despite these challenges, it is commendable that the Educator Licensure Office has recognized these deficiencies and taken steps to address them proactively.

COMMENDATION 4-D:

The Educator Licensure Office has demonstrated foresight and commitment to improvement by issuing an RFP for a new licensing platform. This initiative reflects the Office’s dedication to addressing systemic challenges and ensuring that future processes meet the needs of educators, analysts, and other key stakeholders.

The purpose of this finding is not only to commend the program for taking this essential step towards a new platform, but also to ensure that critical concerns highlighted in staff interviews will be kept top of mind through the contracting process and through implementation with the selected vendor.

RECOMMENDATION 4-4:

To ensure that the new licensing platform addresses existing issues and meets stakeholder needs, the Educator Licensing program, together with legal counsel (in contracting with the vendor), should ensure that concerns arising with the current licensing platform will be proactively addressed. Based on the nature of these concerns as described above, accomplishing this goal should include:

1. **Establish clear Service-Level Agreements (SLAs):** Define and enforce SLAs with the vendor to ensure system stability, data accessibility, and reliable performance. Redundancy measures should be included to prevent crashes similar to those experienced in 2019.
2. **Integrate insights from a UX audit:** Collaborate with the vendor to incorporate insights from the user experience audit recommended in **Recommendation 4-3**. The design process with the vendor should prioritize the needs of educators, internal Educator Licensure staff, and analysts accessing backend data.
3. **Ensure robust User Acceptability Testing (UAT):** Build comprehensive UAT into the development process to ensure that user stories are well-defined and that the platform is tested under real-world conditions. Involve diverse user groups, including educators, staff, and analysts, in the testing phase.
4. **Vendor collaboration on Quality Assurance (QA):** Maintain close collaboration with the selected vendor throughout the development process to proactively address potential issues and ensure adherence to user-centered design principles.

FISCAL IMPACT

Given that the RFP associated with this finding is already in place and that the new platform is already budgeted for, we see no incremental cost associated with this finding.

FINDING

Much of the training for licensure analysts and operations support staff is ad hoc, requiring extended learning pathways for new team members. This approach results in prolonged ramp-up times, estimated at eight months to a year, and creates additional capacity challenges when turnover occurs.

Evidence from staff interviews highlights the following:

- *"Learning curve is 8 months to a year. There has been high turnover over the last year for licensing technicians, though that's atypical."*
- *"(Colleagues) have given me some written guidance. Being proactive, I write instructions on my own too."*
- *"When starting out, I was able to handle challenging situations over time, or ask for help."*
- *"When (my colleague) is out, I tell them I'm new and when to come back to meet with them."*

COMMENDATION 4-E:

The licensure team demonstrates a strong culture of teamwork and mutual support, actively stepping up to train and guide each other. This collaborative spirit is commendable and underpins the team's dedication to ensuring operational continuity despite challenges.

The lack of formal training cited is not ideal, however. Efficiencies can be gained for both trainee and senior colleagues through set training approaches that are standardized for all new staff. Another advantage of such approaches is that they convey policies and procedures uniformly, which should save time and improve service delivery. As noted previously, training modules can also be used to efficiently prepare temporary staff to handle basic tasks such as basic application review and handling of emails.

RECOMMENDATION 4-5:

To address the challenges of ad hoc training and ensure long-term efficiency and service consistency, the Educator Licensure Office should develop a structured, proactive training plan to complement its current team approach.

This plan should include the following elements:

1. Develop comprehensive training modules: Create standardized training materials and modules during the off-peak season to support consistent onboarding. These should cover core processes, policies, and common scenarios new staff are likely to encounter.
2. Formalize a mentorship system: Pair new hires with experienced team members who can provide hands-on guidance and answer questions during their initial months.
3. Incorporate shadowing opportunities: Designate time for new staff to observe seasoned employees managing complex tasks to gain practical insights and confidence.
4. Create a knowledge repository: Develop a centralized digital repository with detailed documentation, FAQs, and guides that staff can easily reference for support.
5. Implement periodic training refreshers: Conduct regular training sessions to reinforce skills and address new developments in licensing procedures or policy changes.

6. Continuously update training standard operating procedures (SOPs) when regulations and policies change.

Implementing a structured training program will provide the following benefits:

- Reduce the learning curve for new hires, allowing them to become productive more quickly.
- Minimize reliance on experienced staff for ongoing ad hoc support, freeing them to focus on their primary responsibilities.
- Enhance consistency and quality of service by ensuring all team members are trained to the same standards.
- Mitigate service gaps caused by turnover, as new staff will have a clear, replicable pathway to success.

To implement this recommendation, the staff should:

1. Audit current training practices: Identify gaps and strengths in the existing onboarding and training processes.
2. Develop training content: Collaborate with experienced team members to create modules, guides, and documentation during the off-peak season.
3. Launch the mentorship program: Pair new hires with mentors and outline clear roles and expectations for both parties.
4. Establish a digital knowledge base: Use internal platforms to host training materials, ensuring they are easily accessible.
5. Schedule refresher training sessions: Plan biannual sessions to reinforce knowledge and address updates.
6. Incorporate adjustments to training as an implementation step whenever regulations and policies change.

FISCAL IMPACT

Developing the proposed training program will require staff time during the off-peak season but should not require incremental expenditure. Therefore, this recommendation can be implemented with existing resources.

FINDING

The Educator Licensure program works closely with the Committee on Professional Standards in Education (COPS) and higher education institutions to improve policies and relationships that open pathways for educators to teach in Nevada. However, gaps in communication about regulatory changes and policy updates sometimes hinder effective implementation across the team.

Feedback indicates that while the Director engages effectively with COPS and other stakeholders to approve and guide new regulations, communication within the program often lags, leading to challenges in implementation. Quotes from interviews highlight the need for improved internal communication:

- *"New regs took effect this week—barely had any insight on them until the last few weeks... could have gotten ahead of that with comms."*

- *"Sometimes we are informed of regs by applicants."*
- *"The Director wears too many hats, leaving a gap in communication re updates needed to do the job effectively."*

Despite these challenges, the program's leadership has successfully guided numerous regulatory changes through approval to address critical needs in educator pipelines.

COMMENDATION 4-F:

The Director, as Board Secretary, has effectively engaged with COPS to establish licensure standards and guide their approval through the state board. This work demonstrates a commitment to ensuring Nevada's educators are highly qualified and effective. This commitment is shared across the team.

Evidence of success includes regular advancement and approval of new regulatory changes in response to evolving needs:

- Regulations Approved by the Legislative Commission on July 28, 2021
- Regulations Approved by the Legislative Commission on February 28, 2022
- Regulations Approved by the Legislative Commission on June 2, 2023
- Regulations Approved by the Legislative Commission on September 16, 2024

RECOMMENDATION 4-6:

Continue pushing to innovate on educator pipelines, while complementing these efforts with a robust communication plan for effective implementation. Key actions include:

1. **Expand pathways for educators:** Continue exploring and supporting alternative licensure pathways, such as partnerships with organizations providing guidance for veterans to become educators, to address Nevada's teacher shortages.
2. **Develop a communication plan for policy implementation:** Ensure all staff are well-informed of regulatory changes through timely updates and accessible resources. Specific steps include:
 - **Pre-launch briefings:** Hold internal briefings for staff prior to the implementation of new regulations, detailing their implications and required actions.
 - **Comprehensive documentation:** Create a centralized repository of regulatory updates for reference by all staff.
 - **Stakeholder engagement:** Engage directly with higher education institutions and district representatives to ensure alignment and clarity around regulatory changes and pipeline improvements.
3. **Address staffing gaps:** Fill the vacant Educator Preparation Professional (EPP) role to ensure that regular updates and communications are effectively managed and that new pathways are supported with dedicated oversight.
4. **Leverage insights from teacher preparation redesign:** Incorporate recommendations from the Teacher Preparation Redesign section of the Nevada Commission on Innovation and Excellence in Education (CIEE) report, such as the following:
 - Establish metrics to evaluate how well programs prepare educators.

- Consider licensure implications of higher education programs advancing personalized, competency based learning that extends beyond traditional classroom paradigms.
- Revise teacher preparation accreditation regulations to align and systematize best practices across the state.

Collaboration with districts and higher education institutions should guide these efforts. Next steps to implement these recommendations should include the following:

1. **Host regular staff updates:** Schedule monthly meetings for program staff to review regulatory changes and discuss implementation progress.
2. **Centralize communication:** Develop an internal communications platform to house all regulatory updates, meeting minutes, and implementation guides.
3. **Collaborate with COPS and districts:** Continue to expand collaborative efforts with COPS as well as district representatives to ensure alignment of expectations and processes.
4. **Strengthen stakeholder relationships:** Continue to build new partnerships and strengthen existing partnerships with higher education institutions and alternative licensure organizations to innovate new pathways and address gaps in the educator pipeline.
5. **Recruit and onboard key roles:** Expedite recruitment for the EPP role and ensure comprehensive onboarding to strengthen support for new and existing educator preparation programs.

FISCAL IMPACT

Efforts to address communication and pipeline improvement will leverage existing structures and staff.

FINDING

The Director of Educator Licensure currently oversees facilities management for the South Office (Las Vegas), which detracts from his ability to focus on core responsibilities within the Educator Licensure and Family Engagement (EDLiFE) Division. This responsibility is not aligned with the purpose of the Office of EDLiFE.

Delegating this responsibility to a more appropriate role would enable the Director to dedicate full attention to program priorities.

RECOMMENDATION 4-7:

Delegate facilities oversight for the Southern Office (Las Vegas) to the newly appointed Deputy Administrator.

Note: The Deputy Administrator is a new role recommended for addition in our proposed reorganization of NDE (**Recommendation 1-6, see Exhibit 1-22**).

This delegation ensures that facilities management is aligned with a role responsible for organization-wide coordination. The Deputy Administrator will be uniquely positioned to balance competing priorities across offices and divisions, including managing limited facilities resources such as office space.

Delegating this work away from the Director of EDLiFE and to the Deputy Administrator would have a two-fold benefit:

1. Improve the efficiency of facilities management by placing it under a leadership role responsible for cross-division coordination and operational oversight.
2. Free the Director of EDLiFE to focus fully on leading the division, ensuring strategic and operational goals receive appropriate attention.

The following steps will guide effective implementation of this recommendation:

1. **Formally delegate responsibility:** The Superintendent should formally assign facilities oversight for the South Office to the Deputy Administrator upon hire or after a short transition period following hire.
2. **Adjust Classification Specifications as needed:** Coordinate with NDE Human Resources to remove Southern Office facilities management from the classification specifications of the Educator Licensure Director.
3. **Document current processes:** The Director of EDLiFE, in collaboration with the Deputy Administrator, should document existing facilities processes, key contacts, and any ongoing tasks related to the South Office.
4. **Transition responsibilities:** Facilitate a smooth transition by providing necessary background information, training, and resources to the Deputy Administrator to ensure continuity in facilities management.
5. **Monitor and assess:** Conduct a review after six months to evaluate the effectiveness of the new arrangement and identify any further adjustments needed.

FISCAL IMPACT

No significant fiscal impact is anticipated, as this recommendation reallocates existing staff resources. Minor time investments may be needed for training and transition support, which can be absorbed within current operations.

Office of Parental Involvement and Family Engagement

Parental Involvement and Family Engagement is a shared responsibility between schools, families, and communities where all receive equitable access to tools and supports needed to successfully work together toward the development of children and youth for college, career and lifelong learning. This office was created by Assembly Bill 224 of the 2011 Legislative Session with the following purposes:⁷⁶

- Assist school districts and schools with incorporating effective family engagement practices and strategies.
- Collaborate with the Advisory Council for Family Engagement to create, develop, and evaluate state and local family engagement policies.
- Collaborate with internal and external stakeholders to plan and implement a biennial statewide family engagement summit.
- Share family engagement best practices and grant information with districts and schools.

In 2007, Senate Bill 143 created the Advisory Council for Family Engagement. The Council works to facilitate parental involvement and family engagement by reviewing the policies of parental involvement

⁷⁶ NDE, 2024.

adopted by the State Board and boards of trustees and working in collaboration with the Office of Parental Involvement and Family Engagement. The Council reviews information regarding communication with and participation of families in annual accountability reports from districts and charters and identifies methods to communicate effectively and provide outreach with parents, legal guardians, and families who may have limited time for engagement or are limited English proficient. Finally, the Council works to identify ways that parental involvement and family engagement affect the performance, attendance, and discipline of students.⁷⁷

Budget and Staffing

Budget Code 2706 is the Budget Code assigned to Parental Involvement and Family Engagement. As shown in **Exhibit 4-19**, the budget for the office is limited to general office expenditures.

EXHIBIT 4-19
BUDGET FOR PARENTAL INVOLVEMENT AND FAMILY ENGAGEMENT
FY 2024 AND FY 2025

2706	Category	Tot FY 2024	Tot FY 2025
1	Personnel	\$122,237	\$123,456
2	Out-Of-State Travel	\$2,303	\$2,303
3	In-State Travel	\$2,526	\$2,526
4	Operating	\$1,824	\$1,824
10	Parental Involvement Summit	\$0	\$10,000
11	Int Comm On Educational Opp for Military Children	\$7,500	\$7,500
12	Indirect Cost	\$18,758	\$20,217
26	Information Services	\$834	\$833
32	Council On Parental Involvement	\$6,774	\$6,774
82	Department Cost Allocation	\$291	\$291
87	Purchasing Assessment	\$7	\$7
	TOTAL	\$163,054	\$175,731

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

Personnel costs within this budget include the salary and benefits for one Education Program Professional.

FINDING

The Office of Parental Involvement and Family Engagement is not staffed to provide the level of monitoring and support desired by the Advisory Council for Family Engagement.

The Advisory Council for Family Engagement submits a report regarding their work and recommendations each odd-numbered year. The most recent Annual Report from the Council contained the following Legislative recommendations:⁷⁸

1. The need to fund and require a parental involvement and family engagement coordinator in each public school district and the necessity to continue the appointment of a Statewide Parental Involvement and Family Engagement Coordinator. Funding to include the ability for parental involvement and family engagement professional development opportunities.

⁷⁷ Id.

⁷⁸ Advisory Council for Family Engagement: 2025 Legislative Report.

2. Require district accountability reports pursuant to NRS 385A.320 and similar information in the annual report of accountability prepared by the State Public Charter School Authority shall be in an understandable and uniform format and, to the extent practicable, provided in a language that parents can understand, sent to families, and posted on the Nevada Report Card website to ensure accessibility for families.
3. Require all boards, commissions, and councils that impact students to have an appointed family representative of a child currently enrolled in a public school.
4. Legislative language should use family-centered, inclusive language. The term “parent” is not inclusive of other family members who serve as the child’s guardian or caregiver.
5. The need to fund a platform to collect and analyze family engagement data to determine the extent to which the level of parental involvement and family engagement affects the performance, attendance, and discipline of pupils.

The report goes on to provide further details on their recommendations which include the appointment of a Coordinator and the creation of various surveys and other tracking tools which are clearly beyond the work currently being performed.

The Advisory Council for Family Engagement was created to engage parents and families by reviewing effective practices carried out by school districts and other states to increase parental involvement and family engagement and determine the feasibility of carrying out those practices statewide in Nevada. The Council reviews information regarding communication with and participation of families in annual accountability reports from districts and charters and identifies methods to communicate effectively and provide outreach with parents, legal guardians, and families who may have limited time for engagement or are limited English proficient. Finally, the Council works to identify ways that parental involvement and family engagement affect the performance, attendance, and discipline of students.⁷⁹

This council has 11 members. Nine are appointed by the State Superintendent and include the president of the NV PTA, one administrator, one business/industry representative, two parents, two teachers, and two members of local board of trustees.

RECOMMENDATION 4-8:

Work with the Advisory Council for Family Engagement to determine the staffing needs associated with the recommendations shown above and work with the Legislature to secure fundings for an additional position to carry out these duties.

Implementation of this recommendation will require NDE and the Council to work directly with the Legislature to secure funding. Once funding for the position is obtained, NDE and the Council should work together to draft a job description and detailed areas of responsibility that align with the desires of the Council and are workable by the agency.

⁷⁹ Advisory Council on Parental Involvement <https://doe.nv.gov/boards-commissions-councils/advisory-council-for-family-engagement/>, 2024.

FISCAL IMPACT

The cost of a Coordinator is estimated based on the average annual salary of an Education Programs Director of \$92,454 plus 50 percent benefits (\$46,227) or \$138,681.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Secure funding for an additional position to carry out Council recommendations	(\$138,681)	(\$138,681)	(\$138,681)	(\$138,681)	(\$138,681)

FINDING

Parental Involvement and Family Engagement is organized under the Office of Educator Development Support and Family Engagement and its placement in the organization does not lend itself to collaborating with others like student-centered services.

The majority of work performed by the EPP assigned to Parental Involvement and Family Engagement has no relationship to the other offices within that Division, which are focused on the licensing and preparation of educators. Educator Development Support deals primarily with educator preparation while Educator Licensure deals with the licensing of educators. Neither of the programs have direct interactions with the Office of Parental Involvement and Family Engagement or parents or families in general.

The mission statement of the Office for a Safe and Respectful School Learning Environment reads as follows: *The Office for a Safe and Respectful Learning Environment creates equitable systems that supports students, educators, and families in fostering a safe and respectful learning environment.* According to staff interviews, this Office regularly interacts with parents and families and groups that work directly with parents and families. The rationale for moving Parental Involvement and Family Engagement under Safe and Respectful Learning Environment is that families should be engaged with their children's education throughout the K-12 experience.

Aligning these offices would result in further collaboration among the groups working directly with families and could result in better alignment of the programs and eliminate some redundancies.

RECOMMENDATION 4-9:

Move Family Engagement under the umbrella of Safe and Respectful School Learning Environments.

The rationale for moving Family Engagement from Educator Engagement and Licensure to the Office for a Safe and Respectful Learning Environments in a state department of education typically reflects a shift in priorities or a rethinking of how family engagement aligns with broader educational goals. The rationale includes:

Holistic Focus on Student Well-Being

- The Office for a Safe and Respectful Learning Environments emphasizes creating conditions where students feel supported, respected, and safe. Family engagement plays a vital role in fostering environments that promote:
 - Social-emotional learning.

- Mental health and well-being.
- Positive school climates.
- By integrating family engagement into OSRLE, it reinforces the connection between family involvement and overall student safety, belonging, and respect.

Broader Scope Beyond Educators

- Placing family engagement under Educator Engagement and Licensure ties it closely to teacher professional development, recruitment, and retention. However, family engagement extends beyond just educators—it involves parents, guardians, and communities as key stakeholders in student success.
- The Office for a Safe and Respectful Learning Environments often has a broader, cross-cutting role, making it a more natural fit for managing family engagement initiatives.

Emphasis on Fairness and Inclusion

- Offices focused on safe and respectful learning often lead efforts around fairness, diversity, and inclusion. Family engagement is critical for:
 - Addressing disparities in access and outcomes.
 - Encouraging culturally responsive practices.
 - Building partnerships with families from underserved or marginalized communities.
- Relocating family engagement here signals a commitment to integrating families into fairness-focused work.

Strengthening Partnerships

- Families are instrumental in creating a safe and respectful environment both at school and at home. Moving the office highlights the importance of:
 - Collaborative problem-solving (e.g., addressing bullying, supporting trauma-informed practices).
 - Unified approaches between schools and families to improve the school climate.
 - Family input in designing policies that ensure safety and respect.

Streamlining Responsibilities

- The Educator Engagement and Licensure office may focus on technical, regulatory, and workforce issues, such as certification standards and teacher development. Moving family engagement to another office allows:
 - A sharper focus on the professional needs of educators.
 - The family engagement team to work on broader community-based initiatives, without being constrained by educator-specific priorities.

Alignment with Federal and State Policies

- Many federal and state policies emphasize family engagement as part of safe, inclusive educational settings. For example:
 - The Every Student Succeeds Act (ESSA) prioritizes family-school partnerships.
 - Family engagement aligns with school improvement plans, Title I, and social-emotional learning initiatives, which often fall under office focused on school climate and student well-being.

Enhanced Public Messaging

- Families may resonate more with the idea of "Safe and Respectful Learning Environments" than with "Educator Engagement and Licensure," making the shift helpful for:
 - Branding family engagement efforts.
 - Communicating the office's mission clearly to parents and the community.

This realignment reflects a strategic choice to prioritize family engagement as central to building safe, inclusive, and effective learning environments for all students

FISCAL IMPACT

This recommendation can be accomplished with existing resources.

OFFICE FOR A SAFE AND RESPECTFUL LEARNING ENVIRONMENT (OSRLE)

Overview

The Office for a Safe and Respectful Learning Environment was established in 2015 by the Governor's order. The office is responsible for monitoring compliance and supporting school districts with applicable school and student safety laws including behavior and physical health. This office establishes training programs to improve school climate and prevent, identify, and report incidents of bullying and cyber-bullying, school safety reporting, suicide prevention, Multi-Tiered System of Support (MTSS), and restorative/discipline practices. In addition, this office implements and monitors the SafeVoice and Handle with Care programs, and supports districts in their emergency management planning, as well as bus transportation.

In July 2015, Senate Bill No 504, Section 4, established the Office for a Safe and Respectful Learning Environment within the Department of Education. The bill states that the Office must maintain a 24-hour, toll-free hotline and an Internet website by which a person may report an incident of bullying or cyber-bullying or receive information regarding antibullying efforts and organizations. The Office must also provide outreach and anti-bullying education and training. The Director of the Office, who is appointed by and serves at the pleasure of the Superintendent of Public Instruction, must establish procedures by which the Office may receive reports and complaints regarding bullying and cyber-bullying, and the Director or their designee must investigate any complaint that a teacher, administrator, principal, coach, or other staff member has violated applicable provisions of law regarding bullying or cyber-bullying.

The OSRLE is also charged with implementing Goal 6 in the Statewide Plan for the Improvement of Pupils (STIP). **Exhibit 4-20** shows the overall goals for the OSRLE.

EXHIBIT 4-20
GOAL 6 OF THE 2020 STATEWIDE PLAN FOR THE IMPROVEMENT OF PUPILS

- **Goal 6:** All students and adults learn and work together in safe environments where identities and relationships are valued and celebrated.
 - **Equity:** Address disproportionate discipline.
 - **Access to Quality:** Implement Multi-Tiered System of Supports
 - **Success:** Improve school safety.
 - **Inclusivity:** Improve school climate.
 - **Community:** Expand access to behavioral health professionals.
 - **Transparency:** Cultivate a public-friendly Department.

Source: Excerpt from the 2020 Statewide Plan for the Improvement of Pupils, 2024.

Exhibit 4-21 shows the Biennial Budget for FY 2023-25 for Budget Code. The narrative for Budget Code 2721 reads as follows:

The Office for a Safe and Respectful Learning Environment is responsible to monitor compliance and support school districts with applicable school and student safety laws inclusive of behavioral and physical health. This office will establish programs of training to improve school climate and prevent, identify, and report incidents of bullying and cyber-bullying, school safety reporting, suicide prevention, and restorative/discipline practices. In addition, this office will implement and monitor the SafeVoice and Handle with Care Programs, and support districts in their planning for emergency management, social emotional learning, tiered systems of support, and Discipline/Restorative Practices Plans. NRS 388.121-145 (Climate and School Safety), NRS 388.229-266 (Emergency/Crisis Management), NRS 392.420-455 (Health and Safety) and NRS 392.461-472 (Behavior and Discipline)

EXHIBIT 4-21
BUDGET FOR OSRLE
FY 2024 AND FY 2025

2721	Category	Tot FY 2024	Tot FY 2025
1	PERSONNEL	\$1,250,499	\$1,297,165
3	IN-STATE TRAVEL	\$8,027	\$8,027
4	OPERATING EXPENSES	\$9,853	\$10,078
5	EQUIPMENT	\$4,608	\$0
12	INDIRECT COST	\$118,982	\$133,210
13	HOLOCAUST EDUCATION PROGRAMS	\$188,856	\$200,875
22	SCHOOL CLIMATE SURVEYS	\$201,000	\$201,000
23	SAFEVOICE PLATFORM	\$76,146	\$193,000
26	INFORMATION SERVICES	\$11,126	\$9,130
27	COLLABORATING STATE INITIATIVE	\$498	\$498
28	SSVP STDNT THREAT 16939XXT	\$0	\$32,002
29	SSVP MNTL HLTH TRNG 16839XXM	\$0	\$0
31	NEW SC ADMIN 84.184A	\$285,615	\$320,084
32	NEW SC ATS 84.184A	\$145,963	\$0
35	PACIFIC INST RESEARCH EVAL	\$0	\$0

2721	Category	Tot FY 2024	Tot FY 2025
36	TRAINING TO PREVENT BULLYING	\$15,000	\$15,000
37	BULLYING INFORMATIONAL MATERIAL	\$5,278	\$5,278
40	EHR PROJECT	\$400,000	\$0
41	NOW IS THE TIME INITIATIVE 93.243A	\$3,187,206	\$2,889,437
42	TRAUMA RECOVERY PROGRAM	\$1,062,013	\$229,103
43	SCHOOL BASED MENTAL HEALTH SERVICES 84.184H	\$5,323,509	\$1,854,592
44	TRAUMA INFORMED SERVICES GRANT	\$1,629,460	\$1,723,567
45	SCHOOL VIOLENCE PREVENTION	\$1,985,347	\$668,235
55	INFINITE CAMPUS MODULE	\$10,000	\$10,000
56	HEALTH PARTNERSHIP	\$0	\$0
58	COMPUTER EQUIPMENT SB500	\$4,808	\$2,568
60	ARPA TRAUMA SUPPLEMENTAL	\$4,000,000	\$2,046,641
82	DEPARTMENT COST ALLOCATION	\$2,911	\$2,911
87	PURCHASING ASSESSMENT	\$1,725	\$1,725
88	STATEWIDE COST ALLOCATION PLAN	\$17,241	\$21,823
93	RESERVE FOR REVERSION TO GENERAL FUND	\$35,232	\$140,473
	TOTAL	\$19,980,903	\$12,016,422

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

FINDING

The OSRLE staff is small but mighty, and has managed provided schools and districts with services and training covering numerous initiatives to assist in keeping students and district staff safe and providing for a “respectful” learning environment. To be clear, Exhibit 4-22 shows that in the 2023-24 school year, OSRLE served 479,578 students, 781 schools, and 27,081 teachers. This count does not include the remainder of district staff served. This office oversees chronic absenteeism (rate of 25.9 %), bullying, and cyber bullying resulting in suspension (3,696 in one year). During the 2023-24 school year, 610 students were expelled for bullying and cyber bullying. This monumental charge for OSRLE is being carried out by one Director, nine FTEs, and four contractors.

EXHIBIT 4-22

EXCERPT FROM THE 2023-24 NEVADA REPORT CARD



Source: 2023-24 Nevada Report Card, NDE, 2024.

The Office for a Safe and Respectful Learning Environment (OSRLE) works to ensure that every student in Nevada feels safe and supported physically, emotionally, and socially. In addition, they partner with EDLiFE to support specialized instructional support personnel (SISP), including school psychologists,

school counselors, school social workers, school nurses, speech-language pathologists, library media specialists, and others. The following links will share additional information on each of these initiatives:

- [Bullying Prevention](#)
- [SafeVoice](#)
- [School Safety](#)
- [School Climate](#)
- [Student Discipline/Restorative Practices](#)
- [Student Health and Wellness](#)
- [Multi-Tiered System of Supports](#)
- [Chronic Absenteeism](#)

OSRLE staff also directly support **SafeVoice**, an anonymous reporting system used to report threats to the safety or well-being of students. In partnership with the Nevada Department of Public Safety, the SafeVoice program provides students and adults with a safe place to submit tips concerning their own safety or that of others. A fully trained professional team of experts responds in an appropriate manner 24/7/365.

The Public Works team interviewed each member of the OSRLE staff (with the exception of the new Director hired in late December of 2024). Despite the tremendous workload, staff members remained loyal and enthusiastic to carrying out their mission. The team exuded confidence in each other and expressed they helped each other when needed, even if it was not in their “job description.”

COMMENDATION 4-G:

The OSRLE staff is commended for its tenacity in supporting Goal 6 of the STIP, serving 781 schools and doing so with a “can do” attitude.

FINDING

The Office for a Safe and Respectful Learning Environment is woefully understaffed to fulfill all federal responsibilities and state legislative mandates. Exhibit 4-23 shows the current organization of the OSRLE. As shown, the newly hired Director reports to the Deputy Superintendent of EFEE. This position was vacant from 8/23/24 through 1/7/25. A new Director was hired at the end of December 2024. The office has one Director and nine full-time staff plus two vacant positions.

The Utah Department of Education has 18 FTE's overseeing the same functions as OSRLE. Below shows the various functions and FTEs assigned to each.

- Bullying Prevention = 0.5 FTE (1 staff)
- School Safety / Safety Plans = 5.5 FTE (7 staff), plus
 - FTE (5 staff) = Utah State Board of Education
 - FTE (1 staff) = Liaison from Utah Dept. of Public Safety, Division of State Security
 - 0.5 FTE (1 staff) = Liaison from Utah Dept. of Health and Human Services, Office of Substance Use and Mental Health
- Suicide Prevention = 1.5 FTE (3 staff)
- Student Health and Wellness = 1 FTE
- Social Emotional Learning (SEL) = 0.10 FTE (1 staff)
- Chronic Absenteeism (and Dropout Prevention) = 1.5 FTE (2 staff)
- School Climate = 1 FTE (2 staff at 0.5 FTE)
- Restorative Practices = 0.5 FTE (1 staff)
- Multi-Tiered System of Support (MTSS) = 0.125 FTE

Exhibit 4-24 shows all state and federal mandates that the OSRLE with a staff of 10 is responsible for providing services.

EXHIBIT 4-24

STATE AND FEDERAL MANDATES UNDER THE RESPONSIBILITY OF OSRLE

Task Name	NRS/NAC	Enabling Legislation
School Safety Team	NRS 388.1323	
Maintain 24-hr reporting and information hotline and website.	NRS 388.1323(3)(b)	N/A
Outreach and anti-bullying education and training for pupils, parents and guardians, teachers, administrators, coaches and other staff members and the members of a governing body.	NRS 388.1323(3)(b)	N/A
Training regarding: (1) recognizing discrimination & bullying, (2) intervention and remediation strategies, and (3) reporting incidents/violations of bullying. (4) suicide prevention & relationship with bullying including resources for pupils who are members of groups at a high risk of suicide. Such groups include, without limitation, the groups described in subsection 3 of NRS 388.256.	NRS 388.1323(3)(b)(1-4)	N/A
Per AB65, SafeVoice reports of adult-to-child bullying are conducted at the appeal level. Tracking of all other reports of adult-to-child bullying.	NRS 388.1323(5)	AB 65 (2023)
Process appeals after school & LEA findings if requested by parents	NAC 388.915	N/A

Task Name	NRS/NAC	Enabling Legislation
Ensure outreach & training information on and referral to suicide prevention resources and the relationship between bullying/cyberbullying and suicide.	NRS 388.1323(3)(b)(4)	SB 239 (2019)
Pupil Transportation Safety	NRS 386 & NRS 484A	N/A
Update Resources on Website (annual review)		
Sex/gender diverse	NAC 388.880	N/A
SafeVoice/Handle with Care	NRS 388.1455(5)(a)	SB 80 (2019)
School Climate	NRS 385A.650	SB 80 (2019)
School Safety	NRS 388.1324	SB 80 (2019)
Restorative Disciplinary Practices	NRS 392.472 & NRS 388.133(2)(c)	SB 89 (2019), AB 168 (2019), AB330 (2023), AB285 (2023)
Concussion Protocol	NRS 385 (upon codification)	SB 80 (2023) Sec. 6.5(3)
Chronic Absenteeism	SB 210?	SB 89 (2019)
Informational Pamphlet	NRS 388.1341	
Bullying Prevention Account grants	NRS 388.1325-1327	
Program of Training	NRS 388.1342	
Appropriate mental health services at the school and in the community in which the school is located and how and when to refer pupils and their families for such services	NRS 388.1342(1)(d)(1)	SB 204 (2019)
Other persons and organizations in the community in which the school is located, including, without limitation, religious and other nonprofit organizations, that may be able to assist with the response to a suicide	NRS 388.1342(1)(d)(2)	SB 204 (2019)
Model Policy for OSRLE	NAC 388.875-925	
Methods to support schools' requirements to prevent bullying, improve school environment, and facilitate positive human relations by eliminating bullying and cyber-bullying.	NRS 236.073 & NRS 388.1395	
Emergency Operations Plan (EOP)	NRS 388.253 (see also NRS 388.243)	
Annual review of Model EOP	NRS 388.253	
Annual school safety conference	NRS 388.265 (all-inclusive)	
Ensure that School Safety Specialists complete training provided by OSRLE pursuant to NRS 388.1323	NRS 388.910	SB 89 (2019)
Model Policy for the Prevention of Suicide	NRS 388.256	
Post model policies on NDE website.	NRS 388.256(5)	SB 204 (2019)
NDE shall adopt regulations relating to the transition from a residential treatment facility for mental illness to an educational setting after discharge.	NRS 388.885	SB 210(3)(d) (2021)
Help governing body with training for SROs in suicide prevention	NRS 388.2565	SB 204 (2019)
Support Committees	NRS 388.1324	

Task Name	NRS/NAC	Enabling Legislation
Committee on Safety and Well-being of public school staff: OSRLE director must serve on committee. OSRLE staff will support meeting goals	NRS 391	AB72
Restorative Justice Practices	TBD	AB330 & AB 285
Statewide Framework, Establish standards for a plan based on restorative justice to enable a public school to address the unique needs of pupils.	NRS 388.1333(1)(a)	SB 354 (2021)
Revises progressive discipline and restorative justice plans as relevant to school and student discipline.	NRS 385A.250	AB 285 (2023)
Data Collection	TBD	AB 285 (2023)
Restorative Justice Practices	NRS 392	AB330
NDE shall post on website a guidance document that includes a) description of the requirements of NRS 392.462, b) a timeline for implementation of NRS 392.472 and 392.462, c) one or more models of restorative justice and best practices, d) a curriculum for progressive discipline relating to restorative justice including references for consultants/presenters, and e) one or more examples (see above)	NRS 392.472	AB 168 (2019)
Add RP to Model Policy on SRLE & regs for NRS 392.472 (see Model Policy section above).	NRS 392.472	SB 89 (2019)
Restorative Discipline Plans (district level plan)	NRS 392.4644	
Plans are due to NDE on November 15th each year	NRS 392.4644(3)	AB 168 (2019)
Discipline Data		
5-Year plan contents: (d) Increase the rate of attendance of pupils and reduce the number of pupils who drop out of school;	NRS 385.112(4)(d)	
(f) Manage effectively the discipline of pupils; and	NRS 385.112(4)(f)	
6. An identification, by category, of the employees of the Department who are responsible for ensuring that each provision of the plan is carried out effectively.	NRS 385.112(6)	
7. A timeline for carrying out the plan, including, without limitation:	NRS 385.112(7)	
(a) The rate of improvement and progress which must be attained annually in meeting the goals and benchmarks established by the State Board pursuant to NRS 385.113; and	NRS 385.112(7)(a)	
(b) For each provision of the plan, a timeline for carrying out that provision, including, without limitation, a timeline for monitoring whether the provision is carried out effectively.	NRS 385.112(7)(b)	
NDE shall develop and provide guidance on collection of discipline data, including:	NRS 385A.840(2)(a)	AB 490 (2019)
Standard definitions for offenses and related sanctions	NRS 385A.840(2)(b)	AB 490 (2019)
Provide training and progressive discipline on reporting and analyzing of discipline data (such that	NRS 385A.840(2)(c)	AB 490 (2019)

Task Name	NRS/NAC	Enabling Legislation
educational personnel can create a report, interpret the report, and develop a responsive plan of action		
SafeVoice/Handle with Care	NRS 388.1451-1459	
Collect Quarterly Report from Department of Public Safety	NRS 388.14557	
School Bus Safety (Transportation)	NRS 386.790 - 386.845	
Prohibited substances for commercial drivers	NRS 483 & 49 C.F.R. § 383.37	AB 400 (2023)
Authorization for SPCSA to award funds for transpiration of pupils, follow up with those awarded to ensure Safety and compliance of NV laws	NRS 483	AB 400 (2023), Sec. 28.5
Update the manuals for School Bus Standards, School Bus Out of Service, and School Bus Trainers manuals.	NRS 386.830	AB 417 (2021)
Training Compliance	NRS 386.825	
Support Department of Public Safety in annual reporting.	NRS 386.830	AB 417 (2021)
Ratios for Specialized Instructional Support Personnel (SISP)	NRS 388.890	
State Board of Education to adopt non-binding recommended ratios that prescribe a suggested ratio of pupils per each type of SISP, including evidence-based national standards and unique needs of certain pupils including English Learners.	NRS 388.890(7)(b)	SB 89 (2019), AB 304 (2019)
Board of Trustees of each district shall develop a 15 yr strategic plan to achieve the ratios	NRS 388.890(5)	SB 89 (2019)
Framework for Integrated Student Supports	NRS 388.885	
Create framework for integrated student supports to the extent money is available.	NRS 388.885	AB 275 (2017)
Add to Nevada Integrated Student Supports (NISS) methods for 1) engaging parents/guardians, 2) assessing SEAD, 3) attaining appropriate behavior from pupils, 4) screening, intervening, and monitoring the SEAD progress of pupils	NRS 388.885	SB 89 (2019)
NISS must include accountability standards for school administrators to ensure the provision/coordination of integrated student supports	NRS 388.885	SB 89 (2019)
School Climate		
Annual school improvement plan must include measures of school climate	NRS 385A.650(2)(c)	SB 89 (2019)
Social & Environmental Factors		
SBE to adopt regulations that require:	NRS 388.900	SB 267 (2019)
Governing bodies to identify the social and environmental factors that affected experiences of pupils at each school	NRS 388.900(1)	SB 267 (2019)
Governing bodies to provide a description of those factors	NRS 388.900(1)	SB 267 (2019)
NDE, governing bodies, and school staff must consider those factors when a) making decisions concerning the school, and b) interacting with or making decisions concerning the staff or pupils	NRS 388.900(2)	SB 267 (2019)

Task Name	NRS/NAC	Enabling Legislation
Decisions include: allocation of money, provision of integrated supports, staff evaluations, staff salaries, discipline of pupils	NRS 388.900(2)	SB 267 (2019)
Title IX		Title IX
FERPA -Confidentiality		20 U.S.C./1232g; 34 CFR Part 99
Homeless Youth		AB 285 & 330
Definitions of Restorative Justice vs. Restorative Discipline	NRS 392.472 upon codification	AB 330, Sec. 1(3)
Revising the contents required in certain annual reports of accountability of schools and districts; revising provisions governing the reimbursement of certain hospitals... for providing educational services to children in their care... see statute	NRS 387.1225(1) upon codification	AB 54, Sec. 4
Amendment of educational records: challenge of information believed inaccurate, misleading	NAC 388.288 (2019)	
School nurses	NRS 391.291	
Yearly SB151 Report on improving SISP ratios.	NRS 388.892	SB 151(2) (2021)
Quarterly RJ report and current ratios.	NRS 392.462 when codified	AB 285, Sec. 4.5(2)(d)
Annual RJ Report	NRS 392.4645 (upon codification)	AB 285, Sec. 5.5(4)
Additional discipline metrics in statewide system of accountability		AB 285
Standards and recommendations for progressive discipline and RJ to statewide network.		AB 285
Provide training and professional development for teachers, administrators, and other school staff on the statewide RJ framework.		AB 285
Discipline data submitted by LEAs - see Line 202		AB 285
Review discipline data submitted by LEAs		AB 330

Source: OSRLE, 2024.

The Public Works LEA survey shows that 31 percent of staff that responded to the survey gave OSRLE a fair or poor rating. **Exhibit 4-25** shows the LEA staff responses.

EXHIBIT 4-25
EXCERPT FROM PUBLIC WORKS SURVEY RELATED TO OSRLE SERVICES

How would you rate the level of support and services provided by the Educator Effectiveness & Family Engagement Division and its Offices of NDE to districts and charter schools?

Answered: 132 Skipped: 0

	EXCELLENT	GOOD	NO OPINION/ DON'T KNOW	FAIR	POOR	TOTAL
▼ Educator Effectiveness & Family Engagement Division as a whole.	0.76% 1	18.18% 24	56.06% 74	20.45% 27	4.55% 6	132
▼ Services provided by the Educator Licensure Office.	6.06% 8	16.67% 22	40.91% 54	25.00% 33	11.36% 15	132
▼ Services provided by the Family Engagement Office.	1.52% 2	15.15% 20	65.91% 87	12.88% 17	4.55% 6	132
▼ Services provided by the Safe & Respectful Learning Environment Office.	3.79% 5	19.70% 26	46.21% 61	22.73% 30	7.58% 10	132

Source: Public Works LLC Survey, 2024.

Interviews with LEA staff indicate that while the services from OSRLE are helpful, they are sparse and often delayed. Interviews also indicated that when an LEA staff member tried to call OSRLE, there was often a long delay in receiving a response or the staff member they were trying to reach was no longer employed. Being understaffed has caused some fragmented and delayed services to schools.

The responsibilities of this office are tremendous and critical to students and staff in the LEAs. The critical positions they need to adequately fulfill their responsibilities and legislative mandates include the following:

- **Assistant Director:** Given the magnitude of responsibility of OSRLE, this office requires an Assistant Director to help divide the workload of the current Director. (See proposed organizational functions chart for the proposed division of responsibilities.)
- **Education Programs Supervisor (EPS):** Given the increasing regulatory responsibilities, it is crucial to add a supervisory position to assist in overseeing compliance. Additionally, this role would be responsible for managing Adult-to-Child Bullying Appeals decisions and supervising the district's expansion of Multi-Tiered Systems of Support (MTSS).
- **Education Programs Professional (EPP):** This position is needed to provide dedicated support for suicide prevention in schools. The EPP would work closely with the Office for Suicide Prevention to implement relevant NRS and NDE policies, addressing the urgent need for youth protection. A full-time position is crucial to respond to this escalating issue, ensuring a more focused approach than the current part-time contractor can offer.
- **Educational Program Professional (EPP):** This position is needed to support districts in implementing Progressive Discipline based on Restorative Practices. Currently, OSRLE relies on a single staff member to oversee 17 districts' compliance, provide technical support, and manage training requests. Given the complexity and scale of these responsibilities, it is simply not feasible for one person to handle all aspects effectively. By adding a dedicated EPP, OSRLE can

ensure stronger compliance with NRS 392.462, 392.4644, and 392.4645, as well as alignment with NDE policies. This position will provide the focused oversight needed to foster a statewide culture of trust, inclusion, accountability, collaboration, and safety, helping districts more successfully implement restorative practices and progressive discipline across the state.

- **Management Analyst II:** This position is critical to reduce the strain on program staff and maintain consistency and compliance. This position would have oversight of grant management and writing, but also support the growing scope of ongoing grant initiatives that have outpaced the capacity of individual roles. By having a dedicated analyst, program staff will benefit from enhanced efficiency and greater accuracy in managing these vital processes.
- **Administrative Assistant IV:** Currently, OSRLE relies on one AA II in Carson City to manage a growing workload; support all staff and contractors; and handle public requests, travel, reimbursements, staff searches, the Director's calendar, and a multitude of additional tasks. With five full-time staff based in Las Vegas and no AA support in that office, the current AA's workload has become unsustainable. Adding another AA will increase efficiency, improve the working environment, and ensure essential administrative tasks are managed effectively across both locations.
- **Health Program Manager II (School Nurse Position):** This position was formerly funded through COVID relief and was aimed at bringing together district chief nurses for shared professional development. This position should coordinate with Chief School Nurses focusing on policies, emergency preparedness, vaccination and mandatory screening protocols, resource sharing (e.g., vision and hearing screenings), and the creation, implementation, and updating manuals and policies related to health and wellness.

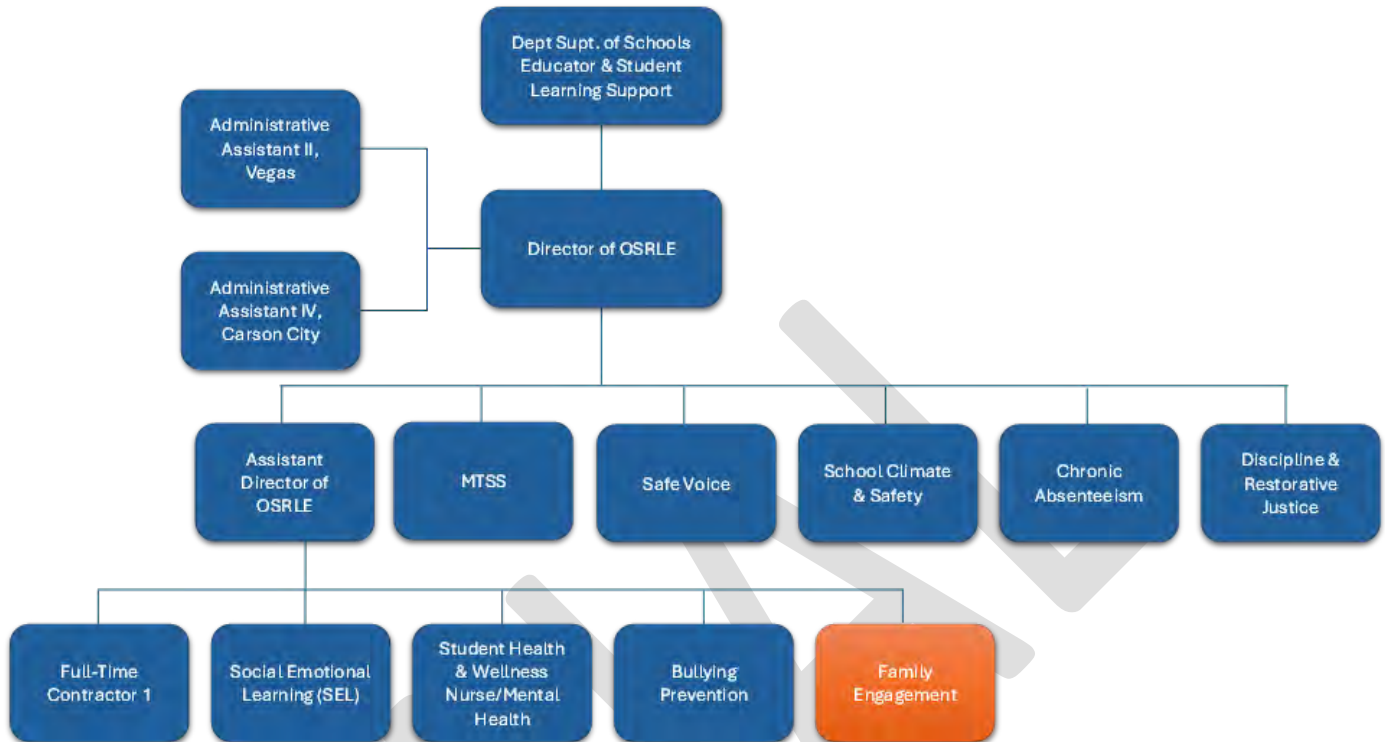
RECOMMENDATION 4-10:

Hire six new positions and fill the vacant EPP position for the OSRLE to provide adequate services to the LEAs.

The implementation of this recommendation would increase the number of staff to 18 staff members once the EPP position is filled. This number does include one staff member transferred over from the Office of Family Engagement Office.

The 18 staff would be divided into the following functional proposed organizational structure (**Exhibit 4-26**).

EXHIBIT 4-26
PROPOSED FUNCTIONAL ORGANIZATION CHART FOR OSRLE



Source: Created by Public Works LLC, 2024.

FISCAL IMPACT

To calculate the fiscal impact, the Public Works team took an approximate median salary for the position and added a 50 percent benefits rate. The total cost for one year to implement this recommendation is \$713,956. The total five-year fiscal impact to implement this recommendation is \$3,569,780.

Note: Six months after these new positions have been in place, the OSRLE Director should evaluate if the four contractor positions are still needed. If not, the elimination of the four contractor positions would help defray the cost of these positions.

Classification	Number of Positions	Salary	Benefits 50% of Salary	Total Cost
Asst Director	1	\$92,264	\$46,132	\$138,396
Education Programs Professional	2	\$80,651 x 2 = 161,302	40,325 x 2= \$80,650	\$241,952
Management Analysis II	1	\$72,023	\$36,011	\$108,034
Health Program Manager	1	\$89,651	\$44,825	\$134,476
Administrative Assistant IV	1	\$60,732	\$30,366	\$91,098
			Annual Total for All Recommended OSRLE Positions	\$713,956

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Hire six positions to support the OSRLE	(\$713,956)	(\$713,956)	(\$713,956)	(\$713,956)	(\$713,956)

FINDING

Not only is the OSRLE woefully understaffed, the work environment does not lend itself to the privacy required when dealing with topics such as suicide, bullying, cyber bullying, student mental and physical health, and other situations covered under the Health Insurance Portability and Accountability Act (HIPPA).

According to interviews, there are only two conference rooms in the Las Vegas office serving 70 staff members. Many of the staff workstations are open cubicles that do not lend themselves to private conversations. Similar complaints were expressed by the OSRLE staff housed in the Carson City office.

When staff are dealing with sensitive topics such as bullying, school safety, student discipline, suicide, and other health and wellness issues, a private room to discuss sensitive topics is essential to not violate HIPPA.

RECOMMENDATION 4-11:

Move the OSRLE staff dealing with sensitive matters to offices where they can have privacy.

Family Educational Rights and Privacy Act of 1974 (FERPA) and HIPPA compliance are becoming more complicated, and the risk of violations are more involved. FERPA (also known as the “Buckley Amendment”) ensures access by parents and students and protects against the non-approved disclosure of “personally identifiable information” about students. That information includes virtually all information staff collect and maintain on an enrolled student.

FISCAL IMPACT

This recommendation should be implemented with existing resources.

FINDING

OSRLE oversees the Multi-Tiered System of Support Initiative in collaboration with staff at the University of Nevada. This involves 202 schools and approximately 145,239 students. In 2022-23, Metis Associates conducted a study titled, “Nevada’s Schol Climate Transformation Project: Building Multi-Tiered System of Supports.” The report shows that in 2022-23, the Nevada MTSS project completed its fourth year of the five-year grant cycle and offered 49 trainings and other coaching supports to 202 schools. The evaluation findings show growth in the implementation of MTSS both at the state and district levels. Other statements in the Metis Evaluation include:

- Participating districts also continued to build their capacity to implement MTSS in their schools. Over the course of the grant, the most significant gains were observed in Training, Funding, Alignment, and Policy.

- District and school personnel participating in the MTSS trainings were very satisfied with all aspects of the PD and reported considerable gains in their content knowledge around MTSS and PBIS implementation; 96 percent of district and school personnel participating in the trainings also noted that these opportunities positively impacted their knowledge, skills, and future practices.

While it is admirable that such a small staff has been moving successfully toward the implementation of MTSS in the state, many states and best practices indicate that MTSS should not reside in one office but rather should be implemented across all NDE offices. Interviews with both LEA and NDE staff indicate that there is a lack of progress monitoring occurring.

COMMENDATION 4-H:

OSRLE is commended for its role in implementing a Multi-Tiered System of Support.

RECOMMENDATION 4-12:

Task the Deputy Superintendent of School, Educator, and Student Learning Supports with ensuring all NDE offices are playing a supportive role in the statewide MTSS.

Best practices regarding how to implement MTSS departmentwide and statewide include the following:

1. Establish a Clear Vision and Leadership Commitment

- **Define the Vision and Purpose:** Ensure that there's a clear, shared understanding of MTSS among all stakeholders. The purpose of MTSS is to provide a proactive, data-driven approach to meeting the academic, behavioral, and social-emotional needs of all students.
- **Strong Leadership Support:** Commitment from state education leaders is essential. State departments must dedicate resources and align policies to support MTSS, demonstrating its importance at every level.

2. Statewide Policy Alignment

- **Align with State Standards:** Ensure that MTSS aligns with the state's academic standards, assessment frameworks, and social-emotional learning (SEL) priorities. This alignment helps integrate MTSS with other state initiatives.
- **Legislative and Funding Support:** Secure funding and legislative support to sustain MTSS implementation over time. This could involve creating grants, allocating funding for professional development, or incorporating MTSS into broader educational reform initiatives.

3. Professional Development and Training

- **Comprehensive Training Programs:** Provide training on MTSS frameworks to teachers, administrators, and support staff across the state. This includes understanding the tiers of support, data collection methods, interventions, and monitoring progress.
- **Continuous Professional Learning:** Establish ongoing professional development opportunities so educators can refine their practices and stay updated on best practices in MTSS.

4. Data-Driven Decision Making

- **Universal Screening:** Implement universal screening tools for academics and behavior to identify students who may need additional support early on. These screenings help in determining the appropriate tier of intervention.
- **Progress Monitoring:** Set up systems for continuous progress monitoring to assess the effectiveness of interventions and make data-driven decisions. This should be done at the individual student level, but also on a broader scale to evaluate the impact of MTSS districtwide or statewide.

5. Tiered Support Framework

- **Clear Tiered Interventions:** Establish clear guidelines for the three tiers of support (Universal/Primary, Targeted/Secondary, Intensive/Third). Ensure each tier includes evidence-based interventions that increase in intensity based on student need.
- **Equitable Access:** Make sure that MTSS frameworks are equitable, providing all students, especially those from underserved groups, with the supports they need.

6. Collaboration and Stakeholder Engagement

- **Build Collaborative Teams:** Foster collaboration among educators, specialists (e.g., special education staff, counselors), and administrators to create a coordinated approach to student support. These teams should meet regularly to review student data and adjust interventions as needed.
- **Family and Community Involvement:** Engage families and communities in the process to ensure that supports extend beyond the school setting. This can include providing resources for parents or hosting workshops that explain MTSS to families.

7. Effective Communication Systems

- **Develop Communication Plans:** Establish effective communication systems within districts, schools, and across the state. This could include regular updates to schools on MTSS implementation, guidelines for using data, and sharing best practices.
- **Clarify Roles and Responsibilities:** Clearly outline the roles and responsibilities of educators, administrators, and specialists within the MTSS framework to avoid confusion and ensure a streamlined process.

8. Fidelity of Implementation

- **Monitor Fidelity:** Develop a plan for monitoring the fidelity of MTSS implementation at every level. This could include regular audits, site visits, or feedback mechanisms to assess whether the system is being implemented as intended and to provide support where needed.
- **Continuous Improvement:** Make the MTSS framework flexible enough to allow for iterative improvements based on data and feedback from schools and districts. This ensures that the system evolves to meet the changing needs of students.

9. Evaluation and Sustainability

- **Evaluate Outcomes:** Conduct regular evaluations to determine whether the MTSS framework is leading to measurable improvements in student outcomes, such as academic achievement, behavioral changes, and social-emotional well-being.

- **Ensure Long-Term Sustainability:** Plan for sustainability by securing long-term funding and continuing to build capacity within districts. This may involve ensuring that MTSS practices become embedded in the state's educational culture.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

OSRLE has produced several toolkits and documents that LEAs report as being very helpful. For example, in 2022 OSRLE staff developed a Nevada School-Based Behavioral Health Toolkit for school and district use in conjunction with the Division of Child and Family Services, the Division of Health Care Financing and Policy, and community partners.

In August of 2023, OSRLE published a toolkit for schools' use called *COLLABORATIVE Roles Identifying Roles and Supporting Specialized Instructional Support Personnel Providing School Health Services*, in conjunction with Nevada Project AWARE, school nurses, and other community partners.

Additionally, OSRLE led the initiative to write a guide and completed a shared tour with 17 districts regarding the expansion of access to school health services that are paid for through Medicaid. Topics in the guide provided to districts include:

- What is MTSS?
- Developing a Clinical Workforce for School Health Services
- Building Community Relationships
- Implementing school-based behavioral health

COMMENDATION 4-1:

OSRLE is commended for researching, gathering partners, and developing toolkits and guides for school and district use related to improving student health and educational outcomes.

FINDING

The oversight of chronic absenteeism needs to be strengthened in NDE. During the time of this study, the Interim Director of OSRLE had oversight of chronic absenteeism and only one other staff member in the Office of Educator Development, Licensure, and Family Engagement was partially assisting in the effort. According to the 2023-24 Nevada Report Card, the Chronic Absenteeism Rate is 25.9 percent. While this is lower than the 2022-23 rate of 34.9 percent, it is still considerably high and should be addressed with stronger programs and assistance from NDE.

RECOMMENDATION 4-13:

Task the new OSRLE Director with creating a task force to address the chronic absenteeism rate in Nevada schools and implementing an initiative to lower the percentage of chronically absent students.

The Oregon Department of Education has developed a tool for district and school use called *District Diagnostic Tool for Addressing the Root Causes of Chronic Absenteeism*. The tool can be found at this link: <https://www.oregon.gov/ode/students-and-family/GraduationImprovement/Documents/DiagnosticToolforAddressingChronicAbsenteeism.pdf>.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

OSRLE provided bullying prevention training to all school districts in Nevada. They conducted virtual training statewide and one in-person training for Mineral County School District. When asked in interviews what kind of feedback the OSRLE received from districts on the quality of the training, the response was, “We did not conduct any surveys after the training.”

RECOMMENDATION 4-14:

Ensure any type of OSRLE training with schools and districts is followed up with surveys in order to assess the effectiveness of the training and improve upon future trainings.

It is critical for trainers that provide technical assistance and training to district staff follow up with a survey after conducting training because it allows them to assess the effectiveness of their session. Below are key reasons that a follow-up survey must be conducted:

1. **Measuring Impact:** Surveys provide direct feedback from participants, helping trainers understand whether the training had the desired impact on knowledge, skills, and confidence.
2. **Identifying Gaps:** While a training session may initially appear successful, surveys can uncover areas where the content didn't resonate or where participants still need further clarification or practice.
3. **Improvement:** Trainer effectiveness is a continuous process of learning and improving. Surveys highlight areas of strength and point out opportunities for refinement, allowing trainers to adjust their approach for future sessions.
4. **Accountability:** In educational settings, there's often pressure to ensure that professional development is both useful and aligned with goals. Surveys help determine whether the training was a good use of time and resources.
5. **Engagement and Ownership:** By asking participants for feedback, trainers show they value their input, which can increase participant engagement. When people feel their opinions matter, they may be more likely to apply what they've learned.
6. **Data-Driven Decisions:** Survey results provide concrete data, helping trainers and districts make informed decisions about future training needs, curriculum adjustments, or even new professional development initiatives.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

OFFICE OF CAREER READINESS, ADULT LEARNING, AND EDUCATION OPTIONS

The Office of Career Readiness, Adult Learning, and Education Options (OCRALEO) consists of two units: Career and Technical Education (CTE) and Adult Learning.

Career and Technical Education

Career and Technical Education is under OCRALEO. The goal of the CTE unit is that all Nevada students are equipped and feel empowered to attain their vision of success.

Programs are organized into the following 16 nationally and federally recognized clusters:

1. Agriculture, Food, and Natural Resources
2. Architecture and Construction
3. Arts, A/V Technology, and Communication
4. Business Management and Administration
5. Education and Training
6. Finance
7. Government and Public Administration
8. Health Science
9. Hospitality and Tourism
10. Human Services
11. Information Technology
12. Law, Public Safety, Corrections, and Security
13. Manufacturing
14. Marketing
15. Science, Technology, Engineering, and Mathematics
16. Transportation, Distribution, and Logistics

The Program of Study and Complementary Course Standards have been revised to include the sequence level after each Performance Indicator in the core courses (e.g., L1/L2) and provides the Content Standards, Performance Standards, and Performance Indicators for the complementary course(s).

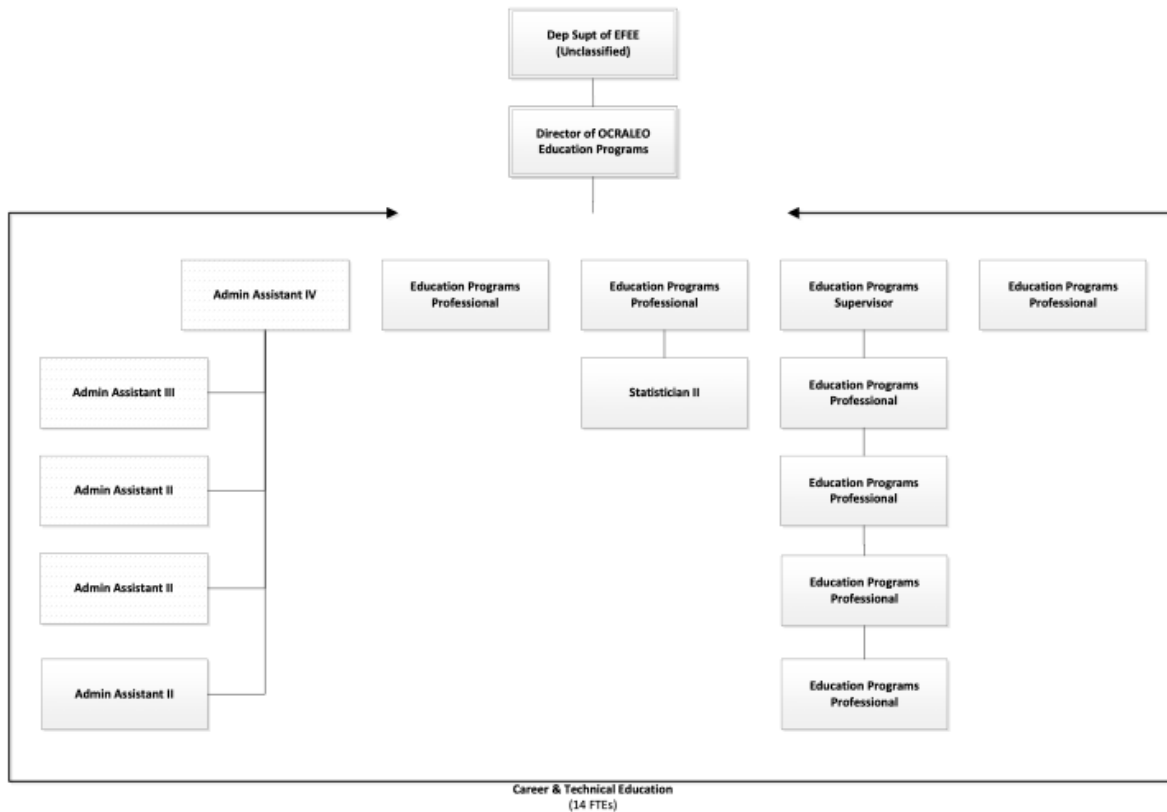
The Supplemental Program Resources Document combines information originally found in the Program of Study and Equipment List Documents as well as the Crosswalks that were previously listed at the end of each set of program standards. This area is currently under construction.⁸⁰

Organization and Staffing

Exhibit 4-27 provides the organization structure that was in place at the time of the Public Works LLC onsite review in October 2024.

⁸⁰ <https://doe.nv.gov/offices/craleo/cte/>, 2024.

EXHIBIT 4-27
CAREER AND TECHNOLOGY EDUCATION
ORGANIZATION STRUCTURE



Source: Nevada Department of Education, February 2025.

The CTE Office is led by the Director of Office of Career Readiness, Adult Learning, and Education Options who reports directly to the Deputy Superintendent of Educator Effectiveness and Family Engagement. Seven Education Program Professionals (EPP), five of whom report to one Education Program Supervisor (EPS), are responsible for the various CTE programs. The following outlines the major job responsibilities of EPPs as self-reported during interviews:

- EPS—oversees all CTE Programs; working title is assistant director
- EPP 1—oversees Agriculture Education Programs; DECA
- EPP 2—monitors programs as they relate to standards and is the Perkins Grant Administrator
- EPP 3—conducts quality program reviews and prepares annual high school reports
- EPP 4—reviews and revamps standards and works on check list for district use
- EPP 5—works with CTE district counselors, work-based learning, dual credit and CCR diploma
- EPP 6—works with teaching and learning within CTE; is contact for the Teacher Academy Pathway (with CCSD only)
- EPP 7—responsible for federal reporting and monthly reports for districts and IHE

In addition, there are five administrative assistants: one at level IV, one at level III, and three at level II. The Administrative Assistant IV supervises the work of three Administrative Assistant III and the Administrative Assistants IIs.

Budget

The Department of Education administers career and technical education programs that meet the requirements of the Nevada State Plan for Career and Technical Education. The plan is based on the needs of students within the state and serves as the application for the federal funds authorized by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V). The primary mission of the federal program is to develop and improve CTE programs, focusing on high quality programs aligned to economic and workforce development priorities of the state.

The primary funding source for the program is the Carl Perkins Vocational program funds, Budget Code 2676 NDE - CAREER AND TECHNICAL EDUCATION, as shown in **Exhibit 4-28**.

EXHIBIT 4-28 CAREER AND TECHNICAL EDUCATION BUDGET FY 2024 AND 2025

2676	Category	Tot FY 2024	Tot FY 2025
F	Personnel	\$1,426,009	\$1,502,200
2	Out-Of-State Travel	\$9,857	\$9,857
3	In-State Travel	\$20,572	\$20,572
4	Operating Expenses	\$185,840	\$196,528
11	CTE Perkins Ats 84048	\$12,715,051	\$12,541,923
12	Indirect Costs	\$175,336	\$174,278
14	Professional Development	\$32,703	\$30,000
15	Study Praxis II & Pedagogy	\$230,287	\$0
16	Perkins 84.048 Admin	\$0	\$99,612
26	Information Services	\$19,132	\$14,401
30	Training	\$6,009	\$6,009
50	Private New Skills for Youth Grant	\$271	\$0
51	Advanced DTE	\$250	\$0
70	Cost Allocation Staffing Services 84048	\$65,313	\$66,632
77	CTE Leadership Funds 84048	\$252,894	\$252,894
78	CTE Programs State	\$3,653	\$3,653
79	CTE Skills And Standards Assessment	\$167,006	\$157,576
82	Department Cost Allocation	\$3,784	\$3,784
86	Reserve	\$73,887	\$73,887
87	Purchasing Assessment	\$161	\$161
88	Statewide Cost Allocation Plan	\$19,346	\$22,787
	TOTAL	\$15,407,361	\$15,176,754

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

The Carl D. Perkins Career and Technical Education (CTE) Act of 2006 **was reauthorized** in 2018. The Strengthening Career and Technical Education in the 21st Century Act (Perkins V), aims to increase students' academic knowledge and technical and employability skills development through career-connected learning.

Perkins V requires the state, school districts, and community colleges to engage with stakeholders in their communities and create plans supporting innovation in the future of CTE. Thus, Perkins V provides opportunities to recalibrate CTE in innovative, flexible, and aligned ways. Perkins V aligns with the Workforce Innovation and Opportunity Act, the *Every Student Succeeds Act*, and the *Higher Education Act*.

The Perkins V State Plan that was approved by the U.S. Department of Education includes:

- Revisions to the state's strategic CTE goals.
- New Secondary Program Quality Indicators.
- Definitions for high-skill, high-wage, and in-demand occupations.
- Postsecondary accountability for dual credit performance indicator.
- Growth goals in CTE specific indicators.
- Provisions for future regional approaches to complete the Comprehensive Local Needs Assessment and Local Application.

The Nevada Perkins V State Plan Strategic Goals are as follows:

- **Strategic Goal 1:** Improve access to and achievement in high quality career and technical education programs of study aligned to high-skill, high-wage, and/or in-demand occupations for all student population groups as measured by State Determined Performance Levels (SDPL) targets.
- **Strategic Goal 2:** Develop a systematic approach to ensure access for all student population groups to career pathways and skill development from pre-kindergarten through postsecondary education as measured by participation and concentrator data in the State Determined Performance Levels (SDPL) targets.
- **Strategic Goal 3:** Ensure employers have a pipeline of skilled talent.

FINDING

The CTE organization has recently undergone some organizational changes to better align functions and improve services provided to the LEAs and Charter schools.

The Director of OCRALEO who oversees CTE took it upon himself to conduct an internal reorganization of CTE. Staff were interviewed regarding their qualifications and experiences. Interviews revealed that existing staff were matched with their area of expertise and individual specific duties were outlined. This action would keep districts informed of the individual staff member responsible for a career cluster and/or content area or student organizations. The internal office processes and the employees responsible for those processes were also realigned. Interviews revealed that staff are much more comfortable with their newly assigned duties and responsibilities.

During interviews, staff explained that the prior organizational structure was not aligned/matched with their area of expertise and individual duties. The new structure matched the expertise and duties so that LEAs and charters would be better informed of the individual staff responsible for career cluster and/or content area and student organizations. Three EPPs are responsible for all programs, the other EPPs have other support tasks such as work based learning, assessment, etc. Each EPP still supports program

implementation but not a specific content area. In addition, **Exhibit 4-29** shows how staff processes and procedures for LEA Support activities and internal operations will now be aligned and the individual assigned to carry out those processes. Names have been removed and replaced with their position title.

EXHIBIT 4-29
ASSIGNMENT OF INTERNAL CTE PROCESSES

LEA Support	Staff Member(s) Leading
Accountability Reporting (Perkins V, State CTE, and others required by NRS)	EPP
Assessment Tickets	Statistician
Assessments	EPP
Career advising including career exploration, counselor/administrator supports, CCR framework	EPP
CTSO Liaison – All CTSOs	EPP
CTSO Support – DECA, FBLA, FCCLA	EPP
CTSO Support – HOSA, TSA, Skills USA, FFA	EPP
Enrollment Verification	Statistician
Grants Management	EPP
Industry Recognized Credential Support	EPP
Middle school CTE Support	EPP
NACTE Liaison	EPP
New Teacher Outreach	AA
Program Content Support – Agriculture, Food, and Natural Resources; Mining; Architecture and Construction; Manufacturing; Transportation, Distribution, and Logistics; Science, Technology, Engineering, and Mathematics; Health Science; Human Services; Government and Public Administration; Law, Public Safety, Corrections, and Security.	EPP
Program Content Support – Arts, A/V Technology, and Communication; Hospitality and Tourism; Business Management and Administration; Information Technology; Marketing; Finance	EPP
Program Monitoring – Northern Region	EPP
Program Monitoring – Southern Region	EPP
Program Support – AB428, Education and Training	EPP
Public Data Visualization	EPP
Secondary to post-secondary connections including work-based learning and dual credit	EPP
Special population and non-traditional students including Methods of Administration (MOA) and identification of opportunity/achievement gaps	EPP
Verify Certificate Earners	Statistician

Source: Director of Office of Career Readiness, Adult Learning, and Education Options, March 2025.

EXHIBIT 4-30
ASSIGNMENT OF CTE OFFICE PROCESSES

Office Processes	Staff Member(s) Leading
Budgeting	Director
CTE Documentation and Protocol Maintenance	Assistant Director
Distance Education Course Approval Process	Director
Document Développment/ADA/Proof Reading	AA
Industry Recognized Credential Approval Process	Director
Instructional Materials Approval Process	Director

Office Processes	Staff Member(s) Leading
Legislation/Regulation	Director
Licensure	Director
Middle school standards development and approval process	Assistant Director
New Program Opening	Director
New program/course standards development and approval process	Assistant Director
Office Climate/Safety	AA
Travel Processing	AA
Website updates	AA

Source: Director of Office of Career Readiness, Adult Learning, and Education Options, March 2025.

The current internal restructuring has been embraced by the staff. They understand the value of restructuring and the clarification it provides for all involved. The current internal restructuring of duties and responsibilities of staff has also been very well received by district CTE directors who cite this as improved communication.

COMMENDATION 4-J:

The CTE Office is commended for its efforts to restructure and make internal assignments in an effort to improve efficiency and communication with LEAs and charter schools.

FINDING

CTE has adopted the state's mission and vision which sets the stage and guides the work of this office by providing a clear direction and foundation aimed at improving the overall system.

CTE uses the state's Vision and Mission statements as follows:

Vision Statement – State Board of Education

All Nevada students are equipped and feel empowered to attain their vision of success.

Mission Statement – Nevada Department of Education

To improve student achievement and educator effectiveness by ensuring opportunities, facilitating learning, and promoting excellence.

In feedback received from NDE, it was indicated that NDE's Mission Statement should align more accurately with current departmental priorities. We suggest that the new State Superintendent of Public Instruction review the Mission Statement and departmental priorities to revisit this concern.

CTE places a strong emphasis on incorporating student feedback to improve processes and eliminate redundancies. The United States Department of Education (USDOE) has endorsed Career and Technical Student Organizations (CTSOs) as a critical component of an effective CTE program. The term 'career and technical student organization' means an organization for students enrolled in a career and technical education program that engages in career and technical education activities as an integral part of the instructional program.

To further the development of leadership and technical skills, students have opportunities to participate in one or more of the seven CTSOs. CTSOs develop character, citizenship, and the technical, leadership and teamwork skills essential for the workforce and further education. CTSO activities are considered a

part of the instructional day when they are directly related to the competencies and objectives in the course.

To accomplish this, CTE maintains good lines of communication with established collaboratives and informed feedback loops, particularly using tools like Microsoft Teams and live chat.

CTE is noted for its effective communication, particularly in providing technical assistance and timely updates to LEAs. One example cites a superintendent saying CTE “listened to him” regarding his concern about the CTE tracks which students select. The CTE track was reduced from a mandatory three years to two, making it more appropriate for the students and providing flexibility to change tracks if necessary.

The restructuring has improved not only internal communication, but also its effective communication, particularly in providing technical assistance and timely updates to districts.

Survey comments included:

- *"There are specific people that one can highlight as effective and supportive. The CRALEO office has been great to work with."*

FINDING

Reports and recommendations relating to the improvement of Career and Technology Education in Nevada schools have been issued. It is recommended that these be reviewed for relevancy and in light of the three major strategic goals.

There have been various reports and recommendations regarding the improvement of CTE programs in Nevada schools. These reports have primarily focused on enhancing the quality, accessibility, and relevance of CTE offerings to better align with industry needs and student outcomes. Below are some key themes and recommendations to consider:

1. Industry and Workforce Alignment

- **Recommendation:** Strengthen partnerships with local businesses and industries to ensure CTE programs align with current and future workforce demands. This includes updating curricula to reflect the skills needed in rapidly evolving sectors such as technology, healthcare, and advanced manufacturing.

2. Work-Based Learning Opportunities

- **Recommendation:** Expand and enhance work-based learning experiences, such as internships, apprenticeships, and cooperative education programs, to provide students with practical, real-world experience.

3. Increased Access and Fairness

- **Recommendation:** Ensure fair access to CTE programs for all students, particularly those in underserved communities. This includes expanding opportunities for students in rural areas or those from economically disadvantaged backgrounds.

4. Curriculum and Teacher Training

- **Recommendation:** Invest in curriculum updates and professional development for CTE instructors. This includes ensuring teachers are trained in the latest technologies and pedagogical approaches, as well as providing them with industry-relevant certifications.

5. CTE Awareness and Engagement

- **Recommendation:** Increase awareness of CTE opportunities among students, parents, and communities to reduce stigma and increase enrollment. Promoting CTE as a viable and valuable career pathway alongside traditional college routes is essential.

6. Statewide Coordination and Support

- **Recommendation:** Strengthen coordination and support for CTE programs at the state level, including aligning policies, funding, and resources to maximize the impact of CTE investments.

7. Use of Technology and Innovation

- **Recommendation:** Integrate emerging technologies and digital tools into CTE curricula to better prepare students for tech-driven careers. This includes using virtual labs, simulations, and online learning platforms to supplement traditional hands-on training.

8. Data-Driven Decision Making

- **Recommendation:** Utilize data and analytics to track the outcomes of CTE programs, including graduation rates, employment rates, and wage outcomes. This data can inform continuous improvement efforts and help adjust programs to better meet the needs of students and employers.

Efforts to improve CTE programs in Nevada have involved a combination of aligning with industry needs, providing hands-on learning opportunities, expanding access to underserved populations, and investing in teacher training and curriculum updates. While much progress has been made in these areas, continuous investment in resources, partnerships, and innovation will be critical to the continued success and effectiveness of CTE programs in Nevada schools.

RECOMMENDATION 4-15:

Assess and prioritize the outstanding recommendation from these previous reports and develop, in collaboration with the LEAs, a strategic plan for the implementation of those recommendations.

This process may involve some significant program realignment and potentially some legislative action. Establishing a working group to study and address the issues would be a good first step in the process.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Career and Technical Education is in the Office of Career Readiness, Adult Learning, and Educational Options and as such aligned with Adult Education programs but is siloed from other curriculum-based courses and offerings.

Career and Technology Education is in the Office of Career Readiness, Adult Learning, and Educational Options (OCRALEO) in the Division of Educator Effectiveness and Family Engagement. OCRALEO develops and supports innovative educational opportunities for students to acquire skills for productive employment and lifelong learning.

CTE is a curriculum-based area for secondary students whose goal is that all Nevada students are equipped and feel empowered to attain their vision of success. Teaching and Learning envisions all students receiving high-quality Tier 1 instruction to maximize their future readiness. These two goals are perfectly aligned with other curriculum-based programs offered by the Office of Teaching and Learning whose Vision and Values are as follows:

Vision

Teaching and Learning envisions all students receiving high-quality Tier 1 instruction to maximize their future readiness.

Values

- Academic Knowledge: Adherence to Nevada Academic Content Standards, ensuring a strong foundation of subject matter.
- Professional Learning: A dedication to continuous improvement and the implementation of best practices for student learning.
- Access: Providing access to high-quality instructional resources to support effective teaching and learning.
- Coaching: Offering guidance and support to educators to enhance their instructional skills.
- Student Voice: Embracing a student-centric approach that values and incorporates student perspectives into the educational process.

Interviews with staff indicate that College and Career Readiness has been elevated particularly as an indicator in the Acing Accountability System. One of the essential questions in the Acing system asks, “To what degree are high school graduates prepared for success in college or a career?” It is reported that several other offices had input on this indicator without any input from CTE staff. Other decisions made were changes that CTE classes could be used as flex credits in the approval of diplomas. Furthermore, staff assert that the work lands on them without having had any input.

The lack of alignment between these groups has led to confusion stemming from inconsistent directives and duplication of effort for LEAs.

In the Public Works survey of LEAs in October 2024, one survey question asked if there were duplicative and/or inconsistent directives from Offices/Divisions of the NDE. The response indicated that different data reports ask for the same data by name, but different rules make it difficult to ensure accurate reporting. In the follow-up open-ended questions, survey respondents say that it is easy to confuse directions and cited CTE is a prime example of conflicting directives.

The Oregon Department of Education aligns Career and Technical Education under its Office of Teaching, Learning, and Assessment which is charged with ensuring that all components of Oregon’s public and private educational enterprise, pre-kindergarten through postsecondary (PK-20), are effectively interconnected to provide data and reporting that supports appropriate and personalized instruction for each student.

Within the Utah Department of Education, the Director of Career and Technical Education reports to the Superintendent of Student Learning along with the Director of Teaching and Learning and the Director of Assessment and Accountability.

The increasing popularity of Career and Technical programs appears to be based on both workforce needs and the shortage of skilled workers to fill the vacant positions and opportunities for students from all socioeconomic groups to train for higher paying jobs. Education Week published “The State of Career and Technical Education?” article in June 2025 that included the following:

In 2023, every state except Massachusetts, Minnesota, and New York passed career-education laws, with a majority of the new laws adding accountability measures for the programs and supporting more industry partnerships and work-based learning for schools. The legislative push was part of a more than decade-long state effort to make career-focused coursework more challenging and build pathways from school to work, regardless of whether students go to college after high school.

CTE is now an integral part of the secondary school’s curriculum, and as such should be more closely aligned to the core curriculum offerings to ensure the integrity of the program offerings and reduce redundancies and miscommunications when the groups are not more closely aligned.

RECOMMENDATION 4-16:

Move CTE to the proposed Division of Future Ready Students (formerly called the Division of Division of Educator Effectiveness & Family Engagement) in the Office of College and Career Readiness.

This organizational structure reflects the idea that CTE programs are integral to the overall educational experience and should be closely aligned with the general curriculum, academic standards, and pedagogical approaches.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

Adult Education

The Adult Education Unit resides in the OCRALEO. The director of these educational programs reports directly to the Deputy Superintendent of Education Effectiveness and Family Engagement. Adult Education “provides services to assist adults obtain the skills necessary for employment and economic self-sufficiency.” The Adult Education Programs include:

- Adult Basic Education (ABE) is provided through local programs funded by the Nevada Department of Education. Students are eligible to participate in adult education if 18 years old or over or at least 16 years old and not subject to compulsory attendance, who need basic math, reading, or language skills, a high school diploma or equivalency, and/or English literacy skills. ABE programs are located throughout the state and provide such services as literacy and basic skills instruction, English as a Second Language classes, programs to prepare learners to enter the workforce, preparation to successfully pass the high school equivalency (HSE) Test, and advancement to higher education.
- Adult High School Diploma Program provides lifelong educational opportunities that assist adult learners in the development of meaningful, productive lives. The administration of an Adult High

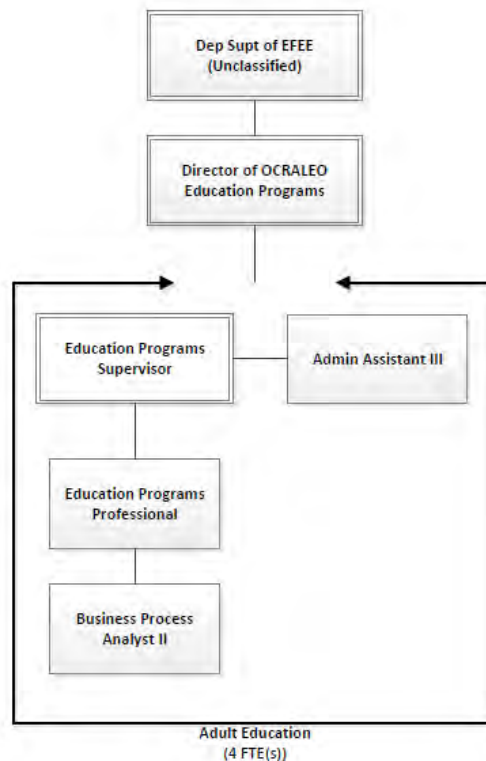
School Diploma program is the responsibility of each school district that chooses to operate a program. The goals include:

- Provide free academic counseling and instruction to eligible students who lack a high school diploma.
- Encourage students with HSE certificates to pursue an Adult High School Diploma.
- Provide courses that prepare adults for the job market or further educational endeavors.
- Coordinate with community-based organizations for support services to facilitate a student's completion of an Adult High School Diploma program.
- High School Equivalency (HSE) provides adults with the opportunity to earn the Nevada Certificate of High School Equivalency. The certificate is widely recognized as the equivalent of a high school diploma. Nevada test-takers may choose from two approved HSE exams, the GED® or the HiSET®, to validate their academic skills and knowledge. The HSE exams are administered at test sites located throughout the state.

Organization and Staffing

Exhibit 4-31 provides the organization structure of the Adult Education Office.

EXHIBIT 4-31
ADULT EDUCATION ORGANIZATION CHART



Source: Nevada Department of Education, February 2025.

In addition to the Director, Adult Education has four employees: one Education Program Supervisor, two Education Program Professionals, and one Administrative Assistant III. The major responsibilities of each position are summarized below to provide an understanding of their duties:

- EPS—Oversees federal funds and locally funded providers; writes competitive grants as needed
- EPP 1—oversees High School Equivalency and Adult Basic Education
- EPP 2—serves unofficial as Assistant Director of Adult Learning; oversees data and accountability program evaluation
- AA III—supports the four people in this office

Budget

Adult Education is primarily funded through budget code 2680 – Continuing Education. The Deputy for the Division is funded through budget code 2673, Office of the Superintendent; the director is funded through budget code 2676, Career and Technology Education; and all other positions are funded through budget code 2680, Continuing Education.

The Continuing Education account is funded through the federal Adult Education and Family Literacy Act. The purpose of the act is to provide adult basic education (ABE) and English as a Second Language (ESL) services in order to assist adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency, to assist adults in the completion of secondary school education, and to assist adults who are parents to obtain the educational skills necessary to become full partners in the education of their children. Funds are granted to eligible educational and community-based organizations on a competitive basis to carry out the purpose of the act.

Students enrolled in the programs must be over 16 years of age, must not have a high school diploma or its equivalent, and must be withdrawn from high school and not required to be in a school. A federally required 25 percent match is partially met by state funding for instruction; the local instructional programs contribute the balance of the match. **Exhibit 4-32** provides a look at the FY 2024 and FY2025 budgets for Continuing Education.

EXHIBIT 4-32
BUDGET FOR CONTINUING EDUCATION

2680	Category	Tot FY 2024	Tot FY 2025
1	Personnel	\$471,663	\$423,929
2	Out-Of-State Travel	\$3,876	\$3,876
3	In-State Travel	\$8,002	\$8,002
4	Operating Expenses	\$24,404	\$24,799
12	Indirect Costs	\$57,536	\$57,922
13	Adult Basic Ed Ats	\$10,485,112	\$7,149,454
14	Adult Literacy State	\$402,018	\$402,018
15	Adult Basic Ed Admin 84.002	\$172,786	\$63,078
16	Sandi Project Admin	\$59,069	\$0
17	Sandi Project Ats	\$635,646	\$0
26	Information Services	\$2,460	\$2,457
30	Training	\$4,063	\$4,063
50	St Adult Hs Diploma Admin	\$5,847	\$8,650
70	Salary Transfers	\$27,991	\$28,556

2680	Category	Tot FY 2024	Tot FY 2025
82	Department Cost Allocation	\$582	\$582
87	Purchasing Assessment	\$481	\$481
88	Statewide Cost Allocation Plan	\$11,861	\$14,635
	TOTAL	\$12,373,397	\$8,192,502

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

FINDING

The limited Adult Education staff have significant responsibilities but have maintained a positive working environment based on mutual respect and open communication.

During onsite interviews, staff in this office reported on their overall responsibilities which include considerable interactions with external customers and stakeholders, including:

- Overseeing federal funds for adult education and family literacy programs.
- Writing competitive grants every three to four years.
- Managing seven locally funded providers.
- Overseeing GED assessments via testing centers and state funded adult diploma. 14 of the 17 LEAs have this program.
- Serving as the main liaison for districts and providers and providing technical assistance.

When one of the four individuals are out, the work continues. Staff said they all pitch in to provide customer service to the external entities and maintain the workflow in the unit. Communication is good and they are willing and able to get work done.

COMMENDATION 4-K:

The Adult Education Unit is commended for their team spirit and willingness to pitch in to ensure that customers and external entities receive the services they need.

FINDING

Bottlenecks are created within Adult Education by the multiple levels of approval required for fiscal activities such as the administration and claiming of grants; the problem is exacerbated by a lack of current documented program-level procedures that are aligned to the grants and fiscal procedures.

Adult Education, like many other offices within NDE, depends on grants, federal and local funding. Staff report that the fiscal processes and the levels of approval required are onerous and can ultimately cause bottlenecks, which can impact program implementation. One staff member indicated that as many as 17 different approvals were required for a single transaction. In addition, Adult Education is dependent on grants, yet staff said they are reluctant to apply for new grants because of the onerous internal process required when applying for a grant.

According to staff, some of the operations in the Grants Management Unit and Fiscal Operations have recently improved. Since COVID, however, the Adult Education manuals and procedures that are in place for use by local programs have become outdated. Consequently, the program area requirements and processes are not aligned to GMU requirements, which contributes to bottlenecks and frustration when documents are returned unapproved.

Simply rewriting the Adult Education-related procedures will not solve the problem if the unit does not have a clearer understanding of the requirements and processes within other divisions. For there to be meaningful improvements, Adult Education, in collaboration with stakeholders and the fiscal units with whom they are having problems, needs to establish a working group to determine the key processes where bottlenecks occur, including the multiple approval requirements, and then determine a reasonable and effective way to remove the roadblocks.

RECOMMENDATION 4-17:

Leadership in GMU, Fiscal Operations and Adult Education should meet to outline the current process, identify bottlenecks, and work collaboratively to overcome those bottlenecks; once solutions are found, the current manuals and guidelines should be updated.

The Adult Education Director should reach out to the directors of the finance and grants offices to discuss the issues. Communication of the issues must be open and honest, providing concrete examples of the issues. Once solutions are found, Adult Education manuals should be updated and then reviewed by the fiscal representatives to ensure that the guidelines are aligned.

RECOMMENDATION 4-18:

Consider moving Adult Education under College & Career Readiness which reports to Future Ready Students as proposed in the NDE reorganization.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

SECTION 5.0: STUDENT INVESTMENT DIVISION

The Student Investment Division (SID) within the Nevada Department of Education (NDE) plays a crucial role in managing agency financial resources as well as state and federal financial resources allocated for education in Nevada. This chapter of the report examines the SID functions in the following areas:

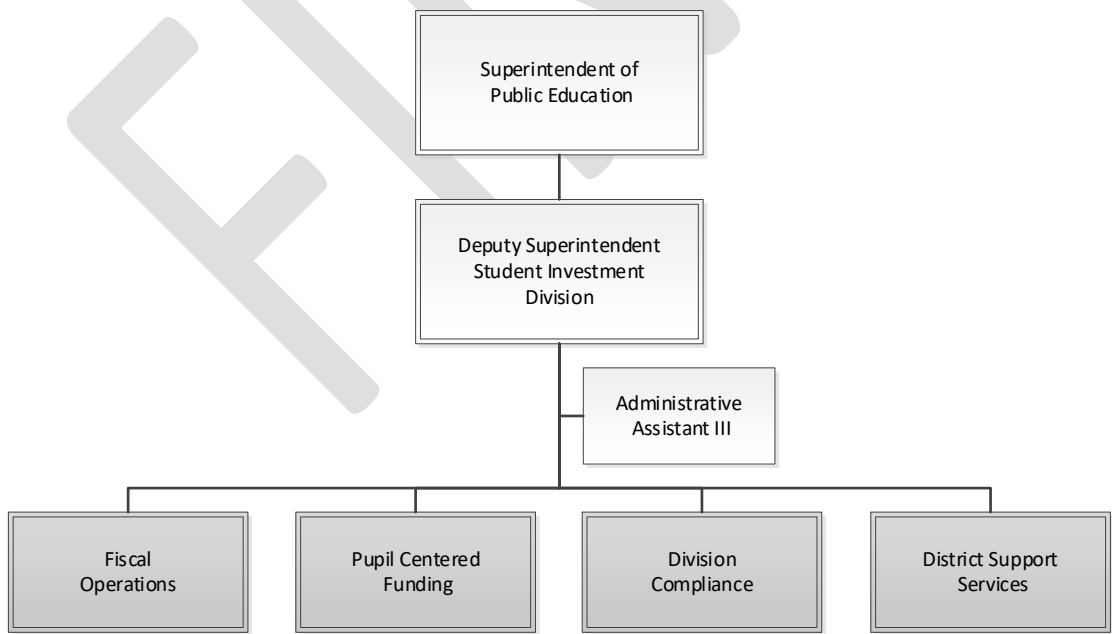
- Division Organization and Management
- Office of Fiscal Operations
- Office of District Support Services
- Office of Division Compliance

DIVISION ORGANIZATION AND MANAGEMENT

The Student Investment Division is one of three major divisions reporting directly to the Superintendent of Public Instruction. As shown in **Exhibit 5-1**, within the Division, there are four offices that carry out the functions of the Division including the Office of Fiscal Operations, the Office of Division Compliance, the Office of District Support Services, and the Office of Pupil Centered Funding (PCF). The SID is led by a Deputy Superintendent for Student Investment who has five direct reports.

PCF is outside of the scope of this review; however, the report will discuss those instances where the other SID Offices have interactions with PCF.

EXHIBIT 5-1
STUDENT INVESTMENT DIVISION ORGANIZATION



Source: Compiled by Public Works LLC, February 2025.

Roles and Responsibilities of SID Offices

The roles and responsibilities of each office are discussed in greater detail in the subsections of this chapter. The three offices included within the scope of this review include:

- Fiscal Operations – responsible for processing all transactions and managing various financial processes to include accounting, purchasing, payroll, and budget management.
- Division Compliance – responsible for performance audits, audit management, internal audit, subrecipient/grant financial monitoring, monitoring state and federal compliance to include select reporting, and organizational change management, to include policies and procedures, internal controls, and operational efficiencies.
- District Support Services – responsible for financial grants management, pupil enrollment and attendance audits, and state/federal financial reporting.

In addition to the three offices above is the Office of Pupil Centered Funding. With the passage of Senate Bill (SB) 543 during the 2019 Legislative session, the legislation authorized the Nevada Department of Education, in partnership with the Commission on School Funding, to replace the 50-year-old Nevada Plan funding formula for K-12 education in the state with a new funding formula designated as the Pupil-Centered Funding Plan (PCFP) beginning in the 2021-23 biennium. SB543 also authorized the creation of the Education Stabilization Account. The Office of Pupil Centered Funding within SID is responsible for preparing the allocations for each school district and charter school in the state and preparing the distribution schedule for funds to the schools.

FINDING

The NDE renamed the Business and Support Service Division to the Student Investment Division to keep the focus on students.

While the roles and responsibilities of the Student Investment Division include the business and finance functions of the agency, much of the work within SID is focused on distributing and monitoring the use of funds sent to LEAs, charter schools, and other grant subrecipients. These funds have been allocated to support students and enhance the instructional programs for students.

COMMENDATION 5-A:

NDE is commended for renaming the Division to the Student Investment Division to keep the focus on students.

FINDING

The Student Investment Division is organized effectively with the individual offices having clearly defined roles and responsibilities.

While there are considerable interdependencies within the division, each of the offices within SID have clearly defined roles and responsibilities.

As discussed, each office has one or more clearly defined roles. In many cases, the flow of data and information between and among the offices is also clearly defined. For example, the Office of Division Compliance is responsible for conducting the Pre-Award Assessment of grant recipients to determine their eligibility for the grants. This information is passed to the Grants Management Unit (GMU) which

then administers the distribution of grant funds. Monitoring the use of the grant funds after the award is once again a function of the Office of Division Compliance.

COMMENDATION 5-B:

SID is commended for maintaining clearly defined roles and responsibilities, while emphasizing and documenting the interdependencies between and among the offices.

Student Investment Division Staffing

According to organization charts provided by the division, **Exhibit 5-2** shows SID has a total of 44 budgeted positions. In addition, the division has a total of five contract positions, which are paid with Elementary and Secondary School Emergency Relief (ESSER) funds and supplement regular staffing to facilitate the activities associated with the management and distribution of ESSER and associated COVID-19 funds. Once these funds expire, the positions will go away.

EXHIBIT 5-2
STAFFING BY STUDENT INVESTMENT DIVISION OFFICES
FEBRUARY 2025

Offices	Positions Filled	Contractors	Total Positions
Deputy's Office	2	0	2
Deputy Superintendent	1	0	1
Administrative Assistant III	1	0	1
District Support Services	22	0	22
Administrative Services Officer III	1	0	1
School Finance Reporting Specialist/ Accountant	1	0	1
Management Analyst III	2	0	2
Grants & Projects Analyst II	1	0	1
Management Analyst II	7	0	6
Management Analyst I	2	0	2
Audit Manager	1	0	1
Administrative Assistant !!	1	0	1
Auditor III	2	0	2
Auditor II	4	0	4
Division Compliance	5	2	7
Management Analyst III	1	0	1
Program Officer I	1	0	1
Auditor II	1	0	1
Administrative Assistant III	1	0	1
Management Analyst I	1	0	1
Contractor	0	2	2
Fiscal Operations	13	3	16
Administrative Services Officer III	1	0	1
Program Officer I	1	0	1
Accounting Assistant III	1	0	1
Accounting Assistant II	3	0	3
Administrative Services Office II	1	0	1
Budget Analyst III	1	0	1

Offices	Positions Filled	Contractors	Total Positions
Budget Analyst II	3	0	3
Management Analyst II	1	0	1
Management Analyst I	1	0	1
Contractors	0	3	3
Pupil-Centered Funding	2	0	2
State Education Fund Manager	1	0	1
State Education Fund Specialist	1	0	1
Total	44	5	49

Source: Compiled by Public Works LLC from Office Level Organization Charts, October 2024.

Division Budget

The Student Investment Division's budget is incorporated into the agencywide budget, which includes the PCF accounts (2608 - NDE - Education Stabilization Account and 2609- NDE - Pupil-Centered Funding Plan Account) which flows through SID to the schools based on the state's funding formulas. Funding for the division's operations is found in two primary categories within the agency budget: 2719 – NDE District Support Services and 2720 – NDE Department Support Services. The Office of Fiscal Operations is funded solely through budget code 2720; the Office of Division Compliance is funded solely through budget code 2719; and the Office of District Support Services is funded primarily through budget code 2719, however there are two Management Analyst positions in GMU that are paid through 2709- NDE - Office of Early Learning and Development.

In addition, the SID Deputy's salary and the positions in the Office of Pupil Centered Funding are paid through budget account 2673 – NDE Office of the Superintendent; and funding for contractor positions is provided through 2710 – NDE - COVID-19 Funding. Once ESSER and associated COVID-19 funds expire, these contract positions will be eliminated.

Exhibit 5-3 summarizes the primary SID budgets from FY 2020 through FY 2025. As shown, these two budget categories have increased over the six fiscal years, with primary increases appearing in the personnel categories.

EXHIBIT 5-3
STUDENT INVESTMENT DIVISION RELATED BUDGETS
FY 2020 – FY 2025

Code	Category	Tot FY 2020	Tot FY 2021	Tot FY 2022	Tot FY 2023	Tot FY 2024	Tot FY 2025	% Change
2719 NDE - DISTRICT SUPPORT SERVICES								
1	Personnel Services	\$1,696,717	\$1,670,212	\$1,891,110	\$1,980,243	\$2,211,553	\$2,383,600	40.5%
4	Operating	\$28,997	\$8,275	\$16,561	\$16,559	\$17,313	\$17,537	-39.5%
5	Equipment	\$7,149	\$0	\$0	\$0	\$18,432	\$0	-100.0%
11	Audit Travel and Training	\$14,988	\$10,219	\$9,701	\$9,701	\$10,089	\$9,681	-35.4%
12	Indirect Costs	\$267,973	\$288,303	\$208,399	\$215,695	\$185,392	\$202,042	-24.6%
13	Out Of State Audit Travel	\$72,000	\$36,000	\$0	\$0	\$0	\$0	-100.0%
15	Cares Act Reimbursement - Telework	\$0	\$18,400	\$0	\$0	\$0	\$0	0%
16	Cares Act Reimbursement - Contract Workers	\$0	\$17,998	\$0	\$0	\$0	\$0	0.0%
17	Esser Contract Workers	\$0	\$39,886	\$31,138	\$0	\$0	\$0	0.0%
26	Information Services	\$42,051	\$22,818	\$16,904	\$18,253	\$36,999	\$30,857	-26.6%
30	Training	\$0	\$0	\$0	\$0	\$7,300	\$7,300	100.0%
58	Computer Equipment Sb500	\$0	\$0	\$0	\$0	\$7,212	\$233	100.0%
82	Department Cost Allocation	\$7,552	\$7,882	\$7,854	\$7,854	\$6,113	\$6,113	-19.1%
87	Purchasing Assessment	\$54	\$155	\$271	\$487	\$203	\$203	275.9%
88	Statewide Cost Allocation Plan	\$5,795	\$4,772	\$0	\$0	\$0	\$0	-100.0%
93	Not Described	\$0	\$59,643	\$0	\$0	\$0	\$0	-100.0%
	Total 2719 - NDE - DISTRICT SUPPORT SERVICES	\$2,143,276	\$2,184,563	\$2,181,938	\$2,248,792	\$2,500,606	\$2,657,566	24.0%
2720 - NDE - DEPARTMENT SUPPORT SERVICES								
1	Personnel	\$1,416,116	\$1,457,877	\$1,455,752	\$1,508,934	\$1,584,754	\$1,788,670	26.3%
3	In-State Travel	\$0	\$2,412	\$2,412	\$2,412	\$2,412	\$2,412	100.0%
4	Operating Expenses	\$631,906	\$594,094	\$529,113	\$581,937	\$668,313	\$577,796	-8.6%
5	Equipment	\$4,766	\$0	\$0	\$0	\$13,824	\$0	-100.0%
14	Smartsheet	\$0	\$0	\$0	\$0	\$50,000	\$50,000	100.0%
15	Cares Act Reimbursement	\$0	\$21,657	\$0	\$0	\$0	\$0	0.0%
26	Information Services	\$838,400	\$1,051,266	\$627,275	\$700,406	\$418,482	\$308,596	-63.2%
70	Salary Transfers	\$407,328	\$412,720	\$409,128	\$425,139	\$457,620	\$467,309	14.7%
82	Dept Cost Allocation	\$7,332	\$7,653	\$7,106	\$7,106	\$5,240	\$5,240	-28.5%
86	Reserve	\$1,512,799	\$1,480,182	\$307,963	\$510,480	\$1,641,494	\$1,784,731	18.0%
87	Purchasing Assessment	\$7,116	\$11,857	\$7,912	\$1,265	\$537	\$537	-92.5%
88	State Cost Allocation	\$154,015	\$101,396	\$147,868	\$126,941	\$178,663	\$188,074	22.1%
89	Ag Cost Allocation	\$278,222	\$321,848	\$394,251	\$275,005	\$309,841	\$232,012	-16.6%
	Total 2720 - NDE - DEPARTMENT SUPPORT SERVICES	\$5,258,000	\$5,462,962	\$3,888,780	\$4,139,625	\$5,331,180	\$5,405,377	2.8%

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

openbudget.nv.gov/OpenGov/ViewBudgetDetail.aep?amountView=Year1&type=Exp&budgetVersionId=25&version=Leg&view=Division&departmentCode=30.

Board and Commissions

SID provides support for two committees: the Committee to Oversee the Charter School Audit List (COSAL) and the Commission on School Funding.

Committee to Oversee the Charter School Audit List

The governing bodies of charter schools and/or university schools for profoundly gifted pupils must annually audit their respective charter schools and/or university schools; these audits must be performed by a certified public accountant from a list developed by the Committee to Oversee the Charter School Audit List (COSAL).

NDE then reviews the annual audit of each charter school and university school for profoundly gifted students, which must be conducted in accordance with the standards outlined in the Charter School Audit Guide.

The SID Audit Unit is responsible for working with COSAL and the Audit Manager is an appointed member of the committee. The Audit Unit's Administrative Assistant provides administrative support to the committee as a whole.

Commission on School Funding

The Deputy Superintendent and the State Education Fund Manager in the Office of Pupil Centered Funding with the support of the Specialist staff support the Commission on School Funding.

Senate Bill 543 (2019) created the 11-member Commission on School Funding to guide NDE's work to revamp Nevada's K-12 education funding formula for the first time in over a half-century. The Commission's responsibilities are summarized as follows:

- Providing guidance to school districts and NDE on the implementation of the Pupil-Centered Funding Plan.
- Monitoring the implementation of the Pupil-Centered Funding Plan and making any recommendations to the Joint Interim Standing Committee on Education to improve the implementation of the Pupil-Centered Funding Plan
- Reviewing the base per pupil funding amount, the adjusted per pupil funding for each district, and the multiplier for weighted funding for each category of students and recommending revisions as they determine to be appropriate.
- Reviewing state laws and regulations related to education and making recommendations to improve the efficiency and effectiveness of public education.
- Reviewing and making recommendations relative to the Pupil-Centered Funding Plan's equity and cost adjustment factors, which include those for each county, small school, and small district.
- Reviewing the academic progress made by pupils in each public school since the implementation of the Pupil-Centered Funding Plan.

Reviewing and considering strategies to improve the accessibility of existing and new programs for pupils within and between public schools. Source: NRS 387.12463

State Agency Interactions and Dependencies

As an agency of the state of Nevada, NDE receives services and oversight from other state agencies which are central to governmental administration. It is especially important to understand that NDE does not have its own Human Resources Division; all payroll, classification systems, and compensation rates are administered by the Department of Administration for all state agencies. NDE must also use the state's HR Performance Evaluation process. While not inclusive of all other state agencies, **Exhibit 5-4** provides an overview of the agencies with whom SID staff have more regular interactions.

EXHIBIT 5-4
NEVADA STATE AGENCIES SUPPORTING NDE

Agency	Role and Responsibility
Department of Administration Human Resource Management	<ul style="list-style-type: none"> Establishes compensation and classifications plans and provide job descriptions for each type of classification in the state Establishes benefits and contribution rates Posts all job openings Handles new hire processing and terminations Processes all payroll for the state Maintains personnel records
Department of Administration Purchasing Division	<ul style="list-style-type: none"> Maintains statewide purchasing guidelines and signs off on requisitions entered into the Advantage system Maintains fixed asset accounting statewide Maintains vendor files Assists in the competitive bidding processes
Governors' Finance Office	<ul style="list-style-type: none"> Works with agencies to create their biennial budgets Conducts internal audits Monitors revenues and agency expenditures to ensure the state budget remains balanced and in compliance with federal and state regulations
Public Employees' Retirement System	<ul style="list-style-type: none"> Administers the retirement system for all Nevada government employees Maintains accounts and contributions from current employees and employers Distributes retirement benefits upon retirement
Public Employees' Benefits Program	<ul style="list-style-type: none"> Administers a group health and life insurance program which offers comprehensive medical, prescription drug, dental, vision and life insurance for state employees and their dependents The 10-member board appointed by the Governor adopts regulations, Nevada Administrative Code (NAC), enforcement, and policy for the agency In addition to employee and State contributions, agencies are assessed a proportionate share of the cost of the program's operation
Comptroller's Office	<ul style="list-style-type: none"> Administers the state's accounting system, registering vendors, settling all claims against the state and collecting debts owed to the state Processes and records the state's financial transactions, conducts the final audit and ensures compliance with Nevada Constitution, federal laws and state statutes and issues statewide financial reports NDE processes invoices for payment, which the Controller reviews and approves prior to payment
State Treasurer's Office	<ul style="list-style-type: none"> Processes all payments for state agencies Records all revenues collected by state agencies

Source: Nevada State Government website: <https://nv.gov/>.

FINDING

The grants management functions within NDE are separated between financial management under SID and programmatic management in the other divisions; the absence of adequate accountability and consistent adoption of mutual procedures has led to the duplication of effort and conflicting communications with subrecipients.

The Office of Division Compliance and the Grants Management Unit (GMU) within SID's District Support Services Offices handle specific components of the grants management function, while program areas throughout the agency handle the programmatic components.

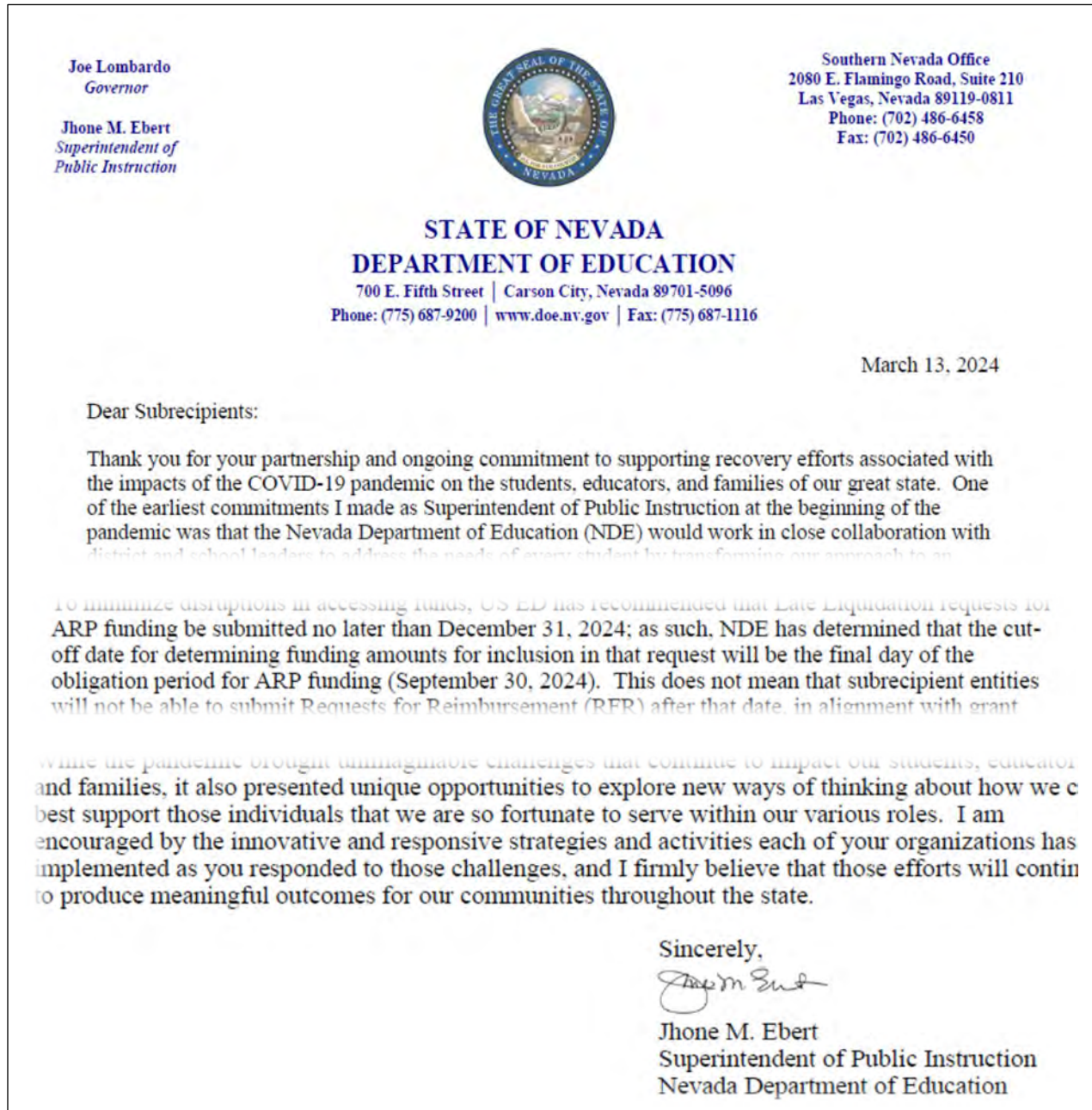
In 2015, NDE created the GMU to address an audit finding that there was not sufficient separation of duties within the fiscal components of the grant management process and the program areas. Only the IDEA grants are administered separately by the program area, which is a concern as this program receives significant federal funding and non-compliance could result in NDE being vulnerable to federal audit findings and state sanctions. This area has been unwilling to move their grant manager to GMU as they are concerned with meeting IDEA programmatic requirements.

Over time, the roles and responsibilities of the program areas have changed as have the state and federal grant requirements, and employee turnover in key positions has impacted the consistency with which the program areas monitor and support the subrecipients.

According to staff, for the last four or more years, conflicting communication with subrecipients originating from GMU and then countermanded by the Office of Student and School Supports (OSSS) resulted in a group of subrecipients losing grant funds that were not claimed for reimbursement within the federal guidelines. As evidence of the Superintendent's directive to schools, **Exhibit 5-5** contains excerpts from the three-page letter signed by the Superintendent in March 2024. Clearly, any new instructions for subrecipients on this topic that countermanded directions from the Superintendent originating from any NDE office should have come from the Superintendent explaining the reasoning for the change. That did not happen.

Program offices, in dialogue with their deputy, must still provide guidance to subrecipients on an ongoing basis. Coordination between offices prior to issuing guidance is needed to prevent conflicting communications.

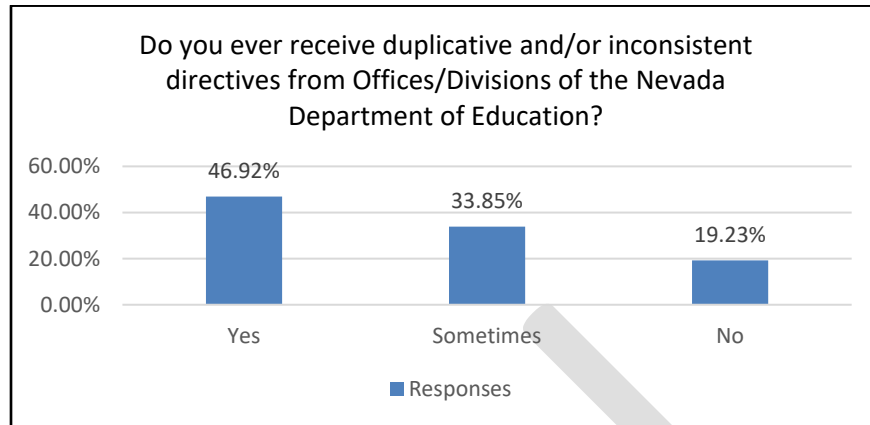
EXHIBIT 5-5
SUPERINTENDENT'S LETTER
MARCH 2024



Source: NDE, January 2025.

As shown in **Exhibit 5-6**, more than 46 percent of respondents to the LEA survey conducted by Public Works LLC said they received duplicative and conflicting instructions from NDE. Comments from the LEAs on this topic frequently mentioned grants and the inconsistencies in the directives.

EXHIBIT 5-6
LEA SURVEY RESPONSES



Source: Public Works Survey of LEAs, October 2024.

Public Works LLC identified four basic causes for the complaints and communication breakdown:

1. There are no normed and mutually implemented procedures across offices at NDE which reflect up to date practices and clearly identified roles.
2. Current policy/procedures are not written in a user-friendly manner that provides specific steps and procedures.
3. Insufficient oversight of communications being sent to the subrecipients.
4. Duplicative elements of the risk assessments and programmatic monitoring and data requests that have in the past placed a burden on subrecipients.

Policies and Procedures

NRS 233b requires state agencies to have a rules of practice document for all formal and informal procedures, including a description of all forms and instructions used by the agency. Further, these rules of practice are to be made available to the public.

The Office of Division Compliance and the Office of District Support Services have documented procedures for the grant-related activities performed. While individual offices have documented procedures specific to how their office manages grant-related activities, there are no normed and mutually implemented procedures across offices. The Office of Division Compliance recently began an effort to document internal policies and procedures with collaboration across the agency to ensure adherence to internal controls, improve efficiency, and ensure consistent communications to subrecipients. Once procedures have been documented, the intent was to provide an internal grants manual to agency staff and an external grants manual to subrecipients, interlaced with internal controls and authorizing state and federal statutes. Each office was asked to designate a representative for this effort.

The Office of Division Compliance provided the table of contents for the updated grant policies and procedures listed below. This outline represents domains of grant management previously identified for documentation in earlier policies and procedures that presently do not reflect current NDE practice or state and federal requirements, and are not widely accessed or implemented across the agency due to

their defunction. The Office of Division Compliance provided Public Works copies of working revisions to the first three documents:

- 10.1 Grant Applications
- 10.2 Funding Opportunities
- 10.3 Subaward Review and Approval, Revisions and Amendments
- 10.4 Requests for Reimbursement, Final Financial Reports
- 10.5 Programmatic Monitoring
- 10.6 Financial Monitoring
- 10.7 Corrective Actions
- 10.8 Time and Effort
- 10.9 Federal Grant Management
- 10.10 Grant Funded Equipment and Property Management, Real Property
- 10.11 Match, Maintenance of Effort, Earmarking
- 10.12 Allowability, Indirect and Administrative Costs
- 10.13 Cost Principles, Fringe and Employee Benefits, Travel
- 10.14 Evidence and Grant Reporting

The working drafts provided to Public Works were content-only and did not document the separation of duties across domains, flow charts, checklists, or clear instructions / user hints and tips. However, as the working drafts have evolved, NDE has identified a consistent system for providing information to include how duties are identified and assigned across domains, checklists, flow charts, supporting hints/tips documents, and clear documentation and instruction. Relevant citations to the Nevada Grants Management Manual should be included. The state's Grant's Management Manual contains active links to laws, rules, and instructions for agencies. This manual provides an outline of best practices and makes general reference to basic grant requirements, but includes instruction that agencies develop grant policies and procedures responsive to the base requirements of the manual. NDE issues more grants than other state agencies, and the complexity and scale requires significant policy beyond that of the Grants Manual.

Participation and feedback across all offices have been limited, and not all designated representatives attend or participate. Consequently, the issuing of policy documents has stagnated. Consequently, the policy documents at this point contain no agreed-to division of responsibility between the groups. Without this basic division of duties being accepted and embraced by all groups within the agency, progress in bridging the gap between SID and the program areas cannot be closed.

Communication: GMU, Compliance, and various programmatic offices meet regularly with subrecipients; however, there are no opportunities for cross-functional grants management offices to discuss matters of mutual concern.

There is no stipulated and enforced chain of command for the vetting of communication being sent to subrecipients to ensure consistency. The fact that one program area sent communication regarding the liquidation of grants to subrecipients that countermanded the initial instructions sent through GMU and signed off on by the Superintendent is a prime example of this problem. Had this program area discussed the issue in advance with the SID offices and the Office of the Superintendent, the problem could have been avoided.

Federal and state grants are nationally recognized methods for distributing funds to schools. Consequently, every state in the nation must deal with grants management issues. Many states issue a grants management manual that provides subrecipients guidance on each phase of the process, thereby eliminating the need for some ad hoc notices.

For example, the Ohio Department of Education and Workforce has an online manual at:

<https://education.ohio.gov/getattachment/Topics/Finance-and-Funding/Grants-Administration/Managing-Your-Grant/Managing-Your-Grant.pdf.aspx?lang=en-US>.

The Massachusetts Department of Elementary and Secondary Education publishes a manual online and the Table of Contents is found in **Exhibit 5-7**.

EXHIBIT 5-7
MASSACHUSETTS GRANTS FOR SCHOOLS MANUAL
TABLE OF CONTENTS

Grants for Schools: Getting Them and Using Them, A Procedural Manual

I. How Grants Are Made Available

- A. [Request for Proposals Process](#)
- B. [Components of the Request for Proposals](#) [Flow Chart](#)
- C. [Kinds of Grants Available](#)
- D. [Components of the Grant Application](#)

II. How to Complete the Grant Application

- A. [Guidelines for the General Applicant Section \(Part I\)](#)
- B. [Guidelines for the Budgetary Information Section \(Part II\)](#)
- C. [General Guidelines](#)

III. How Grants Are Awarded

- A. [Application Review](#)
- B. [Approval](#)
- C. [Awarding Grants](#)
- D. [Appeals Process](#)

IV. How to Manage Grants

- A. [Request for Funds Process](#)
- B. [Amendment Process](#)
- C. [Final Reporting Process](#)
- D. [Unexpended Funds and Preliminary Expenditure Review](#)
- E. [Evaluation](#)
- F. [Financial Audit](#)

Source: Massachusetts Department of Elementary and Secondary Education,
<https://www.doe.mass.edu/grants/procedure/manual.html#i-d>.

Due to the continuation of siloed work and a lack of follow-through on aligned internal processes, NDE will not be able to develop or distribute a manual of this sort, which is integral to effective and efficient

administration of taxpayer resources. The pinnacle of managing funds is to minimize waste and misuse of funding. As noted in this report, various offices across SID and programs have published documents for subrecipients concerning their part in the process, but these documents continue to conflict with one another, and efforts to produce a comprehensive manual continue to be stymied.

Monitoring and Risk Assessments

The need for risk assessments and other monitoring activities is found in 2 CFR (Code of Federal Regulations), the state's Grants Management Manual, and various other codes and regulations. NDE is conducting the following monitoring and risk assessments related to grants:

- A Pre-Assessment Award – required prior to grant award.
- A Programmatic Risk Assessment – conducted as a single assessment responsive to all program elements across the agency to support identification for technical assistance and programmatic monitoring. Led by the Office of Student and School Supports with a cross-office working group with representatives across the agency.
- Financial Monitoring – conducted by the Office of Division Compliance.

LEAs and NDE staff told Public Works that documentation requests for Financial Monitoring can result in 200 to 6,000 pages of PDF documents. They further indicated that some of the requests from the entities conducting these risk assessments are duplicative, while some documents are required from LEAs for other purposes not related to grants. According to NDE staff, the two risk assessments have been extensively cross walked to eliminate duplicate request. Public Works is not questioning the need for some or all of the information being reviewed as part of these risk assessments; however, the lack of coordination for these requests and poor recordkeeping, which was brought up as an area of concern in an internal audit released in January 2018 (Report 18-06), contributed to the onerous and duplicative nature of the requests. In response, SID staff said they have cross-walked the data requests made for the fiscal monitoring process with the program areas and have eliminated duplicate requests and improved overall record keeping. Yet both LEAs and NDE staff continue to raise concerns in this area.

The lack of cooperation, prioritization, alignment, and open communication between the SID and program areas has led to a dysfunctional grant management process agencywide. Work in this area was already initiated through the work of the District Management Group (DMG). Each office has worked on separate efforts which has caused further confusion. SID has specific recommendations that can be referred to for guiding the immediate next steps. However, without commitment, alignment, and prioritization, the agency and its subrecipients will continue to not meet expectations.

The Forbes Human Resources Council members published the following best practices of help teams and organizations build stronger, more collaborative connections that truly drive results:⁸¹

1. *Have A Shared Sense of Achievement Across Functions* - each function to understand how their goals dovetail and are dependent on those of other functions or departments.
2. *Establish Clear Communication Channels*
3. *Get Leaders To Lead The Charge*
4. *Put Common Goals At The Forefront*
5. *Create Virtual Team Spaces*

⁸¹ <https://www.forbes.com/councils/forbeshumanresourcescouncil/2025/01/03/20-best-practices-for-strengthening-cross-departmental-collaboration/>.

6. Host Workshops To Promote Cross-Departmental Bonds
7. Ensure Everyone's Voice Is Heard
8. Establish A Cross-Departmental Peer Group
9. Make Cross-Departmental Team Projects Visible To All
10. Establish A Shared Vision
11. Gain A Clear Understanding Of Each Department's Needs And Functions
12. Establish Temporary Task Forces
13. Make Peer Interactions Part Of Job Training
14. Set Up One-On-One Meetings With Department Leaders
15. Create A Center Of Excellence
16. Make Knowledge Sharing And Ideation
17. Identify Interdepartmental Dependencies
18. Create 'Collaboration Forums'
19. Foster A Culture Of Shared Ownership And Independence
20. Understand Individuals' Strengths And Roles

While each of these practices is important, it is clear that the commonality between the individual tasks revolve around respecting and acknowledging the work of each contributing office within the organization and establishing the tools and opportunities for honest and continual exchange of information.

COMMENDATION 5-C:

The Office of Division Compliance and Office of District Support Services are commended for attempting to update the existing policies to ensure more consistency in the grants management processes.

RECOMMENDATION 5-1:

Begin a renewed policy and procedure revision process by establishing a joint goal for the project among all participants and ensure that the Deputies and Superintendent make it clear that participation by the program areas is not optional.

RECOMMENDATION 5-2:

Reconsider the decision to allow the IDEA grants to be administered separately by the program area to ensure consistency and compliance.

This effort should be initiated by the Superintendent under the leadership of a third-party facilitator due to the structural organization and reporting arrangements. The Deputies and the Superintendent should make it clear that participation is not optional and that regular reports on progress will be expected. Minutes of meetings should be taken.

At a minimum, the efforts should:

- Establish accountability measures to ensure participation and collaboration between and among the various groups.
- Clearly define the roles and responsibilities of each office.

- Provide clear and understandable steps for each process which can then be used for internal training purposes.
- Establish protocols for issuance of communication to subrecipients.
- Ensure that requests for data are required, are not onerous, and do not suplicate requests made in other areas of the agency.
- Establish a records management design that promotes the intra-agency sharing of data obtained from the subrecipients.

Final policy and procedure recommendations should be reviewed and signed off on by all participants and their Deputies prior to submission to the Superintendent for final approval.

RECOMMENDATION 5-3:

Create an agency Grants Management Manual that guides the subrecipients through the process and serves as a resource for planning and compliance purses.

Based on the internal policies and procedures, participants should work jointly to translate the internal procedures into an agency user manual. Once drafted, the contents should be provided to subrecipients for their comment on the useability of the manual and the feasibility of the requirements.

FISCAL IMPACT

Organizations like the National Governors Association (NGA), Council of Chief State School Officers (CCSSO), and National Education Association (NEA) may offer resources, toolkits, and even direct support for creating policies and procedures for a nominal fee.

Another option is that NDE could use a third-party facilitator to lead the policy and procedure documentation process. There would be a one-time estimated cost of \$50,000 for multiple sessions, drafting, and gathering feedback internally. If, after the initial documents have been developed and an internal leader has not emerged, another session may be needed to facilitate and lead discussions with subrecipients in the creation of a Grants Management Manual at additional cost.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30	One-Time Cost
Contract for third-party facilitation of the policy and manual creation processes	\$0	\$0	\$0	\$0	\$0	(\$50,000)

OFFICE OF FISCAL OPERATIONS

The Office of Fiscal Operations is responsible for all financially related activities conducted by the NDE. These activities include biennial budget building, budget maintenance, accounting, accounts payable, accounts receivable, and contracting.

Budgets: This unit is responsible for compiling and preparing the biennial budget for NDE, working with and through the Governor's Finance Office. Included in the annual NDE budget is the state's share of educational dollars that flow out to the school districts and charter schools. This unit is also responsible

for monitoring, organizing and balancing agency/program requests; reviewing and making recommendations on work program changes; and analyzing the impact on existing and future agency budgets.

Accounting: The Accounting unit is responsible for processing payments to vendors and schools and recording the revenues and expenditures of the agency in the statewide Advantage system, entering expenditures and requests for reimbursement into the accounting system for payment, making journal entries upon the request of the Budget Unit, and making and recording deposits.

Contracts: This area oversees and monitors contracts for the agency, ensures that the requestor has done what is required, and assists with competitive procurement. A “request to initiate” form must be completed before the process begins. Additionally, this area facilitates getting signatures from vendors and the internal people and processing the request through the state chain of command.

Exhibit 5-8 provides the organizational structure for Fiscal Operations.

**EXHIBIT 5-8
FISCAL OPERATIONS OFFICE ORGANIZATION**



Source: Nevada Department of Education, Student Investment Division, February 2025.

FINDING

The Contract section in Fiscal Operations has documented procedures and forms to guide their work and has taken action to improve overall efficiency.

The Contract section is staffed by a Contracts Manager (Management Analyst II) and a Management Analyst I that reports to the Manager. This section administers and tracks all contracts for the agency. The three types of contracts include:

- Contract under \$100,000 which the agency can process internally;
- Contracts above \$100,000 which are processed through the State Purchasing Office; and
- Contracts for services made under an existing state contract or under a bid issued by another agency or state.

The contracting process begins when a requester within the agency submits a form requesting permission to contract. The process can take from a few days to a few weeks to get all the approvals.

When the new Contracts Manager was initially hired, there were boxes of paper copies of contracts. To begin the reorganization, the contracts team conducted a records clean-up following state guidelines for record retention.

The Advantage System 2.0 does not track contracts, show how much has been paid to the vendor, or what remains on the contract. The Contract section said that Advantage 4.0 may have this capability, however, it was their understanding that the Contracts' module of Advantage 4.0 would not be implemented until a later date not yet published by CORE,NV. To ensure that contracts were not over or underpaid, the section developed and is now maintaining a Declining Balance Log that tracks what has been paid and what is left on each contract for the year.

The Purchasing Office within the State Department of Administration provides purchasing policies and procedures for the state. At the time of this review there were few internal procedures for NDE; however, work was in progress to begin that documentation process. Final documentation cannot be completed until Advantage 4.0 is implemented and the Contract module is activated.

COMMENDATION 5-D:

The Contracts section is commended for their efforts to organize the section by organizing and clearing out old paper files according to the records retention guidelines and for developing the Declining Balance Log to track contract payments.

FINDING

The Fiscal Operations Office has been seriously hampered by the use of Advantage 2.0, the statewide finance system. With the implementation of Advantage 4.0, there are opportunities for eliminating manual processes and improving efficiencies.

Advantage 2.0, unlike standard Enterprise Resource Planning software, only dealt with the financial processes of the state such as purchasing, payroll, fixed asset accounting, accounts receivable and payable, and the recording of revenues and expenditures. Because of the system capabilities, many of the processes within Fiscal Operations are manual, driven by an exchange of emails and verbal communication. For example, several payment errors to LEAs and charter schools were noted during

interviews. The system had no internal process that would reconcile a batch or group of items entered, therefore, a manual check-off process is used to validate the information entered. Staff provided examples of miscoded payments, transposition errors resulting in the issuance of checks for a few cents, and individual payments provided in a spreadsheet list that were overlooked during data entry. The approval process for payments, purchase orders, and other fiscal transactions within SID include Pend 3 and Pend 4 approvals as follows:

- Pend 3: Fiscal Operations Accounting staff check for basic budget, coding, etc. and enter the request into Advantage.
- Pend 4: Final higher-level approvals –Program Officer I, Accounting Assistant III, Budget Analyst, or Director.

There is no official Pend 1 or 2, but the initial request is issued in the divisions and generally approved by a department head or supervisor before the request is sent to Fiscal Operations. The State Controller's Office gives the final approval of Pend 5.

Every purchase order coming through the Accounting Team must be approved by them (Pend 3). Their role is to make sure the requestor has the authority to spend the money.

Most everything starts with emails and PDF copies of requests. This is saved into the share drive's Pend 3 folder. Once the Pend 3 approval is given, staff physically move the request into the Pend 4 folder. Once approved, staff release the request to the Comptroller for processing. According to the staff, there have been instances where documents or folders have been deleted, and they have no backup.

From a records management perspective, there are large boxes of paper documents that are waiting to be scanned. Some have been scanned, and some have not.

Staff said that three years ago, everything was paper and walked to Fiscal Operations, so getting emails now with PDF documents has improved the process.

Exhibit 5-9 provides NDE staff responses to the Public Work survey regarding Fiscal Operation's functions. As shown, of those providing an opinion, the responses are generally negative.

EXHIBIT 5-9
NDE STAFF SURVEY RESPONSES - QUESTION 11

Q11 To what extent do you consider the following practices in place:						
Answered: 108 Skipped: 1						
	NOT IN PLACE	PARTIALLY IN PLACE	NO OPINION/DONT KNOW	MOSTLY IN PLACE	FULLY IN PLACE AND IMPLEMENTED	TOTAL
Purchasing procedures and guidelines are clearly documented.	12.15% 13	23.36% 25	41.12% 44	17.76% 19	5.61% 6	107
When I need assistance with a purchase I know who to call.	13.21% 14	24.53% 26	36.79% 39	19.81% 21	5.66% 6	106
Fiscal Operations provides timely customer service to NDE staff.	26.85% 29	25.00% 27	34.26% 37	9.26% 10	4.63% 5	108
Fiscal Operations provides timely customer service to vendors.	19.44% 21	18.52% 20	50.00% 54	9.26% 10	2.78% 3	108
The legal requirements of the procurement process is understandable.	8.33% 9	25.00% 27	46.30% 50	14.81% 16	5.56% 6	108
When entering into a contract, the process is clearly defined.	12.96% 14	19.44% 21	49.07% 53	13.89% 15	4.63% 5	108
The process for requesting travel reimbursements is clearly defined.	12.96% 14	22.22% 24	25.00% 27	29.63% 32	10.19% 11	108
Travel reimbursement is received in a reasonable amount of time.	29.63% 32	20.37% 22	31.48% 34	12.04% 13	6.48% 7	108

Source: Public Works NDE Staff Survey, December 2024.

In recent months, the SID Deputy contracted with the former Deputy to assist in streamlining the Fiscal Operations processes. Smartsheets are now being used to track incoming purchase requests, and a dashboard has been developed so that SID staff are able to see the pending transactions and determine where they are in the process. NDE users have access to a less detailed dashboard with progress information on their requests. According to the Deputy, having this third-party view of the processes is having a significant positive impact on the unit's operations.

The state recognized the limitations of Advantage 2.0 and on January 2, 2025, implemented the main functions of Advantage 4.0. Finance staff were offered training on the new system, and while onsite in October 2024, some, but not all, staff had attended the training. Those that had attended training said the new system would automate many of the manual processes. An attempt to obtain copies of the training or a side-by-side illustration of the difference between Advantage 2.0 and Advantage 4.0 from the Comptroller's Office or the state's Information Technology group were unsuccessful. According to the SID Deputy, the Advantage 4.0 conversion did occur on January 2, 2025, and as expected, they are still working out some of the kinks in the system.

There is a tendency in organizations to attempt to force a new or upgraded system to do what the previous system did—in other words, to attempt to maintain the status quo. Best practices related to an organization's implementation of a major system upgrade include the following:

1. Understanding and documenting the new system capabilities relative to each business function (i.e., purchasing, payroll, payment processing, budgeting, budget monitoring, revenue recognitions, etc.).

2. Identifying paper and manual processes that can and should be eliminated or revised for compatibility with the new system.
3. Documenting the desired workflow (step-by-step procedures) for each business function based on the new system capabilities.
4. Providing departmental and user training on the enhanced system and procedures.
5. Implementing a feedback and support process for users as they learn the new processes and procedures.

Embracing the new system in this way can allow the organization to streamline existing processes, eliminate redundancies in the process, accelerate the processing time, and much more.

RECOMMENDATION 5-4:

Continue the practice of the former Deputy to review all Fiscal Operations processes and procedures based in the capabilities of Advantage 4.0 and use this opportunity to streamline processes and improve the accuracy and efficiency of this office.

This comprehensive review should be aided by the former Deputy who is already familiar with the unit operations and the financial processes and procedures in Nevada.

In the process, management should carefully examine staffing levels in each of the areas to determine if staffing levels and skill sets remain appropriate to the business function being performed.

FISCAL IMPACT

Extending the current contract to include the analysis of processes relative to the Advantage 4.0 implementation should have a cost of not more than \$20,000.

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30	ONE-TIME COST
Conduct a comprehensive review of Fiscal Operations processes	\$0	\$0	\$0	\$0	\$0	(\$20,000)

FINDING

The Fiscal Operations office is not reconciling and recording revenues received from outside sources in a timely and accurate manner.

Fiscal Operations is notified by the Treasury when revenues are received without adequate information with which to record the payment. Staff must then research and code the revenues to the appropriate account. The Treasury has an online request that NDE must fill out with the coding information and then Treasury will record the revenue. According to staff, at the time of the onsite review there were approximately 20-30 payments backlogged. A list of the backlogged payments was not provided. The section head is primarily responsible for clearing the revenues with some assistance from her staff.

When the revenue cannot be identified, the money is held by the Treasurer in the State's general account; however, the accounts receivable has not been cleared and may result in NDE sending

additional notices for payment. During interviews, the section head said several of the unidentified payments come from GMU.

In discussions with GMU staff, they indicated that lists (Excel spreadsheets) are sent to Fiscal Operations stipulating which of the grant subrecipients are being asked to send back funds and to which accounts these payments should be recorded. They said that the information is sent to Fiscal Operations via email, and follow-up emails are sent when payments do not show up in a timely manner. By statute, GMU has the right to withhold future payments to the subrecipients if the repayment is not made. In several instances, the staff said they have withheld future funds and then been notified by the subrecipients that payment had been made. Further investigation showed the Treasurer was holding the payment due to lack of identification.

During interviews, there was no indication that calls or emails were being sent to the sender to ask them what the payment or payments were for.

The Government Finance Officers Association (GFOA) best practices relating to Revenue Controls contains the following excerpts relating to the timely identification and recoding of revenues [emphasis added]:

A revenue control and management policy establishes proper control over all receipts and receivables and helps ensure sound financial management practices.

- *Depositing of received funds - Treasury management should serve as the primary recipient for all revenue collection sites. There should be timely recognition and depositing of revenue collected. Smaller governments that do not have a formal treasury function are encouraged to establish a formal single point of receipt or cashier function to control access to received funds.*
- *Due to the special nature of funds received from grants, developers, partners and other entities, governments should consider whether separate procedures should be established for recording and depositing these funds.*
- *Budgetary review responsibilities - Revenue collections and accounts receivable should be monitored in a timely manner. Both actual and budgeted or forecast revenues should be monitored. Any significant variance of actual from the forecast or budgeted revenues should be investigated thoroughly.*

The Fiscal Operations process for identifying and properly recording revenues in a timely manner is hampered by the following:

- Insufficient staff dedicated to the clearing of unidentified revenues and insufficient focus on the importance of timely recording of revenues.
- Incidences where the office is not properly notified that a payment is expected, for what purpose, and the name of the payee.
- Lack of a dedicated and documented process for all offices to follow when notifying Fiscal Operations that payments are expected.
- Lack of follow-up with the sender to determine what the payment is for.

RECOMMENDATION 5-5:

Develop a procedure for notifying Fiscal Operations of accounts receivables and impending payments and for the prompt recognition and recording of revenues.

NDE should develop a form or protocol for notifying the office when a receivable is set up or payment is expected, showing the sender's name, the expected amount, and the code to which the payment should be recorded. In Fiscal Operations, a position should be assigned to monitor incoming payments and a goal set to record payments within five days of receipt. If an unidentified payment comes in and a form has not been submitted, Fiscal Operations should immediately contact the sender by phone or email and ask for additional information. Areas that chronically do not provide the information to Fiscal Operations should be notified and held accountable for following the procedure.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

As of October 9, 2024, NDE had not successfully submitted the Agency's 2025-27 Biennial Budget request to the Governor's Finance Office (GFO), which was due by 4:00 PM on August 30, 2024.

In every even year, the NDE's Leadership and Budget Team works on building the agency's Biennial Budget. In March 2024, the GFO Budget Division began working with state agencies to prepare the FY2026-FY2027 agency request budgets, which according to the GFO Budget Building Manual, 2025-2027 Biennium:

"In accordance with the State Budget Act, all agencies must complete the data entry of their 2025-2027 Agency Request Budget into the Nevada Executive Budgeting System (NEBS) by 4:00 PM on Friday, August 30, 2024. This is a statutory deadline (NRS 353.210) which cannot be changed or extended."

The NDE budget includes the agency budget and the state's support for the schools for which NDE is the conduit. The budget submission begins the process, which includes several milestone reviews and approvals prior to the state's adoption of the final budget:

1. Following submission, the Governor's Finance Office goes through each budget to ensure accuracy.
2. The Legislative Council Bureau reviews for accuracy and asks for justifications.
3. The Governor sets priorities; may cut or add based on those priorities.
4. The Legislature as a whole reviews and approves the final statewide budget.

Exhibit 5-10 provides NDE staff responses to the Public Works survey administered in December 2024. As shown, 40 percent of staff indicated that they know who to call with budget questions (mostly in place or fully in place). Responses to the remaining questions were less positive.

EXHIBIT 5-10
NDE STAFF SURVEY RESPONSES – QUESTION 9

Q9 To what extent do you consider the following practices in place:						
Answered: 108 Skipped: 1						
	NOT IN PLACE	PARTIALLY IN PLACE	NO OPINION/DON'T KNOW	MOSTLY IN PLACE	FULLY IN PLACE & IMPLEMENTED	TOTAL
When I have budget or finance-related questions I know who to call.	7.41% 8	33.33% 36	19.44% 21	25.00% 27	14.81% 16	108
When I ask for assistance with financial or budget-related issues, I receive the help I need.	13.89% 15	25.93% 28	22.22% 24	27.78% 30	10.19% 11	108
I receive the help I need in a timely manner.	17.76% 19	33.64% 36	16.82% 18	22.43% 24	9.35% 10	107
Financial forms have clear instructions on how to complete them.	17.59% 19	24.07% 26	35.19% 38	20.37% 22	2.78% 3	108
At the end of the year, I receive clear instructions for the fiscal year close out.	16.67% 18	20.37% 22	49.07% 53	7.41% 8	6.48% 7	108

Source: Public Works NDE Staff Survey, December 2024.

Open ended responses to the question, “If you could improve one aspect of the budget creation and closeout processes, what would it be?” included the following general topics:

- Establish consistent and transparent communication between fiscal staff and other departments, ensure timely updates and clear direction to avoid confusion and delays.
- Decentralize certain budget processes to individual offices and streamline workflows to reduce bottlenecks, paperwork, and inefficiencies
- Provide comprehensive, hands-on training on budget creation and management processes, ensuring all staff, including new employees, understand their roles and responsibilities.
- Develop tools like “live status tracking” and ensure budgets and processes are accessible to relevant staff for better accountability and understanding.
- Increase staffing levels in fiscal departments and focus on retaining experienced staff to improve efficiency and maintain continuity.
- Implement standardized, clear procedures and *reasonable* deadlines to improve consistency across teams and align timelines with district needs.

Fiscal Operations’ Budget Office has no budget building or closing procedures other than those generically produced by the Governor’s Finance Office. Budget maintains the vast majority of their information on Excel spreadsheets. The Governor’s Finance Office’s budget systems are the primary source of information; very little is done in terms of budget in Advantage, although this is the primary system for tracking purchase orders and payments.

According to staff, the budget build process began in a timely manner, but due to internal and external factors, the process and timeline were not adhered to. Near the final due date, the agency realized it had

not addressed several of the interim steps in the budget building process and could not meet the due date.

Staff attributed NDE's inability to meet the deadline to the following factors:

- Key leadership assigned to special project and interim leadership was unfamiliar with the process.
- Priority shifts throughout the budget build process.
- Adherence to internal timelines was not strictly enforced.
- End-of-Year closeout was also not completed in a timely way, which meant that some data needed for the budget build was not available – closeout was completed during the first week in October.
- Lack of understanding by program administrators of the process and the rationale for each step in the process.

As shown in the timetable provided in the manual (**Exhibit 5-11**), there are several interim steps in the budget submission process.

EXHIBIT 5-11
AGENCY BUDGET TIMETABLE
2025-27 BIENNIAL BUDGET

TASK	DEADLINE
NEBS open for agency data entry	3/6/2024
Governor meeting to review and approve concept BDRs	04/01/2024 - 05/31/2024
Agency submittal of Capital Improvement Project (CIP) and Deferred Maintenance requests over \$100,000 to the State Public Works Division	4/1/2024
Technology Investment Notifications (TIN) due to Enterprise Information Technology Services (OCIO)	4/1/2024
Final BDR concept presentations	06/03/2024 - 06/14/2024
Class Series Compensation Plan Requests	6/3/2024
MP-5 form for new vehicle request submitted to Fleet Services Administrator	7/1/2024
Agencies must have preliminary OCIO utilization (OCIO schedules) completed in NEBS	7/8/2024
GFO upload of payroll information for authorized Full-Time Equivalent (FTE) positions into NEBS as of June 30, 2024	Approximately 07/19/2024
Agencies must have preliminary monthly Fleet Services vehicles completed in NEBS	7/19/2024
OCIO provides schedule of approved utilizations by budget account	7/25/2024
Agencies must have FINAL OCIO utilization (OCIO schedules) completed in NEBS	7/29/2024
Governor approved non-budgetary BDRs in NEBS	7/29/2024
Non-Budgetary Bill Draft Requests (BDRs) due to LCB	8/1/2024
CIP presentations to the State Public Works Board	08/28-29/2024
Submittal of Agency Request Budget and any budgetary BDRs by 4:00 p.m.	8/30/2024
Agency Budget Hearings (Finance and Governor's Office)	Complete by 10/01/2024
Adjusted Base questions sent to agencies	11/8/2024
Adjusted Base completed (FTE reconciled; M-150 adjustments made; Vacancy Savings complete)	12/2/2024
Economic Forum Report to the Governor	12/3/2024
Updated Supplemental Appropriation Requests due	12/20/2024
Governor Recommends Budget submitted to Legislature	Mid to late January
Start of 2025 Legislative Session (NV Constitution Article 4 Sec. 2)	2/3/2025
Budgetary BDRs due to Legislative Counsel Bureau	2/21/2025
Final Economic Forum Report to Legislature	5/1/2025
Last day of the 2025 Legislative Session	6/2/2025

Source: GFO Budget Building Manual, 2025-2027 Biennium.

Some of the interim steps discussed by staff that were needed and potentially could have been done in advance to streamline the process included the creation of preliminary:

- Vendor Schedules
- Position reconciliations
- Travel logs

- Equipment Schedules
- Technology Schedules

The GFO has worked closely with NDE staff in this process, and as of October 9, 2024, the review team was told that the budget was partially submitted and the final parts would be submitted within the week.

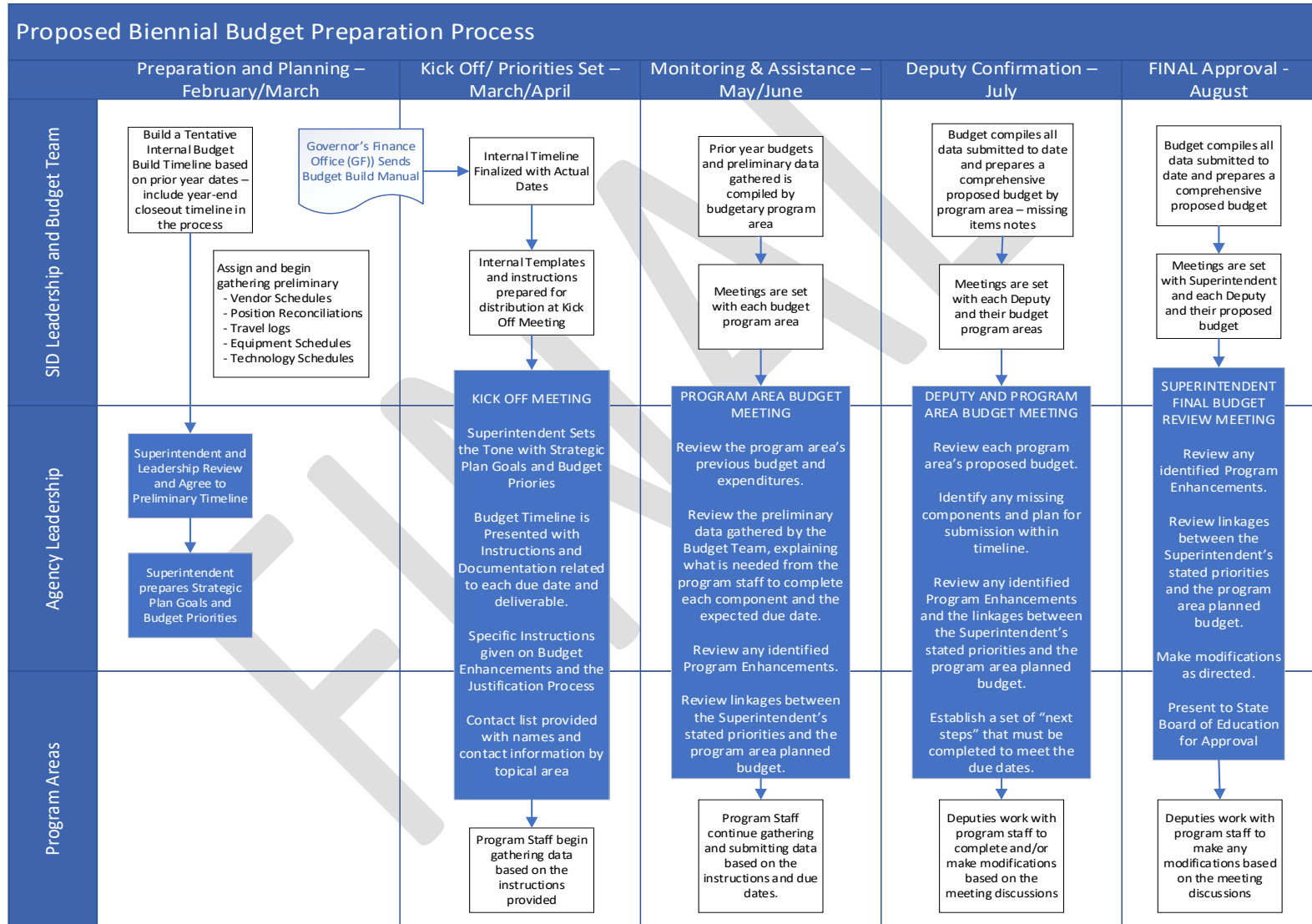
The standards and guidelines for budget preparation are outlined in the manual and are written to adhere to state law. Following the law and documented guidelines is not an option for Nevada state agencies.

RECOMMENDATION 5-6:

Implement a process whereby the Biennial Budget Building process is assigned oversight by the Deputy; is well planned, documented, and embraced by leadership; and adherence to timelines is strictly enforced.

In discussions with staff, the proposed process shown in **Exhibit 5-12** was developed for consideration.

EXHIBIT 5-12
PROPOSED BIENNIAL BUDGET PREPARATION PROCESS



Source: Compiled by Public Works Through Interviews and Feedback, October 2024.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

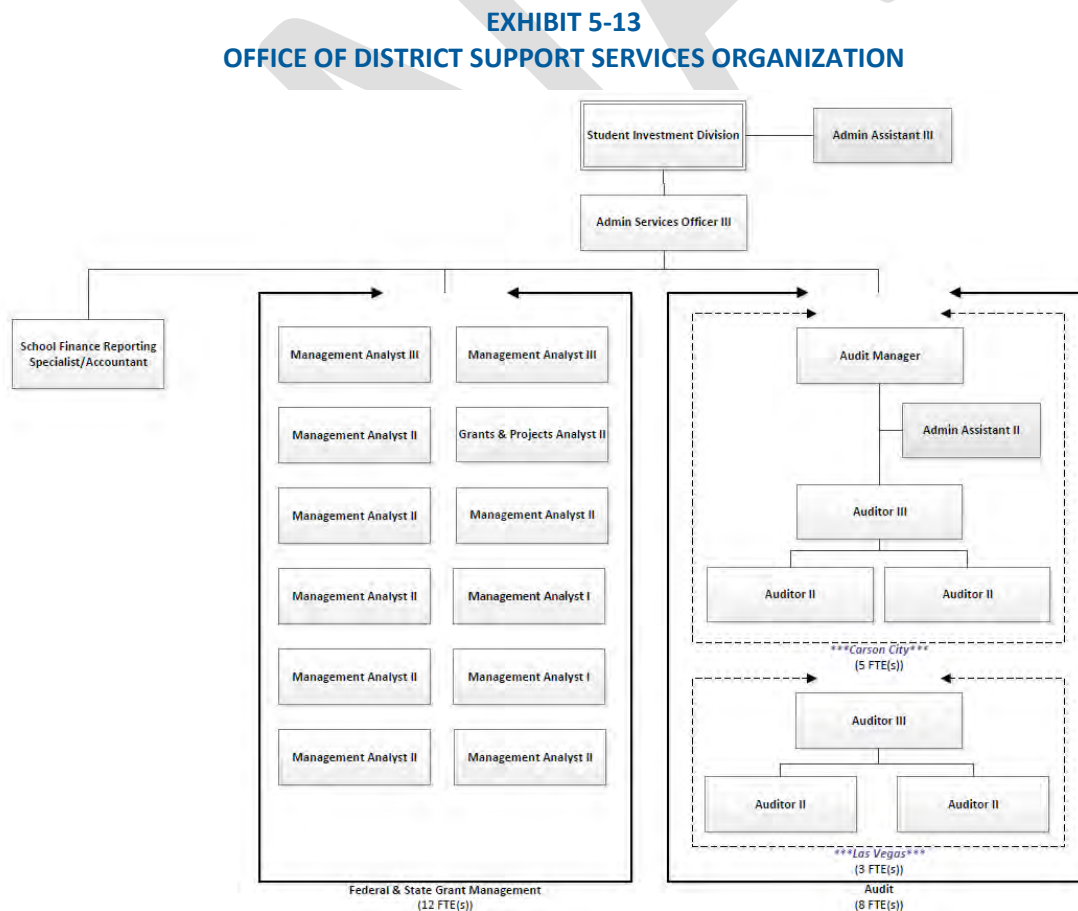
OFFICE OF DISTRICT SUPPORT SERVICES

The Office of District Support Services is organized into two units: Grants Management and Auditing.

Grants Management: All grants tracking, except the IDEA grants, were moved under this unit several years ago. This group is responsible for announcing the grants, accepting grant applications, authorizing payment reimbursement for the grants, and monitoring the grants throughout the process. Detailed procedures are in place, regular meetings with the subrecipients are held to discuss problems or issues, and calendars of events are published and distributed to ensure that districts remain aware of coming deadlines, etc.

Audit: The Audit group has three staff in the Las Vegas field office and the remaining staff are housed in the Carson City office. It is the only unit in SID with staff physically located outside of Carson City. This area is primarily responsible for auditing student enrollment counts on a quarterly basis which involves a combination of onsite visits and desk audits.

The organizational structure of the Office of District Support Services is shown in **Exhibit 5-13**.



Grants Management Unit (GMU)

FINDING

The GMU has well documented processes and procedures and is meeting monthly with LEAs and other subrecipients to improve communication.

GMU has developed internal procedures and training material for subrecipients that provide very detailed information on the process as well as the expectations relating to the activities within the GMU. A working copy of the GMU Process Manual which contained detailed instructions for each process, copies of forms and screens to be accessed during the process, and links to sites where content can be validated or associated rules can be viewed.

The working copy was clearly a work in progress, with additions, corrections, and deletions highlighted and tracked. According to the Administrative Services Officer III (ASO) for GMU, the unit regularly updates and enhances procedures based on rule and process changes as well as feedback from the subrecipients.

When the ASO came to the position, she found the operation in disarray and set out to document the processes. She also set up regular quarterly meetings with the subrecipients and asked them to provide feedback and their suggestions for improving the processes. GMU generally leads the discussions, but updates are regularly provided by the Office of Division Compliance.

Exhibit 5-14 is an excerpt from one of the earlier subrecipient meetings in April 2023.

EXHIBIT 5-14 PURPOSE OF QUARTERLY SUBRECIPIENT MEETING

Purpose of Quarterly Subrecipient Meetings

- The Student Investment Division (SID) hosts Quarterly Subrecipient Meetings with the goal of improving transparency, communication, and collaboration between NDE and our subrecipient partners
- SID staff provide updates on changes or developments that impact the subaward process within NDE as well as at the state and federal level
- We also solicit input from our subrecipient partners on opportunities for improvement that support efficiency and effectiveness
- The focus of these meetings is on global grants management, not on specific grants, many of which have their own dedicated meetings

Source: NDE Quarterly Subrecipient Meeting, April 2023.

As shown in **Exhibit 5-15**, requests and discussion items are captured and responded to so that participants know their concerns have been heard.

EXHIBIT 5-15
QUARTERLY SUBRECIPIENT CONCERNS

Revocation of 10% Rule

- Concern: LEAs need the flexibility to move funds between budget line items in order to cover small over budgets that can occur when costs come in slightly higher than budgeted.
 - Without this flexibility, LEAs cannot draw down all funds expended until a budget revision is processed to cover the over budget and certain purchases may have to be delayed.
- Request:
 - Allow LEAs to move budget within function and object code group without changing the intent of the budget item up to 10%

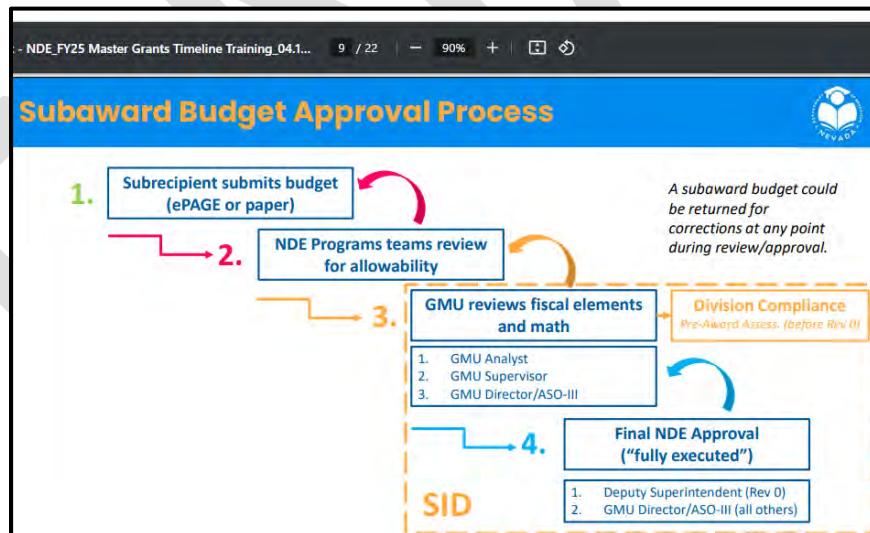
Focus Group responses:

- If we get 5% in ePAGE that would be a good start; 10% is still the requested goal
- The approval process for budget revisions is still long, especially for larger budgets; this can keep subrecipients from moving forward on purchases, shopping carts
- ePAGE used to allow an RFR to go over the total in the Object Code by up to a certain percent, which allowed us to draw down the funding without needing to do a full budget revision

Source: NDE Quarterly Subrecipient Meeting, April 2023.

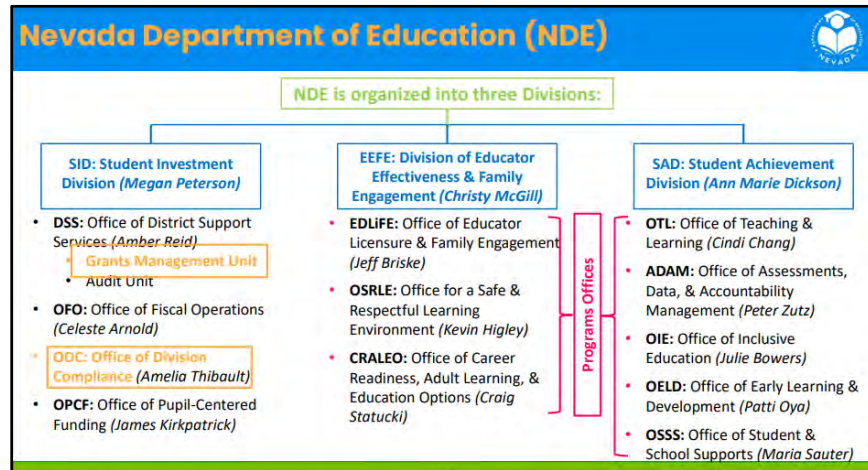
Training is also provided. Slides from the FY25 Master Grants Timeline & Processes training shows the process flow and the relationships between the program areas, Office of Division Compliance and GMU (Exhibits 5-16 and 5-17).

EXHIBIT 5-16
EXCERPTS FROM MASTER TIMELINE TRAINING



Source: NDE Staff Training on FY25 Master Grants Timeline & Processes, April 2024.

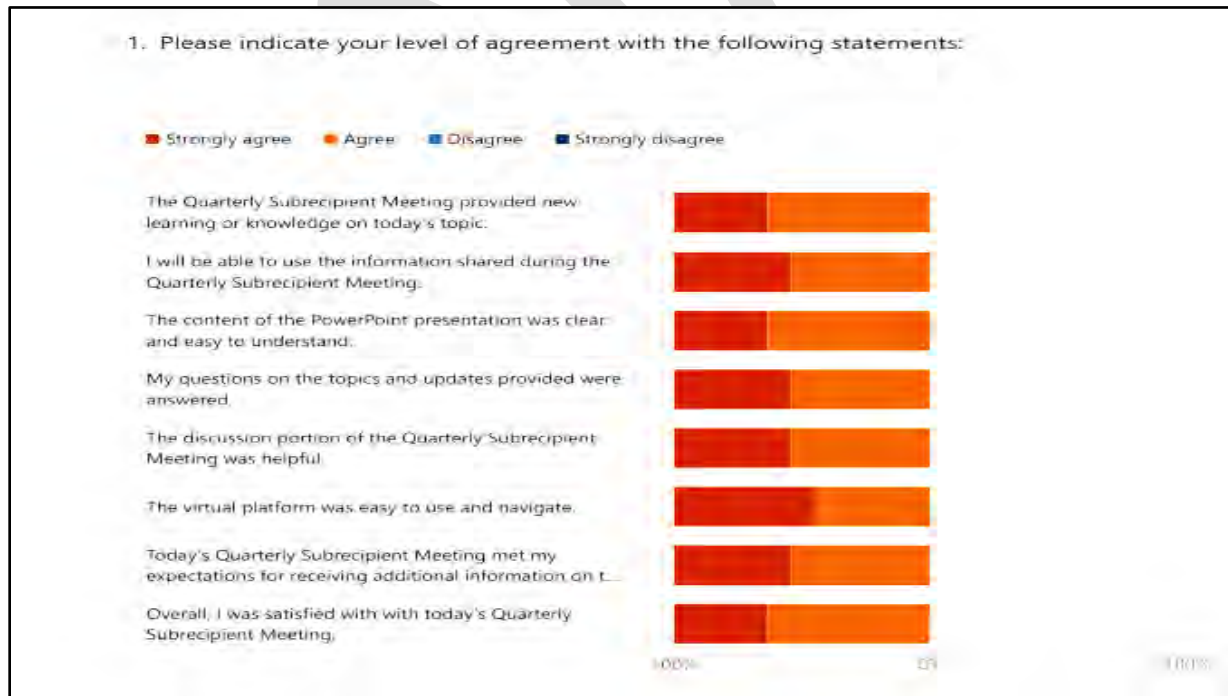
EXHIBIT 5-17
EXCERPTS FROM MASTER TIMELINE TRAINING



Source: NDE Staff Training on FY25 Master Grants Timeline & Processes, April 2024.

After each session, GMU asks participants to evaluate the session. As shown in **Exhibit 5-18**, recent feedback has been positive.

EXHIBIT 5-18
PARTICIPANT EVALUATIONS



Source: July 2024 Subrecipient Meeting Evaluation.

COMMENDATION 5-E:

GMU is commended for their efforts to provide subrecipients an opportunity for meaningful exchanges during quarterly meetings and for developing documented processes and procedures in collaboration with subrecipients.

Audit

The Audit unit is the only unit in SID that has employees physically located in NDE's Las Vegas Office. The primary work of the Audit unit is conducting Pupil Enrollment and Attendance Audits (PEAA). The purpose of the PEAA audit is to verify the number of pupils claimed for apportionment.

FINDING

The Audit Unit has developed procedures, checklists, and standardized letters and forms to be used in conducting their audits.

The Audit Unit provided the review team with copies of standardized letters and forms that are used to announce an audit, request data in support of the audit and provide feedback on the findings of each audit. An internal checklist guides the auditor through all aspects of the audit including travel arrangements and actual audit criteria. **Exhibit 5-19** provides key steps in the audit process.

EXHIBIT 5-19

**NDE 2025 PUPIL ENROLLMENT AND ATTENDANCE AUDIT PLAN
KEY COMPONENTS FY 2024-25**

NEVADA DEPARTMENT OF EDUCATION PUPIL ENROLLMENT AND ATTENDANCE AUDIT AUDIT PLAN SY2024-25	
I. AUDIT PLANNING AND PREPARATION	
1. Risk Assessment	
<i>Previous PEAA report(s)</i>	Obtain a copy of the previous PEAA Final Report for the 2023-24 PEAA file folder AIC to review previous Final PEAA Report; date and initial
<i>Audit Follow-Up</i>	Locate and open the audit follow-up form found at: G:\Auditors\PEAA (Pupil Enrollment and Attendance)\2024-2025\0-General Info & Master Forms SY24-25\Planning and Prep\Audit Follow-up Templates Save As (using the "naming conventions" rules) in the district/school folder, "Audit Planning" folder Review the single audit review from the previous fiscal year Complete the form by making notes from previous PEAA and single audit for follow-up of corrective action taken and status of implementation Print updated/completed form. File in PEAA folder, section 3.1 PY PEAA.
<i>Assess</i>	Y or N: Does district/charter have a current approved distance education program? Y or N: Does district have a current approved alternative education program? Y or N: Does district/charter have an approved school calendar or an approved alternative schedule?
4. Notifications / Correspondence	AIC: insert applicable information for notification letter into: G:\Auditors\PEAA (Pupil Enrollment and Attendance)\2024-2025\0-General Info & Master Forms SY23-24\Letters & attachments\Letter Notification-INFO; email Admin Assistant that schedule (if appl.) and INFO sheet are complete Note: if unique circumstances require the district/charter to have a custom-made notification letter/attachments: prepare accordingly using templates, save in district/charter Audit Planning folder, and submit to Admin Assistant, with explanation; Admin Assistant will then complete processing

Admin Assistant sends notification letter and attachments
 Send via email and US postal mail: Notification Letter, District & School Questionnaires (or Charter School Questionnaire), Required Items list, and Audit Schedule, as applicable
 Admin Assistant to copy AIC on email
 AIC should print notification letter and attachments to be placed in file folder Section 2.2-Notifications

5. District and Charter School File Folder Preparation

File Folder Prep

- Admin Assistant to copy and place the following items in charter/district file folder in tab "4-Prep Work"
 AIC to include Audit Plan-Fieldwork (District or Charter) (in tab 1.0-Admin)
- AIC to review the following items:
 - Approved calendar, year-round calendar, and/or alternative schedule/calendars/bell test
 - Approved professional days letter
 - Approved short days letter
 - Distance education program and approval letter
 - Alternative education program and approval letter
 - If available, AIC to put charter/district ADE submission to NDE from previous reporting period(s)

Source: Audit Unit, October 2024.

The documentation of preliminary audit findings and the final audit report provide the LEAs and charter schools ample time to respond and provide additional information to support any conflicts. The process for resolving disputes is also well-documented.

COMMENDATION 5-F:

The Audit Unit is commended for the organization, workflow, communication techniques, and standardized processes used in the conduct of their audits.

FINDING

Enrollment audits of Distance Education schools are challenging and require auditors to spend additional days/hours to gather the initial data required to perform the actual audit and potentially additional days onsite.

Distance education programs include a wide variety of course offerings which may be attended by full-time or part-time students. Auditors are required to review each student's attendance records for each course taken to determine student progress, the number of hours in attendance, and more.

The following excerpts from the Nevada Administrative Code illustrate the requirements and complexity of the audit work to be performed.

NAC 387.193 Pupil enrolled in program of distance education. (NRS 385.080, 387.123, 388.874)

1. A pupil who is enrolled in a program of distance education that has been approved pursuant to NAC 388.830 shall be deemed an enrolled pupil if:

(a) The school district or charter school has evidence, as documented in the electronic learning management system or the master register of enrollment and attendance required by NAC 387.171, of:

(1) The progress of the pupil toward completing the number of courses required for full-time pupils specified in the written plan for enrollment for the pupil developed pursuant to paragraph (b) of subsection 6;

(2) The enrollment of the pupil in the minimum daily period required pursuant to NAC 387.131; and

- (3) *The enrollment in a curriculum that is equivalent to the regular school curriculum; and*
- (b) *For each course of distance education in which the pupil is enrolled:*
 - (1) *The course is included on the list of approved courses of distance education prepared and published by the Department pursuant to [NRS 388.834](#); and*
 - (2) *The name of the pupil is included in the electronic learning management system or the master register of enrollment and attendance required by [NAC 387.171](#).*
- 2. *Each pupil enrolled in a course of distance education offered through a program of distance education must be recorded in full attendance for each week that the school district or charter school has evidence of the pupil's progression in each course as documented:*
 - (a) *In the electronic learning management system;*
 - (b) *By the pupil's participation in a real-time class session for the course which is conducted by a person who is licensed pursuant to [chapter 391](#) of NRS and who is authorized by the school district or charter school for the course; or*
 - (c) *By the pupil meeting or otherwise communicating with a person who is licensed pursuant to [chapter 391](#) of NRS and who is authorized by the school district or charter school for the course to discuss the pupil's progress.*

NAC 387.131 School day in session. ([NRS 385.080](#), [387.123](#))

- 1. *Except as otherwise provided in this section and except for an alternative schedule approved pursuant to [NAC 387.125](#), a school day in session must consist of the following minimum daily periods for each grade, including recess and time between activities, but not including the time allowed for lunch:*

Kindergarten	120 minutes
1 and 2	240 minutes
3 through 6	300 minutes
7 through 12	330 minutes

Auditors told the review team that some, but not all, schools maintain records electronically and are able to pull preliminary data into an Excel spreadsheet that significantly reduces the auditor's preparation time and time onsite. **Exhibit 5-20** shows the type of data that the auditors need to adequately prepare for the actual audit.

Of interest is the fact that schools are required to maintain this information. Therefore, collecting and submitting these data to NDE in a form and format that would significantly reduce the time required to conduct an audit of distance education programs would improve the department's efficiency.

NAC 387.171 Master register of enrollment and attendance: Required information; maintenance on computerized system. ([NRS 385.080](#), [387.123](#), [388.874](#)) *Each school or school district shall maintain a master register of enrollment and attendance containing the following information for each pupil:*

- 1. *The name of the pupil.*
- 2. *The date of birth of the pupil.*
- 3. *The school in which the pupil is enrolled.*
- 4. *The grade or ungraded category of educational service to which the pupil is admitted.*
- 5. *The dates, if applicable, of enrollment and reenrollment.*

6. *The date of withdrawal, if applicable, and the reason for the withdrawal, as described in [NAC 387.215](#).*

7. *The pupil's record of daily attendance.*

8. *The gender of the pupil.*

9. *The ethnic group or race to which the pupil belongs, according to the following designations:*

(a) American Indian/Alaskan Native;

(b) Asian or Pacific Islander;

(c) Black;

(d) Hispanic; or

(e) White.

Ê The master register of enrollment and attendance may be maintained on an electronic database or other computerized system if the school district obtains the approval of the Superintendent of Public Instruction.

EXHIBIT 5-20
SAMPLE DATA FOR DISTANCE EDUCATION AUDIT PREPARATION

Student Last Name	Student First Name	Grade Level	Course Name	Course Code	Section	Term	Course Enrollment Start Date	Course Enrollment End Date	Dropped or Active	First Activity	Last Activity	Weekly Attendance
pupil	A	9	Biology A	SCI120A		Semester 1	2023-10-09	2024-01-03	Inactive	2023-10-09	2023-12-13	UA
pupil	A	9	English 9 A	ENG100A		Semester 1	2023-10-09	2024-01-03	Inactive	2023-10-09	2023-12-13	UA
pupil	A	9	Financial Literacy	ELE500		Semester 1	2023-10-10	2024-01-03	Inactive	2023-10-09	2023-12-15	UA
pupil	A	9	Physical Education A	PE200A		Semester 1	2023-10-09	2024-01-03	Inactive	2023-10-09	2023-12-13	UA
pupil	A	9	Pre-Algebra A	MAT105A		Semester 1	2023-10-09	2024-01-03	Inactive	2023-10-09	2023-12-12	UA
pupil	A	9	Health	PE100		Semester 1	2023-10-09	2024-01-03	Inactive	2023-10-11	2023-12-15	UA
pupil	A	9	Biology B	SCI120B		Semester 2	2024-01-03	2024-05-23	Active	2024-01-03	2024-04-26	
pupil	A	9	Pre-Algebra B	MAT105B		Semester 2	2024-01-03	2024-05-23	Active	2024-01-03	2024-04-26	
pupil	A	9	English 9 B	ENG100B		Semester 2	2024-01-03	2024-05-23	Active	2024-01-04	2024-04-29	
pupil	A	9	Physical Education B	PE200B		Semester 2	2024-01-03	2024-05-23	Active	2024-01-04	2024-04-26	
pupil	A	9	Career Planning	ELE303		Semester 2	2024-01-03	2024-05-23	Active	2024-01-03	2024-04-29	
pupil	A	9	Computer Science and Applications	BT112		Semester 2	2024-01-03	2024-05-23	Active	2024-01-03	2024-04-25	

Source: NDE Student Investment Division, November 2024.

These data are not sufficient to confirm the validity of the distance education attendance and enrollment data, but it does provide the auditor with basic information from which a risk assessment and audit plan can be formulated. According to the auditors, much of the data gathering occurs onsite, with school personnel leading them through their data collection processes to manually gather all the data necessary to begin the actual audit. In some instances, this process can take three to four days, whereas an audit of a traditional school can normally be accomplished in one or two days.

While there are not standards for the length of time that should reasonably be spent on an audit of this type, limiting the time spent onsite by the auditor and the school personnel assigned to work with the auditor saves travel costs for the state and reduces disruptions to the school and reduces the time staff are taken from their primary jobs.

RECOMMENDATION 5-7:

Implement a process whereby schools offering distance education programs are asked/required to submit a spreadsheet containing the basic information needed to begin the audit process.

FISCAL IMPACT

Actual savings could not be estimated at this time; however, this recommendation should result in efficiency savings in terms of auditor time and could result in savings as auditors are able to reduce the number of days/hours necessary for onsite audits.

FINDING

Over time, the Audit Unit is almost exclusively dedicated to conducting legislatively required Pupil Enrollment and Attendance Audits which directly impact state funding and is, consequently, more closely aligned with the purpose and activities of the Pupil Centered Funding Unit.

The state of Nevada has in recent years sought to ensure adequate funding for schools. Senate Bill 543 (2019) created the 11-member Commission on School Funding to guide the work of the NDE to revamp Nevada's K-12 education funding formula for the first time in over a half-century. While the work of the Pupil Centered Funding Unit is outside of the scope of this study, it is important to note that the Pupil Attendance and Enrollment Audits mandated by the state are designed to validate the reported enrollment and attendance numbers to ensure the fair distribution of funds to the schools based on validated student enrollment and attendance numbers.

Pupil Centered Funding allocates funds to the schools based on reported enrollment. When the auditors find deficiencies or overages in the numbers reported by the schools, there is a reconciliation process at the end of the year when school must either pay back any money that was claimed erroneously or get paid for any additional amounts owed by the state when enrollment was understated. According to staff interviews, there is increasing legislative concern about the fair distribution of funds, which has led to a greater emphasis being placed on the audits.

A closer alignment of the funding distribution and audit functions could provide the additional emphasis being discussed by the Legislature and could result in modifications to the actual audit functions with respect to the areas of focus that most impact funding allocations.

The Audit Unit also conducts several less time-consuming yet required audits including the Title I Comparability Audits. Better alignment of those audit and compliance functions is also needed to ensure that

RECOMMENDATION 5-8:

Align the Audit Unit under the Pupil Centered Funding Unit.

Implementation may require coordination and approval from the Governor's Finance Office; however, the change in the reporting structure should have no impact on the location of the Audit staff. In making this move, careful attention should be given to maintaining an appropriate segregation of duties between the functions within the unit.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

OFFICE OF DIVISION COMPLIANCE

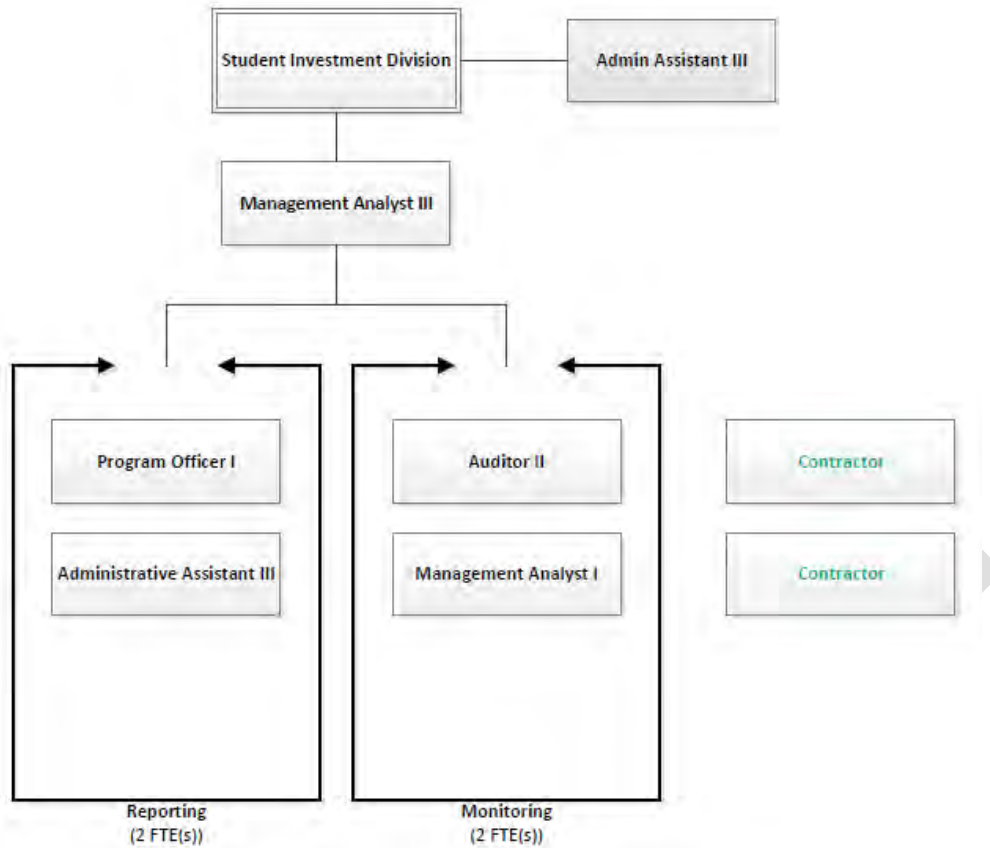
The Office of Division Compliance is divided into three domains: reporting, monitoring, and organizational management.

Monitoring Unit: The Monitoring Unit is responsible for pre-award assessments, subrecipient monitoring, grant audits, single audit review, external audit management, internal management of corrective action, internal audits, FFATA reporting, management of the master grant directory, state and federal intergovernmental and notification processes, reviewing grant applications and NOFOs, and ad hoc performance audits. The Monitoring Unit is responsible for all subrecipient monitoring, auditing school calendars to ensure compliance with state graduation and student attendance requirements, and follow-up on district single audit reports.

Reporting Unit: The Reporting Unit is responsible for school calendars, to include performance audits of calendars and instructional time, class size reduction, average daily enrollment, school facilities reporting, interlocal tuition agreements, ad hoc reporting, ad hoc performance audits, and pending implementation of additional efforts to include infinite campus compliance reviews, internal compliance monitoring, and risk assessments for pupil enrollment and attendance audits, among others. .

Organizational Management: Organizational Management includes the development and update of agency policies and procedures, internal controls, training, and design and implementation of workflow analysis and efficiencies. The organization chart for the Office of Division Compliance is provided in **Exhibit 5-21**.

EXHIBIT 5-21
OFFICE OF DIVISION COMPLIANCE ORGANIZATION



Source: Nevada Department of Education, Student Investment Division, February 2025.

FINDING

NDE's Office of Division Compliance is conducting extensive reviews of school calendars as required in the Nevada Administrative Code (NAC) 387.120 School calendar: Submission, contents.

The Office of Division Compliance is responsible for approving the initially adopted calendars and any modification made to the school calendars during the school year for such things as snow days, etc.

The unit determines whether the calendar contains the minimum number of days and hours for instruction including instructional bell times. This year, the unit is reviewing all high school calendars by calculating whether students are receiving the right amount of instructional time and credit hours. These reviews are being done in accordance with the Nevada Administrative Code as follows:

NAC 387.120 School calendar: Submission; contents. ([NRS 385.080](#), [387.123](#), [388.090](#), [388A.110](#), [388A.366](#))

- 1. Before May 1 of each year, each school district shall submit a copy of its school calendar for the approaching school year to the Department. If one calendar does not apply to all its schools, the district shall submit as many calendars as are necessary for application to all its schools. If a charter school submits a school calendar pursuant to this subsection, the charter school shall,*

upon the request of the sponsor of the charter school or a school district in which a pupil enrolled in the charter school resides, provide a copy of the school calendar to the requester.

2. Except as otherwise provided in subsection 5 and except for a school calendar that accompanies an alternative schedule approved pursuant to [NAC 387.125](#), a school calendar must contain at least 180 school days in session. This period must be divided into 10 school months which contain not more than 20 potential school days per month. The first day of the first school month is the first day of attendance by pupils.

3. In addition to the required number of school days in session, at least 3 days must be specifically designated by the school district as contingent days to be used as school days in session if:

(a) At least 75 percent of the schools in the district are rendered inaccessible or unusable by inclement weather, uncontrollable circumstances or an accident; or

(b) The Governor declares a legal holiday not anticipated in the original school calendar.

Ê If a substantial majority of the schools within a school district are closed because of any of these conditions, all of the contingent days must be used before the school district applies for an emergency closing.

4. Any day for an organized teachers' conference for professional development convened by the board of trustees of a school district or a school may be included in the number of school days in session required in subsection 2 with the prior approval of the Superintendent of Public Instruction. A day for an organized teachers' conference may also be declared by the Superintendent of Public Instruction. Not more than 5 days for teachers' conferences, or an equivalent number of minutes if teachers' conferences are held only for a portion of a day, may be convened by a school or school district in any school year.

5. A school calendar for an adult high school program, an alternative program, a program of distance education or a program of instruction in a detention home must contain at least 180 school days in session unless the school district or governing body of the charter school, as applicable, obtains the written approval of the Superintendent of Public Instruction for a program that demonstrates progress or completion by pupils in a curriculum which is equivalent to the regular school curriculum. The approval of an adult high school program pursuant to [NAC 387.190](#), an alternative program pursuant to [NRS 388.537](#) or a program of distance education pursuant to [NAC 388.830](#) shall be deemed written approval by the Superintendent pursuant to this subsection if the approved program demonstrates progress or completion by pupils in a curriculum that is equivalent to the regular school curriculum. For purposes of this subsection, demonstrated competency in curriculum that meets the state standards may be considered equivalent to the regular school curriculum.

As part of the calendar reviews, the Office of Division Compliance is also examining the time required for a unit of credit required in NAC 389 - Academics and Textbooks. As a result of these reviews, the unit has identified several instances where schools and districts were not providing the minimum time required for a unit of credit or the minimum number of days. Corrective action plans are required and are resulting in changes that are directly impacting student instruction time.

COMMENDATION 5-G:

The Office of Division Compliance is commended for following the Nevada Administrative Code by conducting reviews of school calendars.

FINDING

The Office of Division Compliance within SID has compiled an Internal Control Manual (ICM) relating to the Division and some agency internal controls.

The first chapter of the ICM explains the elements that make up an internal control system, requirements for internal controls under the Green Book (Federal Standards for Internal Control), and how NDE's controls have been categorized. Understanding the elements of an internal control system and how NDE's controls conform ultimately supports the control environment and elevates the importance of adherence to internal controls.

Where the office has identified weak or ineffective internal controls, processes and procedures are developed to strengthen those controls.

As shown in **Exhibit 5-22**, the ICM is organized in terms of activities:

- **Agency Activities**, which apply to all employees across all tasks, regardless of their nature.
- **Programmatic Activities**, which apply to all employees interacting with external-facing activities (i.e., activities that engage with districts, educators, etc.).
- **Financial Activities**, which apply to technical financial activities conducted by specialists to maintain internal operations; and
- **Data and IT Activities**, which apply to technical data and IT activities conducted by specialists to maintain internal operations.

EXHIBIT 5-22
NDE INTERNAL CONTROL MANUAL
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Source: SID Compliance Office, December 2024.

Under each of the control functions (pages 17 through 94), the manual contains the following sections that describe the process and control activities associated with each function:

- Objectives (identified objectives of the function or operational area)
- Performance Measures (specific and measurable terms to allow for the assessment of performance and achievement in quantitative or qualitative terms)
- Risk Tolerance (the acceptable level of variation in performance relative to the achievement of objectives)
- Supporting Documentation (the associated rules, manuals, guidelines, or laws)

- Identified PCNs (Position Control Numbers for employee positions effected by this control)
- Segregations of Duties Matrix (duties and levels of authority/approval)
- Control Activities (listed by control and sub-control with the PCNs of positions responsible for implementation)

The ICM contains comprehensive information relating to the desired internal control structure and environment for each of the identified components.

COMMENDATION 5-H:

NDE is commended for developing a comprehensive Internal Control Manual that provides information on the desired control structure and the rationale for that structure and assigns responsibility for the maintenance of that structure to specific positions within the agency.

FINDING

Although the ICM provides the desired internal control structure and the Office of Division Compliance has not had the capacity to implement an agency-wide internal audit charged with monitoring compliance with agency-specific internal controls.

Responsibility for Internal and Compliance Audits within Nevada State Government is assigned to the Internal Audit section within the Governor's Finance Office (GFO). According to the GFO website, the Internal Audits section conducts Governor-directed audits that result in recommendations for agencies to improve the efficiency and effectiveness of operations. Audit reports are presented to the Executive Branch Audit Committee (comprised of the Governor, Lieutenant Governor, Secretary of State, Treasurer, Controller, Attorney General, and an appointed public member) at a public meeting. Agencies are required to attend the meeting and address any questions from committee members.

The Compliance Review section performs reviews that provide recommendations for agencies to improve the effectiveness of internal controls and compliance with state and federal guidelines. Review recommendations are intended to help agencies safeguard valuable state and federal resources and ensure compliance with state administrative guidelines, regulations, and statutes. Recommendations also help agencies receiving federal funds comply with applicable federal guidelines. Review reports are issued to agency management and the Clerk of the Board of Examiners.

A review of the office's annual reports and the individual agency reports found that an agency wide internal audit and compliance report of the NDE was issued in 2018, and two targeted audits were released in February 2024 by request and executive order:

- DIA 24-02) State Public Charter School Authority (request).
- (DIA EO 2023-005) Review of Nevada's 17 Public School Districts and the State Public Charter School Authority (executive order).

The 2018 audit provided recommendations for operational improvements within the agency; however, the reports issued six years later contained only limited assessments of the agency's internal controls.

This type of third-party auditing of internal controls provides valuable insights; however, ensuring internal compliance with the operational controls is not the primary focus of these GFO audits and is too infrequent to ensure that that day-to-day operations of the agency remain in compliance.

According to the ICM, the Office of Division Compliance is responsible for oversight of the Internal Control system and providing input for the remediation of deficiencies:

Oversight for the Internal Control System

The Office of Division Compliance is responsible for the development, maintenance, and monitoring of the internal controls system, to include the:

- *Internal Controls Manual*
- *Biennial Report on Internal Controls*
- *Internal Risk Assessments*
- *Biannual Internal Control Monitoring*
- *Corrective Actions, Improvement Plans, Change Analyses, and Internal Control Systems Plans*

While Division Compliance has oversight responsibility, management of a successful internal controls system relies on collaboration and proactive accountability practices across the Department.

Input for Remediation of Deficiencies

Division Compliance is responsible for issuing corrective action plans responsive to findings during internal risk assessment, monitoring, or otherwise identified by the internal controls system, and subsequent follow-up on the progress of corrective action and remediation. Following any findings, Division Compliance will collaborate with the applicable office and/or unit regarding the issuance of the corrective action plan (CAP) and next step

While these are amiable goals, the Office of Division Compliance does not have the staffing to implement this plan. As shown in the organization chart (**Exhibit 5-21**), there is a Management Analyst III that leads the office and two positions dedicated to monitoring activities. These positions are fully engaged in monitoring the use of grant funds, LEA calendars, and a host of other key activities. Consequently, compliance with the ICM is, at this time, voluntary.

Implementing an internal audit function for governmental entities with an annual budget in excess of \$75 million is considered a best practice.⁸² NDE, with an annual budget in excess of \$8 billion, certainly falls within that category. The Government Finance Officers Association (GFOA) recommends that every governmental entity should consider an internal audit function to help management maintain a comprehensive framework of internal controls.

In addition to ensuring compliance, the benefits of an agency-based internal audit function include improving accountability, transparency, integrity, and fairness. According to industry experts, this type of auditing can result in:

- Improved program and services;
- Cost savings;
- Increased revenue;
- Improved accountability for performance;
- Improved awareness of risks; and
- Prevention of future problems.

⁸² The Mercadian Group <https://www.mercadien.com/resource/should-government-organizations-consider-internal-audit-functions/>.

RECOMMENDATION 5-9:

Create an Internal Audit section within SID that is charged with monitoring internal controls agencywide.

While this section would administratively report to SID, final reports should be presented directly to the Superintendent and Cabinet for discussion and corrective actions.

This section should be staffed by a minimum of three positions, a Senior Auditor to lead the section and two additional auditors. NDE should work through the GFO and Legislature to request these positions or to obtain approval for contracted positions to fill the roles.

Once positions are in place, an audit charter or the equivalent should be documented to define the role and responsibility of this section and the reporting relationships. An annual audit plan should be developed in compliance with Internal Audit standards. As noted above, documented audit result reports should be provided to the Superintendent, SID Deputy, and the division heads and directors responsible for the areas under review. A formal process should be established for audit responses and the remediation of deficiencies.

FISCAL IMPACT

The average salary for an Auditor Manager is currently \$75,540 and the average salary for Auditor II positions is \$61,404. Assuming benefits of approximately 50 percent, the annual cost for creating this department would be as follows:

Classification	Number of Positions	Annual Salary	Benefits @ 50% of Salary	Total Cost
Audit Manager	1	\$75,540	\$37,770	\$226,620
Auditor 2	2	\$61,404	\$30,702	\$184,213
Annual Total				\$410,833

Recommendation	2025-26	2026-27	2027-28	2028-29	2029-30
Create an Internal Audit section within SID	(\$410,833)	(\$410,833)	(\$410,833)	(\$410,833)	(\$410,833)

SECTION 6.0: OFFICE OF INFORMATION TECHNOLOGY (OIT)

OVERVIEW & CURRENT ORGANIZATIONAL STRUCTURE OF OIT

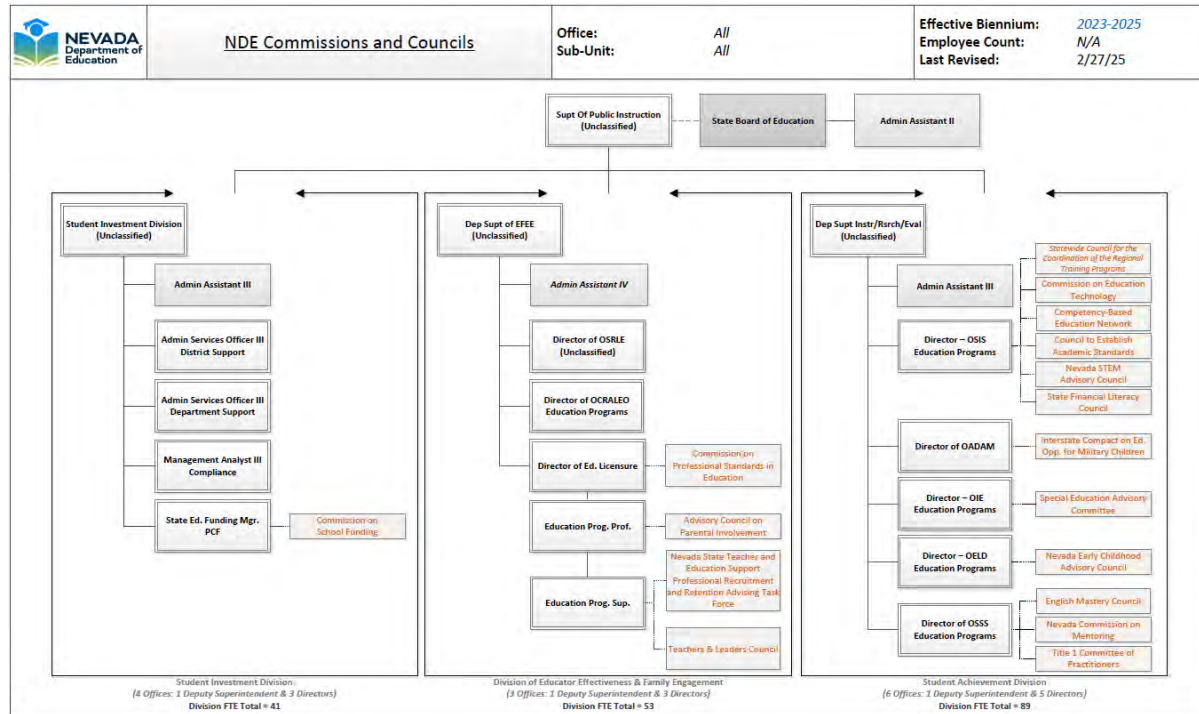
The Office of Information Technology (OIT) of the Nevada Department of Education (NDE, “Department”) is part of the Student Achievement Division under the leadership of a Deputy Superintendent, as shown in **Exhibit 6-1**. **Exhibit 6-1** provides a high-level perspective of the three branches of executive leadership reporting directly to the Superintendent. OIT reports directly to the Office of Assessment, Data, and Accountability Management (ADAM, Accountability Office) under the leadership of an Administrator.

ADAM collects, manages and produces data to evaluate the effectiveness of schools, districts and relevant programs. In addition, it assures the validity, reliability, and transparency of all processes related to statewide assessments and the system of accountability.

The mission of the Accountability Office is to serve the public by providing accurate, useful, honest, and on-time education data. A valid and reliable accountability system is the foundation for all school- and district-related data reporting and generates all data reports required by state and federal law. As a repository for meaningful and actionable data, the accountability system supports analyses to identify whether schools and districts are improving and preparing students for success in college and career. The system tracks student learning progress, is essential to monitoring school quality, informs instructional practices, and is helpful to parents in informing school selection. In alignment with both federal and state education laws, the Nevada State Assessment System ensures all public-school students, no matter where they attend public school, receive a quality education. Challenging academic standards and assessments were adopted by the Board of Education and Nevada State Legislature to effectively prepare and assess students’ readiness for success in a global 21st century.

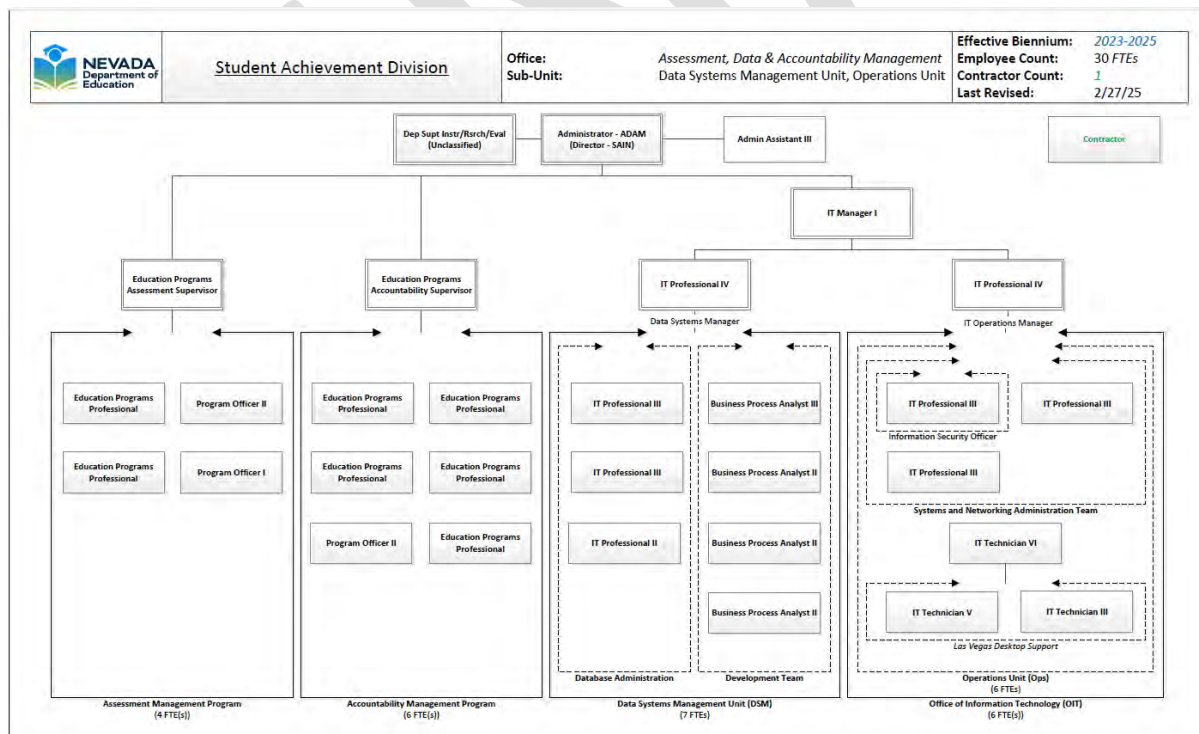
Exhibit 6-2 provides a more detailed view into the organizational structure of NDE’s Office of Information Technology, which services as the technology hub for systems and services for all NDE offices. The IT Manager I over OIT leads two distinct areas: 1) The Data Systems Management (DSM) unit with eight full-time equivalent (FTE) positions, and 2) the Operations (Ops) unit with seven FTEs. Together, these two units provide all IT operations, systems administration, and data systems support for NDE. NDE OIT can be viewed as a local technical support team that works in tandem with the broader state of Nevada IT offices under the Office of the Chief Information Officer (OCIO), which also provide IT services and support to NDE for various systems and technologies.

EXHIBIT 6-1
DIVISIONS, OFFICES, AND PROGRAMS OF NDE



Source: Nevada Department of Education, February 2025.

EXHIBIT 6-2
OFFICE OF INFORMATION TECHNOLOGY (OIT) ORGANIZATIONAL STRUCTURE

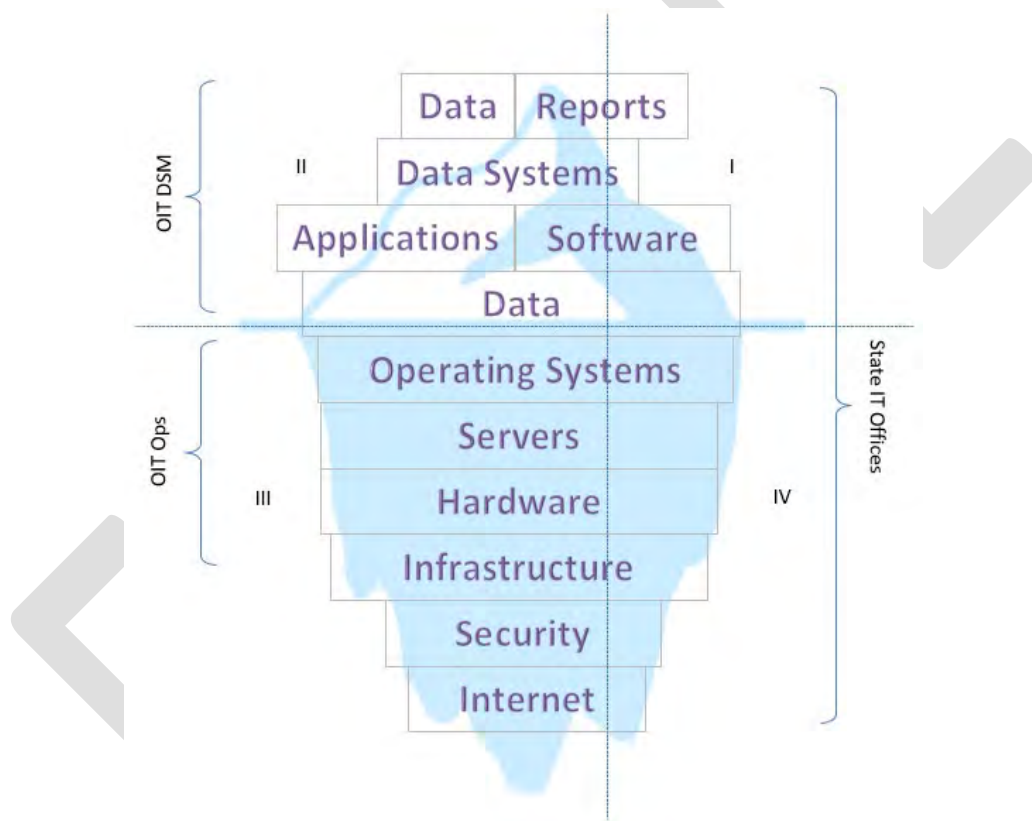


Source: Nevada Department of Education, February 2025.

Exhibit 6-3 depicts a general division of IT responsibilities among the OIT and state IT offices. For the purposes of this study, IT is a broad term applied to the full continuum of technology services ranging from data and reports at the top layer of the iceberg metaphor to network infrastructure, security, and the internet as the supporting lower layers. The image is divided into four quadrants, with quadrants I and IV (the right side) representing IT systems and technologies supported by state IT offices, and quadrants II and III (the left side) representing IT systems and technologies supported by OIT.

The water line is used to show the general separation of responsibilities as currently assigned to the two NDE OIT units with DSM in quadrant II, and Ops in quadrant III. While NDE IT provides many local services to its department, it can be viewed as subordinate to the broader state IT offices for its dependency on security, the internet, and some infrastructure and enterprise software support.

EXHIBIT 6-3
DIVISION OF IT RESPONSIBILITIES AMONG NDE OIT AND THE STATE IT OFFICES



Source: Adapted by the Public Works LLC Team from a similar illustration from the 2022 Asset Map & Organization Alignment study.

Exhibit 6-4 further details the general division of responsibilities of **Exhibit 6-3** between OIT and state IT offices. The individual or shared responsibilities for each quadrant are indicated by an “X” in the respective office columns. Quadrant boundaries are identified with blue borders, and quantities of pertinent systems or technologies were taken from the most current versions of the digital asset maps maintained by OIT. An “X” in only the OIT column indicates that OIT is solely responsible to support the technology in the respective row. An “X” in only the State column indicates that the state is solely responsible to the technology. The presence of an “X” in both columns indicates the responsibility is shared among OIT and the state. Some explanations have been provided as footnotes where needed.

Several definitions are provided as follows to give context and clarity to the information in the Layer column and as presented throughout this report. It is important to note that all the definitions apply to either OIT or state IT supported systems and technologies:

Data system. A data system is defined as an enterprise or non-enterprise system used by NDE to conduct the core business of receiving, storing, distributing, or reporting data. If a data system is also an application, it is included in the asset map as a data system and referenced in the Applications asset map.

Application. An application is defined as a custom programmed enterprise or non-enterprise system developed by NDE technical staff and not identified in Services. Standard productivity documents such as Word, Excel, PowerPoint, or Access are included only if customized with a scripting or programming language. Excel workbooks using standard calculation functions are excluded unless developed with embedded Visual Basic for Applications (VBA) code, and databases developed using standard forms, queries, and reporting are excluded unless developed with embedded VBA code.

Software. Software is defined as ‘other enterprise’ or ‘non-enterprise’ software, or volume licensing, owned by NDE and not identified in Services. Examples of these might include Microsoft Teams, Microsoft 365, or Adobe Acrobat Professional. Some software is better identified as a service such as McAfee for desktops.

Enterprise vs. Non-Enterprise Systems. By definition for this study, an enterprise system is a large-scale system that supports business processes, information flows, reporting, and data analytics, and is widely accessed by employees or users within or outside of the agency or organization. Non-enterprise systems are any that fall outside of this definition, and the key differentiator is widely accessed.

EXHIBIT 6-4
DIVISION OF RESPONSIBILITIES AMONG NDE OIT AND STATE IT OFFICES

Layer	System or Technology	Name/Provider	OIT	State ⁸³
Reports	72 NDE specific reports		X	
Data Systems	36 NDE specific ⁸⁴ : 27 enterprise, 24 student-related, 1 OIT supported		X	
Data Systems	Hosting	Azure	X ⁸⁵	
Applications	10 NDE specific: 10 enterprise, 3 student-related, 5 OIT supported		X	
Applications	IAM/IDM		X ⁸⁶	X
Applications	Web services / dev			X

⁸³ State IT services are provided through the *Enterprise IT Systems* (EITS) office unless otherwise indicated.

⁸⁴ Includes the SAIN data lake, which serves as a staging area for raw data; the NPWR reporting system which gets the majority of its data from SAIN; and the iMart in-house developed data warehouse, which is slated for replacement by a cloud-based system based on the Common Education Data Standards (CEDs).

⁸⁵ State does not have an offering to provide data hosting.

⁸⁶ NDE considering moving to the State provided MS Azure identity and access management platform.

Layer	System or Technology	Name/Provider	OIT	State ⁸³
Software	41 NDE specific ⁸⁷ : 22 enterprise, 0 student-related, 28 OIT supported		X	
Software	Finance	Advantage ⁸⁸		X
Software	HR/Payroll (timesheets)	NEATS ⁸⁹		X
Software	HR recruitment	NVApps ⁹⁰		X
Software	HR training	NVeLearn ⁹¹		X
Software	Procurement	E-Pro		X
Software	Productivity / Email	Microsoft 365 ⁹²		X
Software	Telecom	Avaya ⁹³		X
Data		MSSQL	X	
Operating Systems (OS)	Windows 10-12		X	
Operating Systems	MacOS		X	
Operating Systems	Android, iOS		X	
Operating Systems	Active Directory (AD)			X ⁹⁴
Servers	Application/Data		X	X ⁹⁵
Hardware	Endpoint devices ⁹⁶		X	
Infrastructure	WiFi		X ⁹⁷	
Infrastructure	Internet			X
Infrastructure	Local Area Network (LAN)		X	X ⁹⁸
Infrastructure	Wide Area Network (WAN)	Silvernet ⁹⁹		X
Security	Badge entry	Ccure		X ¹⁰⁰
Security	Endpoint protection	Semantic ¹⁰¹		X
Security	Endpoint threat scanning	Nessus ¹⁰²		X
Security	Web filtering (basic)			X
Security	Firewall ¹⁰³			X

⁸⁷ Included is the FreshDesk help desk software used by OIT for trouble ticket management and end user support.

⁸⁸ This system was slated for replacement December 2023.

⁸⁹ <http://neats.state.nv.us>. NEATS is the Nevada Employee Action and Timekeeping System for payroll.

⁹⁰ <https://nvapps.state.nv.us>

⁹¹ NVeLearn for pre-recorded and live training through NEATS scheduling. Both systems are slated for replacement by NV Core within a few years.

⁹² State edition and service management distributed to the agencies including NDE.

⁹³ Planned to convert to Teams calling next fiscal year and will have a new offering.

⁹⁴ For NDE users; SAINZ users have their own separate domain.

⁹⁵ OCIO facility provides hosting services including rack space, back-up power, and network connectivity.

⁹⁶ 407 devices including 250 desktop and laptop computers; 87 physical, virtual (VM), and storage area network (SAN) servers; 15 printers; 28 LAN/WiFi switches and routers; and 27 videoconferencing units.

⁹⁷ Guest WiFi provider paid by NDE, requires separate dedicated access points also paid by NDE.

utilizes dedicated access points (separate dedicated LAN)

⁹⁸ Cabling handled through State contractors and State Telecom but paid by NDE.

⁹⁹ NDE pays the State for LAN/WAN/WiFi services by bandwidth consumption through a distributed cost allocation model. The LAN/WAN is used to carry NDE's internet and State network traffic.

¹⁰⁰ Not yet deployed at NDE, estimated deployment next fiscal year.

¹⁰¹ Semantic endpoint protection will be changed out this fiscal year.

¹⁰² Provided through the State's Office of Information Security (OIS).

¹⁰³ External firewall access logs are scanned by AI for malicious patterns to be blocked from the firewalls coming into the network.

Layer	System or Technology	Name/Provider	OIT	State ⁸³
Security	Cybersecurity			X
Internet	Internet ¹⁰⁴	Switch		X

Source: Created by the Public Works LLC Team through interviews and provided documentation.

With the exception of the lower Security and Internet layers, OIT has responsibility for supporting components of the other higher layers from infrastructure to data and reporting. This is an important observation when considering the size of the office in relationship to the scope of its responsibilities. 31 of the 46 data systems and applications in use by NDE are student-related (67%), which underscores the critical importance of student data as the core business driver for NDE. Infinite Campus (IC) is the statewide student information system and is used by Nevada's 17 county districts and State Public Charter School Authority (SPCSA) to generate the bulk of NDE's data. Under ADAM, OIT chairs the Infinite Campus Governance Board (ICGB) which provides governance and makes policy recommendations for system configuration and data. Two representatives from each district and the SPCSA serve on the committee which has been meeting monthly since the inception of the state edition of IC in 2017.

OIT is budgeted annually for full-time equivalent (FTE) positions, but it does not develop a budget of its own. Costs for NDE related technology initiatives and projects are covered by the various office budgets which are approved biannually with each legislative session. Similarly, the relationship between OIT and the State IT offices is one of a cost allocation model, meaning that services provided by the state to NDE are funded through each of NDE's budgeted offices - OIT does not develop and maintain a budget for those services. Furthermore, while the WAN is managed by the state, LAN and WiFi are managed by OIT except for the cabling infrastructure which is managed by the state but funded by NDE budgets. This should be expected to ensure the cable plant and performance metrics (KPI's) adhere to a defined set of standards.

Exhibit 6-5 shows how OIT responsibilities are mapped among the 16 positions in the office, with one IT manager, two supervisors, and 13 staff. For the three members of the database administration (DBA) team, these generally include application development and support, system administration and support, enterprise data management, database administration, and system documentation. The four members of the development team are primarily responsible for business analytics and application development and support, which also includes building interfaces among systems and documentation. The two members of the systems administration team are mainly responsible for systems and server administration and operations, information security, application and information security administration, LAN/WiFi administration and support, help desk and end-user support, and documentation. The desktop support team is comprised of three positions, two which support the Las Vegas NDE office and one which supports the Carson City office. Their primary areas of responsibility include help desk, desktop, and videoconferencing support. There is one Information Security Officer (ISO).

There is some overlap of responsibilities among positions in OIT, and some positions support technologies outside of their job descriptions. Some OIT positions provide limited support for state IT managed technologies including endpoint security, firewall, identity and access management (IAM/IDM), internet, Microsoft 365 applications, and some web services excluding website development – which is provided by state IT or outsourced.

¹⁰⁴ Two balanced 10 GB Zayo fiber connections direct from the State facility to Switch Communications.

FINAL REPORT

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The IT portion of this study builds upon and extends the work of the 2022 Asset Map & Organizational Alignment Study which focused on IT organizational alignment, digital asset governance and management, and business processes defining their initiation, acquisition, and decommissioning. Details of that project focused on the following areas, which will be reviewed with the current status of 41 related recommendations that followed: Budgeting; digital asset map and database; digital asset business process maps: digital asset initiation, acquisition, decommission; Governance, project management, project queue; IT organization alignment; data systems; systems infrastructure and integration (NDE supported vs. State EITS); inventory; help desk, and technical support.

In addition, the current study will extend the work of the 2022 project by addressing efficiencies and effectiveness attributes of topics not covered previously including: business continuity (Continuity of Operations – COOP); disaster recovery; policies & procedures; data management; technology planning; documentation, and NDE staff perceptions.

BUDGET

The Office of Information Technology is funded through the following three general fund NDE budgets:

- **2673: NDE – Office of the Superintendent.** The Office of the Superintendent is responsible for the administration of the provisions of law relating to the jurisdiction, duties, and functions of the Department of Education and leads the system of PreK-12 public education in the state. This includes collaborating with the Nevada State Board of Education to lead the development, implementation, and monitoring of the Statewide Plan for Improvement of Pupils, as well as prepare an annual report of the state of public education in Nevada. NRS 385; NRS 385.010; NRS 385.175; NRS 385.230
- **2716: NDE – Data Systems Management.** This budget includes funding for staff, vendor services, data system operations, all related system hardware and software, and general administrative expenses. Statutory authority: NRS 386.650
- **2720: NDE – Department Support Services.** This budget account funds staff and operating expenditures to oversee the development and monitoring of budget accounts that support the department and its programs. In addition, all finance-related duties, including personnel and payroll functions, are supported through this budget account. Staff and operating expenditures for the provision of information technology services to department staff are maintained through this account.

The five-year plan for these budgets is shown in **Exhibit 6-6**. About \$17,000 additional funds are budgeted from the Office of the Superintendent 2673 for Information Services but are not included in the annual totals for each team.

EXHIBIT 6.6
FIVE-YEAR BUDGETS FOR THE OIT DSM AND OPS TEAMS

Code	Budget Account	Tot FY 2021	Tot FY 2022	Tot FY 2023	Tot FY 2024	Tot FY 2025	Total
2673	NDE - Office of the Superintendent	\$18,072,375	\$15,085,121	\$6,601,661	\$4,465,301	\$4,456,290	\$48,680,748
2716	NDE - Data Systems Management	\$6,751,420	\$7,230,016	\$4,967,466	\$5,427,193	\$6,275,061	\$30,651,156
2720	NDE - Department Support Services	\$5,462,962	\$3,888,780	\$4,139,625	\$5,331,180	\$5,405,377	\$24,227,924
Annual Total of 2716 and 2720		\$12,214,382	\$11,118,796	\$9,107,091	\$10,758,373	\$11,680,438	\$54,879,080

Source: 23-25 Biennium Budget, Governor's Finance Office, as of February 5, 2025.

ORGANIZATION

FINDING

The ADAM Office of Information Technology is two levels removed from the Office of the Superintendent under the Student Achievement Division, even though it is responsible for the major data and technology systems that serve the business needs of all NDE Divisions and Offices.

OIT's current placement within the organization has created an environment where the ADAM manager must inform or obtain clearance from the Division leader for newly requested projects or initiatives from another Division. This multi-reporting relationship makes it difficult for the manager to be as responsive

or proactive as possible in a structure that enables the manager to function with more autonomy in prioritizing and serving the needs of the agency with fairness. OIT's position in the organization as a subordinate to ADAM minimizes its importance, and is thereby perceived, budgeted, and treated as such. This is a common problem in organizations that are reliant on IT services but relegate them to an *operational* rather than a *strategic* function to avoid having to engage the complexities of their issues. Nine of ten peer State Education Agencies are structured with IT services reporting under operations or finance, whereas only one structured them to report directly to their State Superintendent. Public Works views this as an opportunity for NDE to lead with a more strategic approach to IT's role within the organization.

RECOMMENDATION 6-1:

Assign a Chief Information Systems Officer (CISO) reporting directly to the State Superintendent of Public Instruction to oversee the IT function of NDE.

A detailed justification for this recommendation was made in Section 1.0: *Overall Reorganization Recommendation for the Three Divisions Under Study, Rationale for Moving IT Manager & Tech Operations to Chief Information Systems Officer (CISO)*.

Furthermore, several significantly impactful recommendations will be made in this chapter, one of which ties directly to a major decision made by NDE to overhaul and replace the existing data infrastructure with one that is highly consolidated and automated. The recommendations include a statewide data management system, an enterprise data management framework, the update or development of technology action plans to build a strong support structure agency wide, a proposed return on investment (ROI) engine finely tuned with documentation standards that extend throughout all Divisions and systems, and improvements to statewide student information system processes and vendor support to be more responsive to the needs of LEAs and NDE.

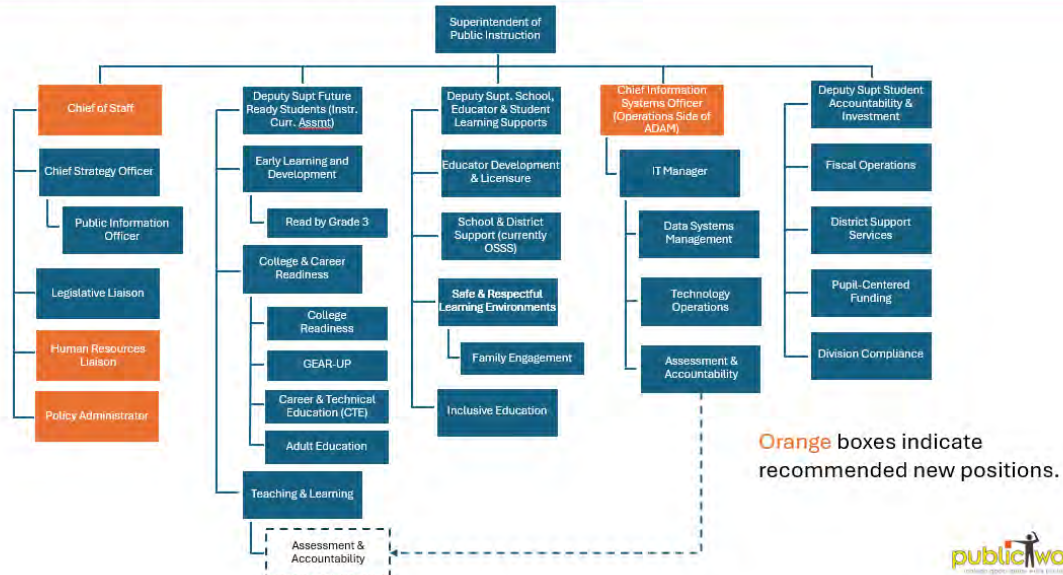
OIT currently resides within the ADAM office in the Student Achievement Division. Placement of a Chief Information Systems Officer (CISO) reporting to the Superintendent will ensure that strategic and operational initiatives with IT investments will receive the highest level of attention throughout the agency, and with equal importance and priority assigned to each Division. It guarantees that their efforts serve the needs of and are represented by members of all Divisions.

IT Data Systems Management and Technology Operations would remain permanently under the CISO and IT Manager. Although instructional leaders involved with this study agree that Assessment and Accountability are better positioned functionally under the instructional side of NDE, technically they should temporarily remain under the CISO as they are data and compliance heavy and require significant support from the DSM team to sustain. A heavy reliance on the CISO team will be needed for staff on the instructional side to assume those responsibilities.

The transitional positioning of Assessment & Accountability is shown in **Exhibit 6-7** by a solid box under the CISO, which represents the current assignment of that function. A dashed line pointing to a dashed box under Teaching & Learning represents the future assignment of that function when the transition is complete.

EXHIBIT 6-7
PROPOSED ORGANIZATIONAL CHANGES

Proposed Organizational Changes



Source: Created by the Public Works LLC Team, 2024.

FISCAL IMPACT

The CISO position is placed at the same level as the Deputy Superintendents to ensure that equal importance and priority is assigned to each Division, and that all technology initiatives and related efforts serve the needs of and are represented by members of all Divisions. The cost of the CISO position is included in **Section 1.0 Recommendations 1-5 and 1-6** Fiscal impact.

Recent Progress – 2022 IT Asset Map & Organizational Alignment Study

Since the release of the 2022 IT study, NDE has made significant progress in addressing the 41 recommendations designed to improve operational efficiency at that time. **Exhibit 6-8** summarizes the distribution of recommendations among general areas covered by the study, followed by progress with those recommendations as reported by the OIT team during the course of this study in **Exhibit 6-9**.

EXHIBIT 6-8
2022 IT REPORT RECOMMENDATION AREAS

Study Area	# of Recommendations	% of Total Recommendations
Asset management	8	19.5%
Budget	2	4.9%
Change management	1	2.4%
Data systems	4	9.8%
Business process	13	31.7%
Governance	1	2.4%
Help Desk Technical support	1	2.4%

Study Area	# of Recommendations	% of Total Recommendations
Organization alignment	8	19.5%
Project management	2	4.9%
Work shift	1	2.4%
TOTAL:	41	100.00%

Source: Created by the Public Works LLC Team, 2024.

EXHIBIT 6-9 2022 IT REPORT RECOMMENDATIONS STATUS

COMPLETED	15	36.6%
PARTIAL	10	24.4%
IN-PROGRESS	5	12.2%
		73.2%
NOT STARTED	5	12.2%
ON HOLD	2	4.9%
FUTURE	2	4.9%
		22.0%
NOT IMPLEMENTED	2	4.9%
TOTAL:	41	100.00%

Source: Created by the Public Works LLC Team, 2024.

Progress as reported in **Exhibits 6-8** and **6-9** is highly commendable with 73.2 percent of the recommendations identified as either COMPLETED, PARTIAL, or IN-PROGRESS – with PARTIAL defined as implemented in a different manner from the recommended approach. In most PARTIAL cases, the difference is found in the use of Smartsheets for communication and approval of asset initiations and acquisitions in lieu of an internal governance board with regularly scheduled review meetings. With constraints on executive leadership availability, the realized solution provides near real-time review and approval, eliminates time delays, and preserves valuable time. The five recommendations labeled as NOT STARTED are directly related to staff and budget resource limitations but are still regarded as relevant and important. Three of the four recommendations labeled ON HOLD and FUTURE are related to Asset Map v3.0, an asset management function which cannot be fulfilled until the current Asset Map v1.0 (NOT STARTED) is brought up to date and extended to include fiscal attributes related to budget and contract information. The two recommendations labeled NOT IMPLEMENTED are no longer applicable as they require a different asset governance structure and process which was replaced by the alternative Smartsheet solution. During the interview phase of this project, NDE leaders have commented on the progress they have made in implementing recommendations during the last two years, affirming status as reported by IT independent of executive management oversight.

The collective work performed by OIT and NDE staff to achieve a high rate of recommendation completion in approximately two years is highly commendable but also reveals some notable accomplishments that will be provided in the sections that follow.

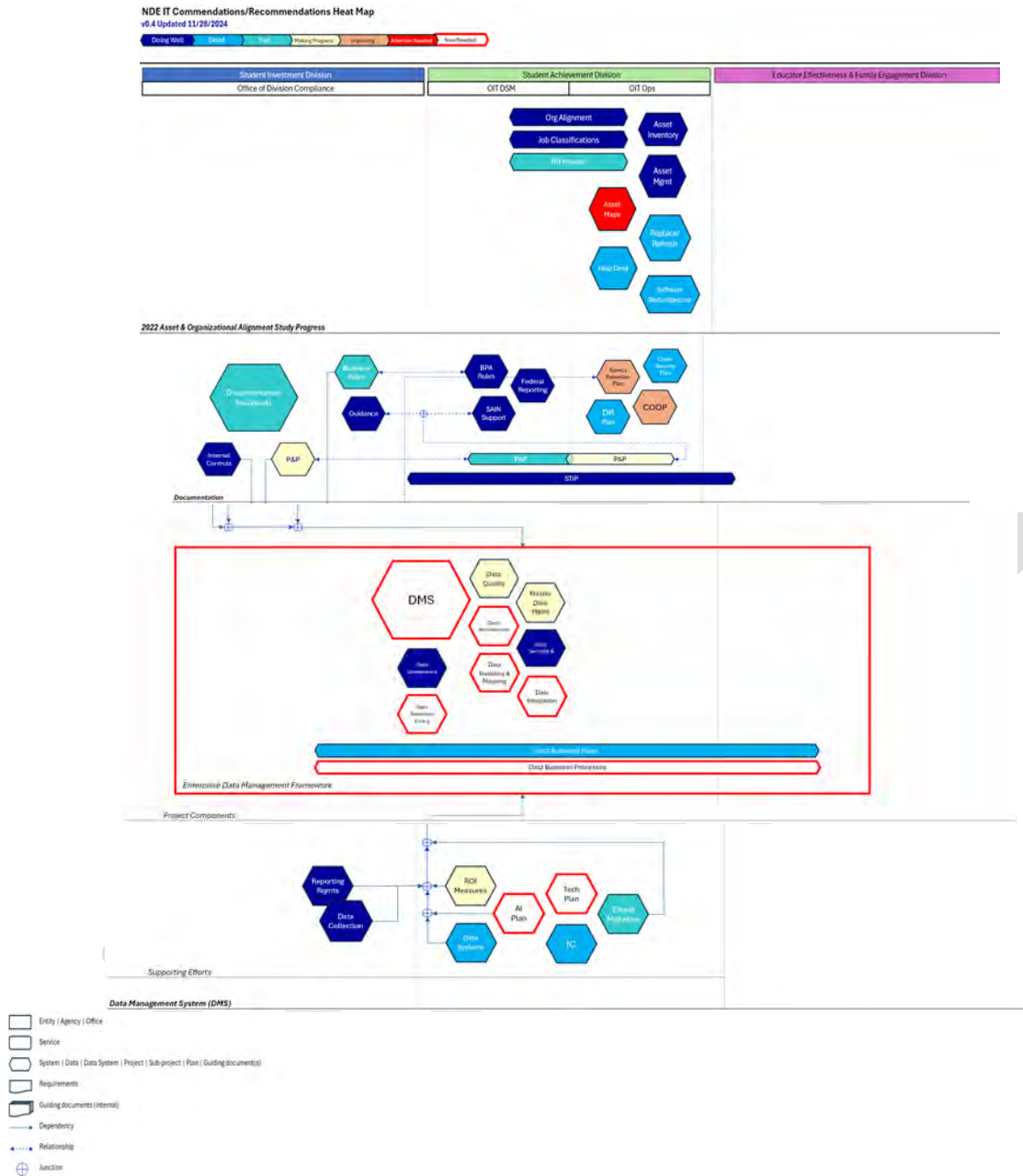
CURRENT STUDY FINDINGS & RECOMMENDATIONS

During the work of gauging progress since 2022, the current efficiency study identified additional areas of commendation and opportunities for NDE to continue their efforts to improve customer service,

perform their operations with fidelity and maximum efficiency, and report ROI measures to those making the investments into Nevada's system of education. Over 62 notable commendations and 49 findings related to NDE OIT were captured and documented during the course of the study. These have been grouped into major and minor topics to make them more presentable in the context of what's working for NDE and what could be improved. Some of these stand alone, but most serve to support and benefit larger initiatives or projects either currently underway or proposed by NDE leadership. **Exhibit 6-10** visualizes these in heat map form structured around the three NDE Divisions in columns, and four major topics in rows. Minor topics are symbolized with color-coded hexagons, and are placed in the column of the accountable Division or Office. They represent various IT related artifacts including systems, data, data systems, projects, sub-projects, plans, or documentation as follows:

- The 2022 NDE Asset & Organizational Alignment Study Progress major topic identifies nine minor topics aligned under the Student Achievement Division OIT DSM and Ops teams. Three of these, Org Alignments, Job Classifications, and the RTI Process, are aligned under both the DSM and Ops teams. The six remaining minor topics Asset Inventory, Asset Management, Asset Maps, Replace/Refresh, Help Desk, and Software Redundancies are aligned under the Ops team.
- The Documentation major topic identifies five minor topics aligned under the Student Investment Division: Documentation Standards, Business Rules, Internal Controls, Policies & Procedures (P&P), and Guidance; three minor topics aligned under the Student Achievement Division DSM team: BPA Rules, Federal Reporting, and SAIN Support; four minor topics aligned under the Student Achievement Division Ops team: Agency Retention Plan, Cybersecurity Plan, COOP (Continuity of Operations Plan), and Disaster Recovery (DR) Plan; one minor topic P&P aligned under the Student Achievement Division DMS and Ops teams; and one minor topic STIP aligned under all three divisions.
- The Data Management System (DMS) major topic is sub-divided into two major sub-topics: Project Components and Supporting Efforts.
 - The Project Components (Enterprise Data Management Framework - DMF) major sub-topic identifies and groups 10 minor topics into an Enterprise Data Management Framework (DMF), which will be addressed as the major sub-topic of the DMS. Two of the 10 minor topics are aligned under both the Student Investment Division and Student Achievement Division, six of the 10 DMF minor topics are aligned under the Student Achievement Division, and two of the 10 DMF minor topics span and are aligned all three Divisions.
 - The Supporting Efforts major sub-topic identifies eight minor sub-topics including Reporting Requirements and Data Collection aligned under the Student Investment Division; ROI Measures, Data Systems, and AI Plan aligned under the Student Achievement Division DSM team; Technology (Tech) Plan and IC aligned under both OIT teams of the Student Achievement Division; and Cloud Migration aligned under the Student Achievement Division Ops team.

EXHIBIT 6-10 HEAT MAP OF OIT RELATED FINDINGS AND RECOMMENDATIONS



Source: Created by the Public Works LLC Team, 2024.

The color-coded minor topics were derived from findings resulting from this study and provide a quick visual perspective of how they align to the NDE organization. Each symbol is color coded to indicate its maturity level in relationship to present day needs, with color codes defined in a continuum from Doing Well, Good, Fair, Making Progress, Improving, and Attention Needed; to New/Needed. Those with color currently exist in some form, while those without color need to be developed.

The major and minor findings and recommendations that follow throughout this chapter are derived from the heat map, which provides the context for their priority and importance in how they are

presented. With over 49 topics that can be addressed, detailing all would become exhaustive and lend marginal value to the overall purpose of this study. As a result, they have been grouped into categories of major and minor findings, with major findings/recommendations given more detailed attention, whereas related minor findings/recommendations are referenced and presented as supporting rationale or reasons. Some can be considered as standalone, as they are neither directly nor indirectly related to any of the others. Some of these are mentioned as they provide relevance to extra steps NDE can take to improve their operational efficiency. The next section starts with the Data Management System, as it will have the most dramatic impact on NDE's operational efficiency overall and will require many supporting efforts related to other findings and recommendations for its success.

FINDING

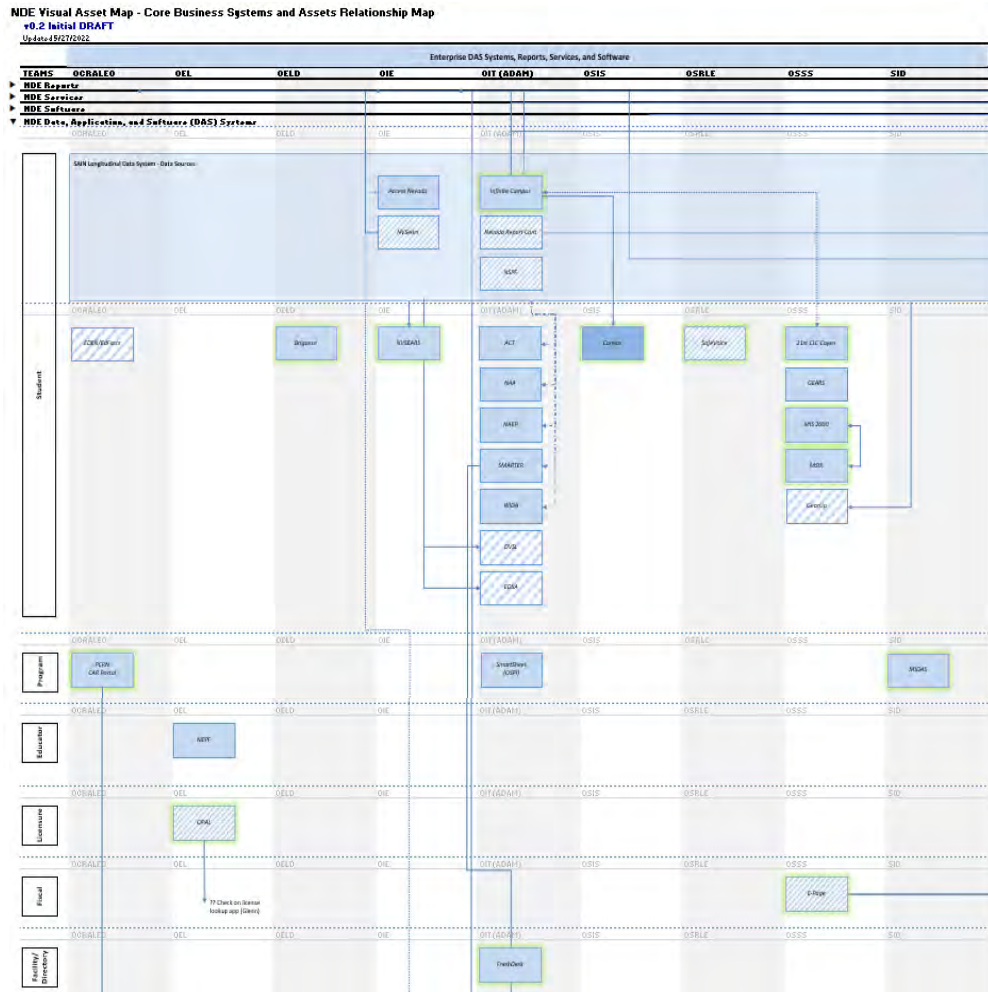
NDE is currently using several fragmented and siloed data systems to manage, analyze, and report on educational data to support evidence-based decision making, improve educational outcomes, and promote transparency in the education system. Working with data in this environment is manual, labor intensive, time consuming, and prone to error.

The NDE Data Systems Management (DSM) team under the Office of Information Technology (OIT) currently supports 36 independent data systems of which 24 are related to student data. NDE's data is fragmented and often redundant among systems, offices, and business processes. Many data sources are manually produced in Excel spreadsheets by staff with varying skill levels, resulting in significant time and resources to ensure data is complete, accurate, and reported on time. Many other data collection and validation processes are inconsistent, and in some cases require multiple levels of crosschecking to ensure the data is as accurate as possible.

While some NDE systems are not cloud based, this results in higher costs for hardware, operations, backup, and business continuity; and redundant systems are needed for failover. There is also a misconception by NDE Offices that IT is responsible for some of their data systems, which is not the case as many are vendor-supported. The dichotomy of NDE and vendor supported data systems creates an additional burden on IT and NDE staff to extract and integrate data for various reporting needs.

In some cases, data needed by NDE from the LEAs is not present in central systems, and conversely, data residing in the central system is redundantly requested from the LEAs placing additional burden on their time and resources. This misalignment of data is symptomatic of fragmented systems and the lack of a defining enterprise data management framework. Misalignment occurs when data distributed across different systems and locations—cloud and/or on-premise—is driven by functional need without planning and adherence to standards designed to preserve the integrity of processes and data enterprise wide. This is also symptomatic of a minimal or incomplete framework that inhibits organizations from achieving full visibility and control of the data and maximizing its full potential. **Exhibit 6-11** shows a subsection of the broader data systems asset map which arranges systems by function in row and by responsible office by columns.

EXHIBIT 6-11 SUBSECTION OF THE NDE DATA SYSTEMS ASSET MAP



Source: NDE 2022 Data Systems Asset Map documentation.

COMMENDATION 6-A:

The NDE OIT teams have maintained a high level of professionalism in maintaining the integrity of data and reporting for a large inventory of enterprise data systems.

Driving this commendation is the DSM team's strict attention to their portfolio of business process automation (BPA) rules, which are spelled out in detail, and any recommended changes to the rules must pass through an approval process (the ICGB, e.g.) and publishing mechanism. The BPAs are very well maintained and never grow stale through an annual review cycle.

Likewise, the Ops manager and team are to be commended for their commitment and diligence in moving NDE's core data stores to the Azure cloud over the last several years. These include the Imart data warehouse, the Snowflake data lake which stores and pushes IC data into Imart, and the CEDs data warehouse for statewide longitudinal data reporting. The work of migrating volumes of data into a new environment is painstaking and time consuming, but this team has done an exemplary job in working to make that shift while staying true to best practices in data quality management and storage.

RECOMMENDATION 6-2:

Procure and implement a modern statewide data management system (DMS) to provide robust and intelligent reporting on return on investment (ROI) measures.

The DMS should assist in gauging the effectiveness of the newly implemented Pupil Centered Funding Plan (PCFP). While NDE has already made the decision to procure and implement a statewide DMS, the total cost of ownership (TCO) – which includes implementation, license, maintenance, hosting, and staffing will not be known until the RFP process is completed near the end of 2025 or early 2026. Furthermore, the recommendation includes an estimate of the number of additional staff NDE can anticipate nearly one year prior to when those numbers will be known in RFP responses. These combined factors can help NDE executive leadership with planning and budgeting during the 2025 legislative session.

Senate Bill 98 and Assembly Bill 400 from the 2023 Legislature discuss implementing, monitoring, reviewing, and revising the new pupil centered funding plan (PCFP) as needed. To gain visibility into its effectiveness, the bills discuss "academic progress made by pupils in each public school" using: "metrics to measure academic achievement" in 12 major areas; "metrics to measure the improvement of elementary pupils enrolled in literacy" in four major areas; "metrics to measure the ability of public schools to hire and retain sufficient staff to meet the needs of public schools" in six major areas; "metrics to measure the extent to which schools meet the needs and expectations of pupils, parents or legal guardians of pupils, teachers and administrators" in three major areas; and "Identify the progress made by each school, school district and charter school on improving the literacy of pupils enrolled in elementary school"; and "Make recommendations for strategies to increase the efficacy, efficiency, transparency and accountability of public schools"; "Make recommendations to the Department, school districts and charter schools to improve the reporting, tracking, monitoring, analyzing and dissemination of data relating to pupil achievement and financial accountability"; and "Review and consider strategies to improve the accessibility of existing and new programs for pupils within and between public schools, including, without limitation, open zoning."¹⁰⁵

With many fragmented data systems and poor experiences with some of their reporting capabilities, supporting educational initiatives and providing useful information is manually intensive with most offices relying on Excel spreadsheets to conduct their core business. Consolidating systems and architecting a comprehensive, standards-based educational data warehouse based on an intelligent reporting strategy would result in a more efficient approach to providing decision makers with the ROI measures they need.

A Data Management System (DMS) is a software framework or suite of tools that facilitates the collection, storage, organization, retrieval, and management of data throughout its lifecycle. It enables organizations to handle their data assets efficiently, ensuring data integrity, security, accessibility, and compliance with governance policies. A DMS encompasses a wide range of technologies and processes, including databases, data warehouses, data integration tools, and data governance frameworks, serving as the backbone for managing structured, semi-structured, and unstructured data, and enabling its use for analytics of ROI measures, decision-making, and operational processes. The Data Management Body

¹⁰⁵ State of Nevada 2023 Legislature Assembly Bill 400,
<https://www.leg.state.nv.us/App/NELIS/REL/82nd2023/Bill/10344/Text>.

of Knowledge (DMBOK2), published by DAMA International, outlines best practices for the essential components of a data management system and their functions.

The core functions of a DMS encompass:

- *Data Integration*: Combines data from multiple sources into a unified system for seamless access and use.
- *Data Governance*: Implements policies, roles, and standards for effective data use and management.
- *Data Quality Management*: Ensures data accuracy, consistency, completeness, and reliability.
- *Data Storage*: Provides repositories such as databases, data lakes, or data warehouses to store data securely and efficiently.
- *Data Access and Retrieval*: Facilitates easy and secure access to data through queries, APIs, or user interfaces.
- *Data Security and Privacy*: Protects data from unauthorized access and ensures compliance with privacy regulations.
- *Backup and Recovery*: Provides mechanisms to prevent data loss and restore it in case of failure.
- *Scalability*: Adapts to increasing data volumes and demands as an organization grows.

The implementation of a DMS will ensure its objectives are attained, ultimately resulting in improved educational services for the citizens of Nevada. In addition, the DMS will result in efficiencies by consolidating many fragmented and siloed data systems; integrating data from distinct domains including finance, HR, and student information – where *students* can refer to information related to districts, schools, or students; improving and automating the data collection and validation processes; simplifying processes related to data file extraction, formatting, exchange, and reporting (many Excel spreadsheets are used Department-wide); eliminating data work that is manual, labor intensive, time consuming, redundant, and prone to error; modernizing reporting on educational data to support evidence-based decision making; and providing opportunities to drive sub-projects for more efficiency gains. NDE does not have the skills nor capacity internally to design and implement a DMS of the required scale and will require outside assistance. NDE technical and functional teams will need to be closely involved in the DMS implementation and gain the appropriate skills and experience over time.

IMPLEMENTATION STEPS:

A multi-step process is needed to successfully procure and implement a DMS, which involves many moving parts and stakeholders. While some of the work can be completed internally by current NDE staff, most of the work will require additional outside help to provide leadership, business and technology expertise, and excellent writing and communications skills. The implementation steps that follow are designed to corroborate subsequent recommendations in this report in direct support of a successful DMS implementation:

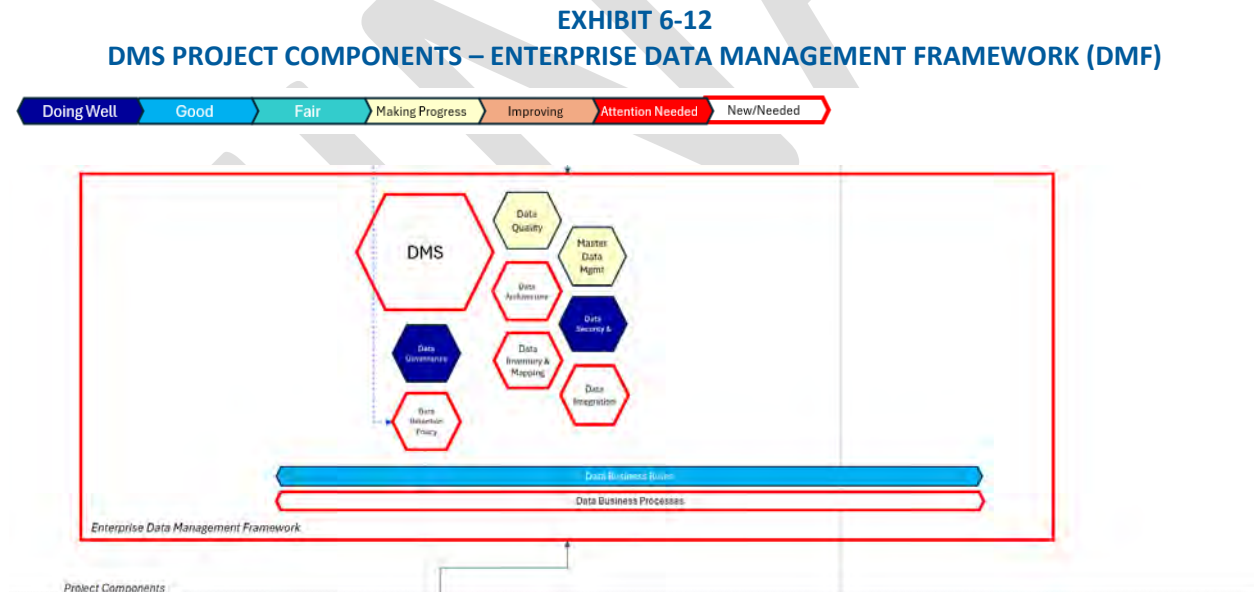
- Review the components of a data management framework (DMF) in **Finding/ Recommendation 6-3** and create a plan for developing and managing those components under the purview of NDE.

- Review the components of a technology action plan in **Finding/Recommendation 6-4** and create a plan for developing and managing those components in direct support of the DMS implementation.
- Review the essential documentation classes described in **Finding/Recommendation 6-5** and create a plan for developing and managing those classes in direct support of the DMS implementation.
- Review the statewide SIS issues described in **Finding/Recommendation 6-6** and work with the ICGB to create a plan for addressing those issues to avoid replicating them in the DMS.

Details surrounding the implementation of a DMS are outside the scope of this recommendation and are deferred to NDE and its project management team.

Exhibit 6-12 repeats the Project Components section of the DMS heat map, which is also referred to as the DMF. Details describing the importance of a DMF are provided in the next section on DMF findings/recommendations. The general components of a DMF are as follows: enterprise data management framework; data governance; data architecture; data inventory and mapping; data business rules; data business processes; data quality management; data security and privacy; data retention policy; data integration; master data management; metadata (data dictionaries, sources of truth, etc.).

It can be seen from the heat map that the components are in various stages of maturity, with some that need to be developed. Details of the DMF are provided in the next finding/recommendation as a major topic, as this will need to be defined and developed concurrently with the DMS implementation.

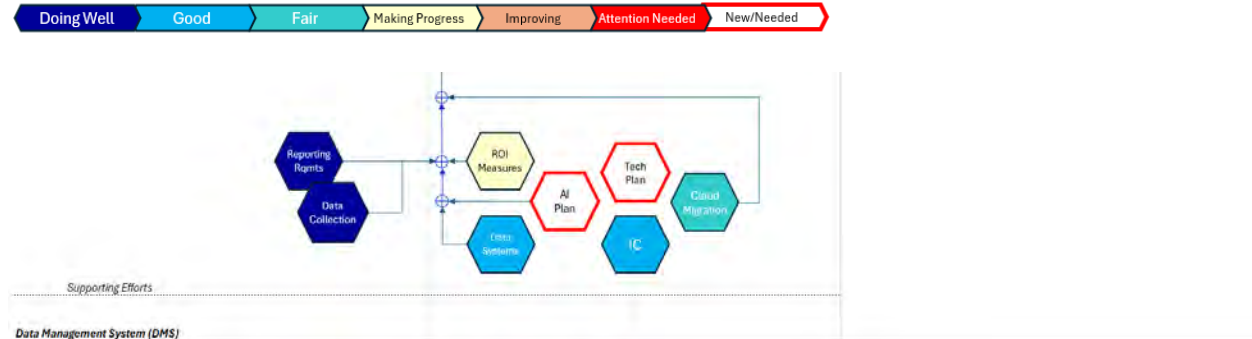


Source: Public Works LLC Team, 2024.

Exhibit 6-13 repeats the Supporting Efforts section of the DMS heat map. The DMS will introduce opportunities for NDE to put into place some very important supporting plans and data related sub-projects that currently don't exist or need to be improved. The most significant project components and

supporting efforts are grouped here to introduce subsequent findings/recommendations resulting from this study.

EXHIBIT 6-13 DMS SUPPORTING EFFORTS



Source: Public Works LLC Team, 2024.

- Supporting Efforts
 - *Asset map update.* The asset map has not been updated since the 2022 IT study.
 - Data systems asset map update. Identifies the systems to be in-scope for a phased implementation.
 - Comprehensive reporting requirements sub-project.
 - ROI measures.
 - Comprehensive data collection sub-project.
 - Data collection is a sub-component of a data business process.
 - *Technology Plan.* NDE does not have a technology plan.
 - First release with emphasis on data management and related DMS support.
 - Artificial intelligence (AI) plan.
 - Cloud migration aligned to a cloud-based DMS.
 - *Stronger functional organizational alignment for documentation management – SID and OIT.* Although not shown in the heat map, a separate recommendation will detail how NDE can benefit from an alignment along various documentation classes.
 - *Infinite Campus (IC) ICG data management review and issues resolution.* As the statewide student information system, various issues identified through this study are identified with accompanying recommendations.

The DMS will have the most direct impact on the DSM team and will require some backfill of critical positions to ensure the project is adequately resourced. The DSM team has expressed the need for additional staff under current conditions, this project will ensure they get the resources they need. With efficiencies expected to be gained, vacancies through attrition can be eliminated in three years with five years to return to normal staffing levels. Public Works LLC is not in a position to estimate the fiscal impact of the project with the full scope and subsequent resource demands unknown.

ADDITIONAL RELATED RECOMMENDATIONS

- NDE should work with their implementation partner to ensure best practices in implementing a DMS are followed in accordance with the DAMA DMBOK2 standard as best as possible. *DAMA International* is a not-for-profit, vendor-independent, global association of technical and business professionals dedicated to advancing the concepts and practices of information and data management. DAMA International is dedicated to advancing the concepts and practices of information and data management and supporting DAMA members and their organizations to address their information and data management needs. DAMA International's *Guide to the Data Management Body of Knowledge (DMBOK)* brings together materials that comprehensively describe the challenges of data management and how to meet them.
- Utilize Smartsheet as a project management tool as it is already widely available and used throughout NDE. There has been a misconception about the lack of use of project management tools in NDE, which is not the case. NDE utilizes Smartsheet as a very powerful project initiation, tracking, and management tool.
- Update the *Data_Systems* section of the *Asset_Map* database of 2022 to identify which systems are to be included in each phase of the DMS implementation.
- Update the Reports section of the *Asset_Map* database of 2022 to identify current and future reporting needs of the DMS.
- NDE has outsourced the development of many data dashboards including as examples: IC KPIs, Portrait of a Learner, Class Size, overall Teacher/Student Ratios, and Teacher Certification. In addition to data collection and validation, NDE should consider augmenting their current skillset to bring that development in-house.

FISCAL IMPACT

Determining a fiscal impact for the DMS project is outside the scope of this project, and is not feasible as the project's scope is not completely known. What can be estimated are additional resources that may be needed to sustain current operations and realize the needed DMF components and DMS supporting efforts identified in this section.

The costs provided here are only estimates of additional resources that the Public Works LLC team believes may be needed in support of the DMS project, assuming the project commences in FY2025-26. Determining estimated actual costs for the management, procurement, implementation, and maintenance of a comprehensive statewide DMS is outside the scope of this project and will be determined through NDE's project planning and procurement processes.

RECOMMENDATION	2025-26	2026-27	2027-28	2028-29	2029-2030	Total 5 year (cost) or saving
Sub-projects in support of DMF components and DMS supporting efforts	(\$250,000)	(\$250,000)	(\$150,000)	(\$100,000)	\$0	(\$750,000)
Technical lead / supervisor (current IT Professional IV) – (1) backfill position	(\$140,106)	(\$142,908)	(\$145,766)	Phased out with attrition	Phased out with attrition	(\$428,780)
IT Professional III – (1) backfill position	(\$128,724)	(\$131,298)	(\$133,924)	Phased out with attrition	Phased out with attrition	(\$393,946)
Business Process Analyst III – (1) backfill position	(\$115,053)	(\$117,354)	(\$119,701)	Phased out with attrition	Phased out with attrition	(\$352,108)
TOTAL COST	(\$633,883)	(\$641,560)	(\$549,391)	(\$100,000)	\$0	(\$1,924,834)

FINDING

NDE's core business is driven by data through at least 36 major data systems, and although a data governance manual and some business rules are defined, a more comprehensive Enterprise Data Management Framework (DMF) is needed. A DMF will help NDE to ensure any future data related efforts fit within a well-defined portfolio of governance, policies, strategies, and the critical aspects of data management.

A data management framework (DMF) serves as a comprehensive blueprint that outlines how an organization manages its data assets. It includes the policies, standards, practices, and technologies required to control data throughout its lifecycle—from creation and storage to processing and deletion. The importance of this framework lies in its ability to provide a structured approach to data governance, ensuring consistency and alignment with the organization's objectives and regulatory requirements. By establishing clear guidelines and responsibilities, a data management framework helps prevent data misuse, enhances data quality, and promotes transparency. It enables organizations to leverage their data effectively for strategic initiatives such as business intelligence, analytics, and digital transformation. Additionally, it fosters collaboration across departments by providing a common language and understanding of data practices, reducing conflicts and inefficiencies caused by misaligned data handling procedures. The major components of a DMF are: Data governance; Data architecture; Data inventory and mapping; Data business rules; Data business processes; Data quality management (data collection methods, validation techniques, etc.); Data security and privacy; Data retention policy; Data integration; Master data management; and Metadata (data dictionaries, sources of truth, etc.).

Data governance. Refers to the collection of policies, practices, processes, and standards established to ensure the effective management and utilization of an organization's data assets. It focuses on ensuring data is accurate, accessible, secure, compliant, and consistent. It involves defining roles and responsibilities for managing data, implementing processes for data quality, and creating frameworks for data usage, storage, and sharing. The key components of data governance include policies and standards, data stewardship, data quality management, access controls and security, auditing and

monitoring, and training and awareness. The NDE Data Governance Manual was last updated in April of 2021, and touches on some of these topics but defines NDE's data governance structure; the Board; the Data Access and Use Policy (DAUP) that covers data collection, access to and disclosure of data, data sharing agreements, and data request management; and data protocols governing storage, retention, training, breaches, and secure methods of transmitting data electronically. While this document serves the needs of the Data Governance Board, it will need to be updated and expanded to address the complexities of a modern DMS designed to report on ROI measures through advanced data collection methodologies, validation, AI generated reporting, and visualizations of near real-time data.

Data architecture. A modern cloud-based data architecture provides the mechanisms to integrate data across domains such as student information, human resources, and finance. It breaks down data silos and consolidates information, making it easier to maintain and reference. Modern data architecture also uses cloud platforms to manage and process data, with economies of scale reducing costs for hardware, operations, backup, and disaster recovery. Cloud computing scalability also enables important data processing tasks to be completed rapidly. The storage scalability helps to cope with rising data volumes, and to help ensure all relevant data is available to improve the quality of training AI applications, which will play an increasingly important role as it matures and becomes more pervasive and available to general consumers.

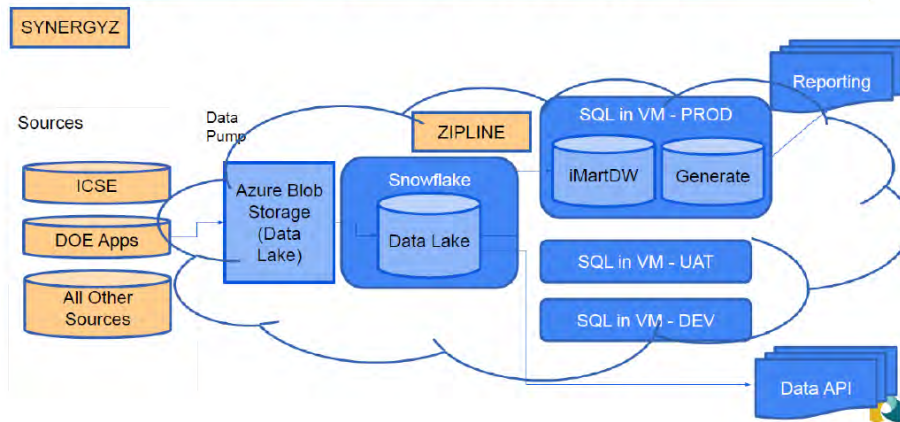
A strategically designed database architecture is vital for enhancing the efficiency and effectiveness of AI-based intelligent reporting that can benefit NDE. By optimizing data storage, retrieval, and processing, such architecture ensures that AI algorithms have rapid access to high-quality data, which is essential for accurate and timely predictions. Efficient data organization techniques—like indexing, partitioning, and normalization—reduce latency and improve throughput, enabling real-time analytics and decision-making. Moreover, a scalable and robust database infrastructure can handle the growing volumes of data required for training advanced AI models, while maintaining data integrity and security. This not only accelerates AI computations but also enhances the overall reliability and performance of AI applications running in the system.

NDE's current data architecture is built upon fragmented systems that have evolved over many years based on need and demand and does not possess the agility to adapt to future expansion and consolidation. **Exhibit 6-14** provides a high-level perspective into NDE's current data architecture, most of which is hosted in the Azure data cloud. Robust data architecture should become a hallmark of the future DMS system described in the previous recommendation.

EXHIBIT 6-14

NDE'S CURRENT DATABASE ARCHITECTURE

Architecture – Existing Environment



Source: NDE OIT, 2024.

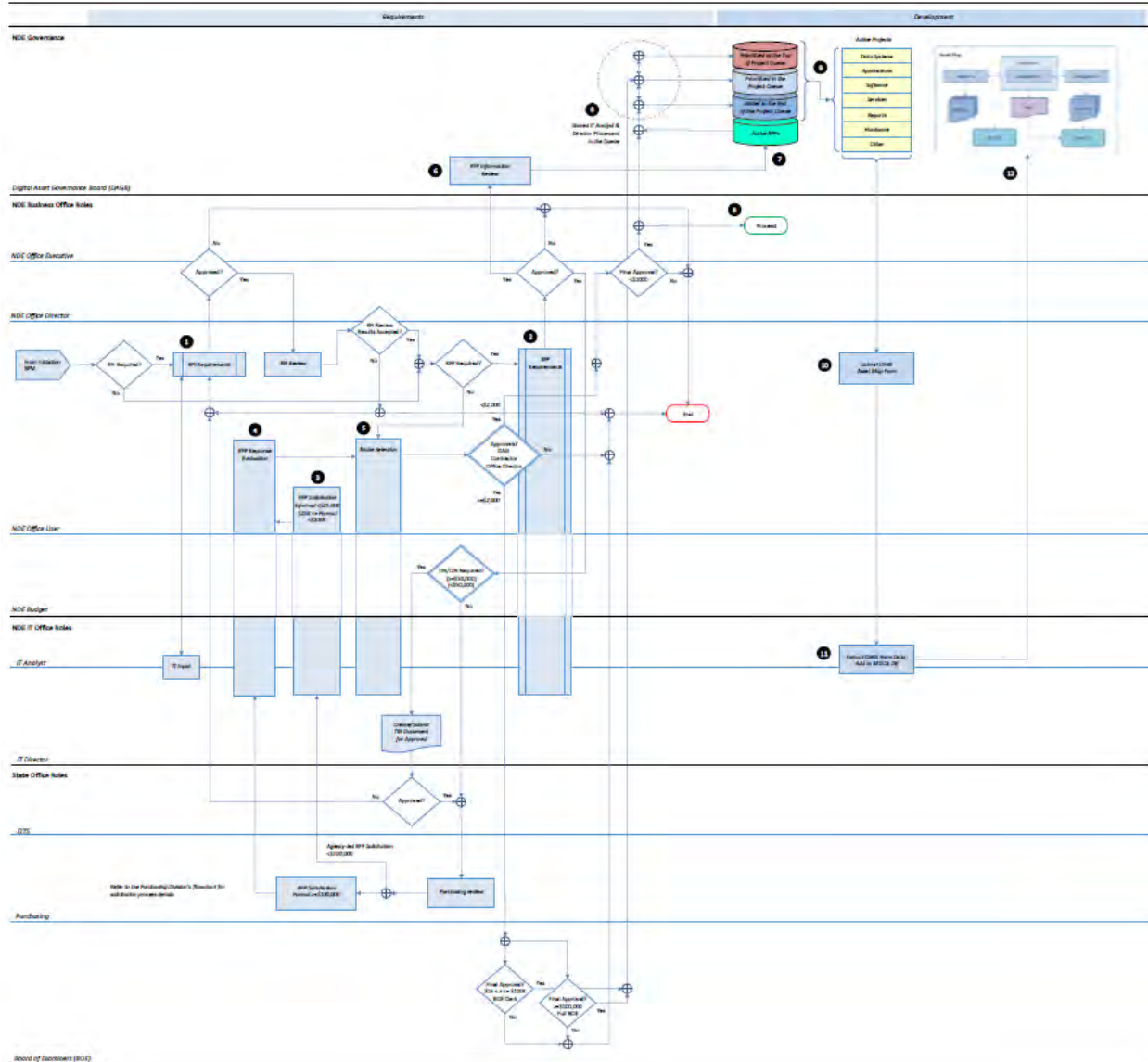
Data inventory, dictionary, and meta-data (mapping). A data inventory is a comprehensive, organized catalog of all data assets within an organization. It provides detailed information about the data, including where it resides, how it is used, and who is responsible for managing it. Data mapping is the process of visually or systematically defining the relationships between data elements across systems, applications, or processes. It can be accomplished through meta-data and dictionary definitions and shows how data flows through an organization and how it is transformed, stored, and shared. A data inventory provides a high-level overview of what data exists and its attributes, while data mapping dives deeper to show how this data is interconnected, flows between systems, and is transformed. Together, these tools are crucial for effective data governance, operational efficiency, and compliance with regulations. During the process of system consolidation, data inventories will serve to eliminate redundancies, identify sources of truth, and associate importance with data categories in hierarchical fashion. NDE does not have a comprehensive data inventory, which will need to be developed in support of future strategic data related initiatives.

Data business rules. Specific guidelines, constraints, or conditions that govern how data is created, managed, used, and interpreted within an organization. These rules ensure that data aligns with the organization's objectives, compliance requirements, and operational processes. The NDE DSM team does an excellent job in maintaining strict business process automation (BPA) rules associated with the systems they certify, including Infinite Campus. All updates are approved through the Infinite Campus Governance Board (ICGB) with documentation reviewed on an annual cycle. Similar standards will need to be extended and applied to future strategic data-related initiatives.

Data business processes. With the exception of enterprise data systems, individual offices within NDE maintain their own procedures governing the collection, validation, storage, and reporting of data for their various programs. Business processes define not only these actions, but also how the data is exchanged in bi-directional fashion with constituents to ensure compliance and accountability. NDE has no documented business processes in standard visual cross-functional flowchart form governing programs and services data flows, like the example shown in **Exhibit 6-15**. Process maps like these, referred to as data flow diagrams in the DMBOK, can help NDE's partners with more in-depth understanding of how the data flows from collection to validation and then storage. NDE should develop

well-documented data business processes for every educational program or services involved with the exchange of data as part of their core business.

EXHIBIT 6-15 SAMPLE CROSS-FUNCTIONAL BUSINESS PROCESS FLOWCHART



Source: NDE Proposed Digital Asset Acquisition Process, 2024.

Data Quality Management (DQM): “Decisions are only as good as the data on which they are based.” (from the 2021 NDE Data Governance Manual). DQM refers to the set of processes, practices, and standards aimed at ensuring that data is accurate, consistent, complete, reliable, and ready for its intended use. It involves systematically monitoring, improving, and maintaining the quality of data across its lifecycle. This involves first conducting a data assessment, then defining the process, tools, and roles for managing data quality, which is also known as the DQM Framework. A very important next step involves validation during and following the data collection process. The stronger the validation during collection, the less maintenance is required downstream. Data quality software tools can be used to

automate and scale data quality processes. Continuous monitoring to track quality metrics can help ensure sustained improvements throughout the lifecycle. Aspects of DQM are applied to some enterprise data systems at NDE, specifically Infinite Campus, but should be expanded and applied to all strategic data systems including the target domains of student, HR, and finance data.

Data Security and Privacy. The word security is used 46 times in NDE's 30-page Data Governance Manual, which outlines (1) the importance of data governance, (2) the mission, responsibilities, and structure of the Board, and (3) the data policies, procedures, and practices established by the Board. With these practices in place, NDE has been able to consistently and more efficiently manage the full life cycle of data that moves through the organization and ensure that data is secure according to federal data security law, Nevada State data security law, and state statutes related to student data privacy. In summary, the Federal Educational Rights and Privacy Act (FERPA) of 1974 cited in 20 U.S. Code (USC) §1232g and 34 CFR §99, safeguards the privacy of student education records by regulating how such data is shared and disclosed. It sets the baseline (policy floor) for student data privacy and security nationwide. The Nevada Legislature enhanced FERPA's protections through the following additional statutes:

- NRS 288.267: which mandates NDE to adopt data privacy policies aligned with federal and state laws.
- NRS 388.272: which requires NDE contracts involving personally identifiable information (PII) to include specific data protection clauses.
- NRS 388.273: which directs NDE to implement a data security plan for the collection, maintenance, and transfer of pupil-related information.

NDE complies with the Consolidated State Information Security Policy (SISP), which was developed by the Nevada Department of Enterprise Information Technology Systems (EITS) Office of Information Security (OIS). It is based on ISO/IEC 27002:2005 (International Standards for Information Security Management) and aligns with the NIST Special Publication 800-series (National Institute of Standards and Technology guidelines). Nevada's SISP provides a robust framework for data security across state agencies, leveraging international and national standards for best practices. All state agencies except the Nevada System of Higher Education (NSHE) and the Nevada Criminal Justice Information Computer System must comply. NDE also actively participates in the State Security Policy Committee to refine and enforce security policies.

The data security plan is embedded in the Data Governance Manual covering all systems used for the collection and dissemination of such information. The manual needs to be updated to reflect changes introduced through strategic initiatives involving data consolidation; new processes and procedures governing data collection, validation, transfer, and reporting; and inclusion of systems previously outside of the enterprise range.

Data retention policy/plan. A data retention plan outlines how long an organization keeps different types of data, and the methods for securely archiving or disposing of it after its retention period expires. This plan is important for several reasons as follows:

- It ensures compliance with legal and regulatory requirements, which often mandate specific retention periods for certain types of data, such as financial records, employee information, or customer data. Non-compliance can result in legal penalties, fines, and reputational damage.

- A data retention plan helps organizations manage on-premise and cloud storage costs by eliminating unnecessary data that consumes valuable resources. This is especially important given the exponential growth of data volumes in the present digital age.
- By regularly disposing of outdated or irrelevant data, organizations reduce the risk of data breaches, as there is less sensitive information that could be compromised.
- A well-defined data retention plan improves data management efficiency, making it easier for employees to find relevant information without searching through obsolete data.

NDE does not have a fully developed data retention policy/plan specific to the educational data under their purview. Given the scale and complexity of their core business data needs and strategic initiatives, one will have to be developed to address the efficiencies listed above. Data retention planning is covered in more detail in **Finding/Recommendation 6-4**.

Data Integration: Data integration is the process of combining data from multiple sources into a unified and coherent view, enabling consistent access and delivery across an organization. It involves collecting, transforming, and consolidating data from various systems, formats, and locations to ensure that it is accurate, compatible, and usable for analysis, reporting, gauging ROI measures, and decision-making. Data integration facilitates seamless data flow and supports business processes by eliminating silos, improving data quality, and enabling insights from diverse datasets. The NDE DMS project in its entirety can accurately be viewed as a comprehensive data integration project, as every aforementioned component is encapsulated in a very concise form. As NDE moves forward with researching alternative solutions and implementation techniques in support of their strategic plan, consideration can be given to common approaches including Extract, Transform, Load (ETL) processes (which are currently used by the OIT team), data virtualization, and real-time integration techniques, making it a generational cornerstone of data management and analytics strategies for years to come.

Master Data Management (MDM): Master data management is the comprehensive process and framework for creating, managing, and maintaining a consistent, accurate, and authoritative single source of truth for an organization's critical data. Master data refers to the essential, shared data that spans across various business domains, such as student, HR, finance, and facilities. MDM involves the integration, cleansing, and synchronization of master data from different systems and sources, ensuring consistency, reliability, and accessibility across the organization. This process typically relies on technology solutions and governance practices to enforce data quality and compliance. In a brute force data integration implementation, data from siloed systems would be combined with no regard for integration and eliminating redundancies, resulting in potentially many instances of replicated data fields. The integration approach required by MDM would identify and eliminate as many redundancies as possible, resulting in an identified single source of truth for each data type. The MDM framework does not currently exist among NDE's fragmented and siloed systems and will need to be developed in support of goals set forth in their business and data strategies. While some master data exists in the student domain, others will need to be identified and documented for the HR and finance domains.

COMMENDATION 6-B:

OIT's small DSM team of four database administrators and three developers is commended for effectively and responsibly managing all aspects of NDE's core business data functions, including the components of a DMF currently in place.

Although the DSM team manager has expressed their need for more staff, the team continues to operate with a spirit of optimism and a do-what-it-takes approach to getting the job done. This team should be made an exemplar for the much-needed OIT Ops team documentation, and for others – specifically in the Office of Division Compliance. Related to the previous point, the policies and procedures, business rules, and systems they have in place for maintaining them, should likewise be made exemplars for others in NDE to follow. DSM team business process automation (BPA) rules are strictly maintained, with updates approved through the Infinite Campus Governance Board (ICGB). This team has established a high-quality standard. The DSM team has established a yearly review cycle on all documentation. Federal reporting through the combination of EDFacts and SAIN data uploaded into the EDPass system is very strong.

RECOMMENDATION 6-3:

Through an analysis of the heat map from Exhibit 6-7 of Finding/Recommendation 6-2, identify the components of a Data Management Framework (DMF) that need to be developed and improved, and develop an action plan toward that end as follows:

1. Update the data governance manual in support of an aligned business and data strategy.
2. Develop a data architecture to accommodate an aligned business and data strategy.
3. Create a comprehensive data inventory.
4. Extend standards practiced by the DSM team to others in NDE.
5. Document data business processes for every educational program or service that utilizes the exchange of data as part of their core business.
6. Apply DQM principles to all strategic data systems including the target domains of student, HR, and finance data.
7. Identify and document new data security policies needed in support of aligned business and data strategies.
8. Utilize best practices approaches to integrate data during the DMS implementation.
9. Develop a master data management framework to include data domains other than student data.

Without an enterprise data management framework, organizations are exposed to operational inefficiencies, compliance risks, and strategic disadvantages. A lack of structured DMF leads to higher costs, missed opportunities, and potential reputational damage, making it increasingly difficult to compete in a modern, data-driven landscape. Implementing a DMF is essential to unlock the full potential of data and drive sustainable growth. But an enterprise DMF requires context to maximize potential benefits, and such context can be realized through the alignment of NDE's business and data strategies.

Organizations face challenges in developing effective strategies, with only 30 percent successfully aligning strategies with business operations, leading to wasted investments and inefficient analytics. Many manage data sporadically, often achieving limited successes in isolated projects or departments. Without a cohesive organizational strategy, efforts become misaligned, slowing progress and resulting in siloed data that fails to support integrated business operations.

A data strategy is a high-level plan of decisions that guide the use of data to achieve organizational goals, aligning with broader business objectives, and leading to improved operational efficiency. It enables organizations to leverage data for their constituents to better understand, systems development, and competitive advantage. Importantly, it provides structure to ensure data management efforts stay focused on delivering operational value and measurable outcomes.

IMPLEMENTATION STEPS:

The DMF should be planned and implemented in the context of an overarching business strategy aligned to a cohesive data strategy. In addition to a data management system, the DMBOK also outlines best practices for the structure and implementation of a comprehensive framework for data management. According to the DMBOK, a Data Management Framework (DMF) consists of the following key components, often referred to as data management knowledge areas. The steps to updating or implementing a DMF are as follows:

1. Establish new roles and responsibilities for the Data Governance Board
 - a. Review and update the purposes and responsibilities of the current Data Governance Board:
 - i. Include stakeholders from various offices and possibly LEAs and other stakeholders.
 - ii. Define clear roles: Data Owners (responsible for specific data sets), Data Stewards (manage data quality and compliance), and Data Custodians (handle technical aspects of data storage and security).
 - b. Develop Policies and Standards:
 - i. Create comprehensive data policies covering data acquisition, usage, sharing, and security.
 - ii. Establish data standards for data formats, naming conventions, and metadata.
2. Ensure Compliance with Legal and Regulatory Requirements
 - a. Adhere to FERPA and State Privacy Laws:
 - i. Implement procedures to protect Personally Identifiable Information (PII).
 - ii. Provide annual training on privacy laws to all staff handling student data.
 - b. Stay Updated on Regulations:
 - i. Assign a compliance officer to monitor changes in laws and regulations.
 - ii. Regularly review and update policies to reflect new legal requirements.
3. Implement Data Quality Management
 - a. Data Validation Processes:
 - i. Incorporate validation rules at the point of data entry.
 - ii. Use automated tools to detect and correct data anomalies.
 - b. Data Quality Metrics:
 - i. Establish Key Performance Indicators (KPIs) for data accuracy, completeness, and timeliness.

- ii. Regularly report on data quality metrics to the Data Governance Council.
- 4. Develop Comprehensive Metadata Management
 - a. Create a Centralized Metadata Repository:
 - i. Document data definitions, source systems, data owners, and usage guidelines.
 - ii. Use metadata to facilitate data discovery and promote data literacy among staff.
 - b. Maintain Data Lineage:
 - i. Track data transformations and movements across systems.
 - ii. Utilize data lineage for impact analysis and compliance reporting.
- 5. Implement Data Lifecycle Management
 - a. Define Data Lifecycle Stages:
 - i. Outline stages from data creation and storage to archiving and disposal.
 - ii. Assign responsibilities for each stage to ensure accountability.
 - b. Automate Data Lifecycle Processes:
 - i. Use data management tools to automate archiving and deletion based on retention schedules.
 - ii. Ensure that automated processes are audited regularly for compliance.
- 6. Enhance Security and Privacy Measures
 - a. Data Classification:
 - i. Classify data based on sensitivity levels (e.g., public, internal, confidential).
 - ii. Apply appropriate security controls for each classification level.
 - b. Access Controls and Encryption:
 - i. Implement role-based access control (RBAC) to restrict data access.
 - ii. Encrypt sensitive data both at rest and in transit.
 - c. Regular Security Assessments:
 - i. Conduct vulnerability assessments and penetration testing.
 - ii. Address identified vulnerabilities promptly.
- 7. Foster a Culture of Data Literacy and Responsibility
 - a. Training Programs:
 - i. Offer regular training on data policies, tools, and best practices.
 - ii. Encourage professional development in data management and analytics.
 - b. Communication and Collaboration:
 - i. Promote cross-departmental communication to align data initiatives.
 - ii. Recognize and reward adherence to data management best practices.

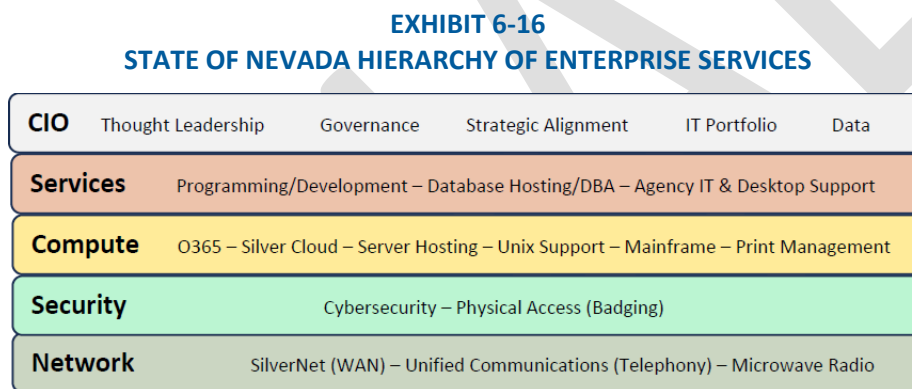
FISCAL IMPACT

Some components of the DMF can be developed internally and are cost neutral. Others can be tied to the scope of the DMS implementation and can be cost estimated as part of that project.

FINDING

NDE does not have an agency specific technology plan to strategically plan and allocate resources and equipment for the many education programs and services they support.

NDE relies on Nevada state technology plans for their strategic and operational technology planning. As an agency of the state, they are not required to develop a plan, but they are required to support agency specific technologies according to the division of responsibilities shown in **Exhibit 6-4**. According to the vision of the state of Nevada *Statewide IT Strategy Overview*, several guiding principles, key pillars, and strategic objectives outline how the state plans to accomplish their mission: “Nevada’s Digital Revolution will establish modern enterprise technology solutions and services, benefiting Executive branch partner-agencies through effective and efficient delivery, enabling vital services to Nevadans.” Similar to the iceberg metaphor earlier in this chapter, the strategy overview depicts a hierarchy of enterprise services as shown in **Exhibit 6-16**.



Source: State of Nevada Statewide IT Strategy Overview, 2024.

While these services are needed by agencies, including NDE to conduct their business, they only go as far as meeting the general needs of all agencies. The following are but a few of many possible examples taken from interviews with IT staff and information in the division of responsibilities table of **Exhibit 6-4**. To begin, the state provides the Microsoft 365 licenses for all state employees, but application support is not provided to end users – the NDE IT help desk is contacted to provide that assistance. Similarly, the state provides co-location hosting facility for servers, but configuration and administration of application specific NDE servers is provided by the OIT Ops team. Furthermore, while the state provides enterprise level network and internet cybersecurity, the OIT Ops team is responsible for endpoint (device) security – which if not protected correctly, can present significant cybersecurity vulnerabilities. Expanding upon this last cybersecurity example, the OIT Ops team must take the following necessary precautions to ensure endpoint security is strong and maintained:

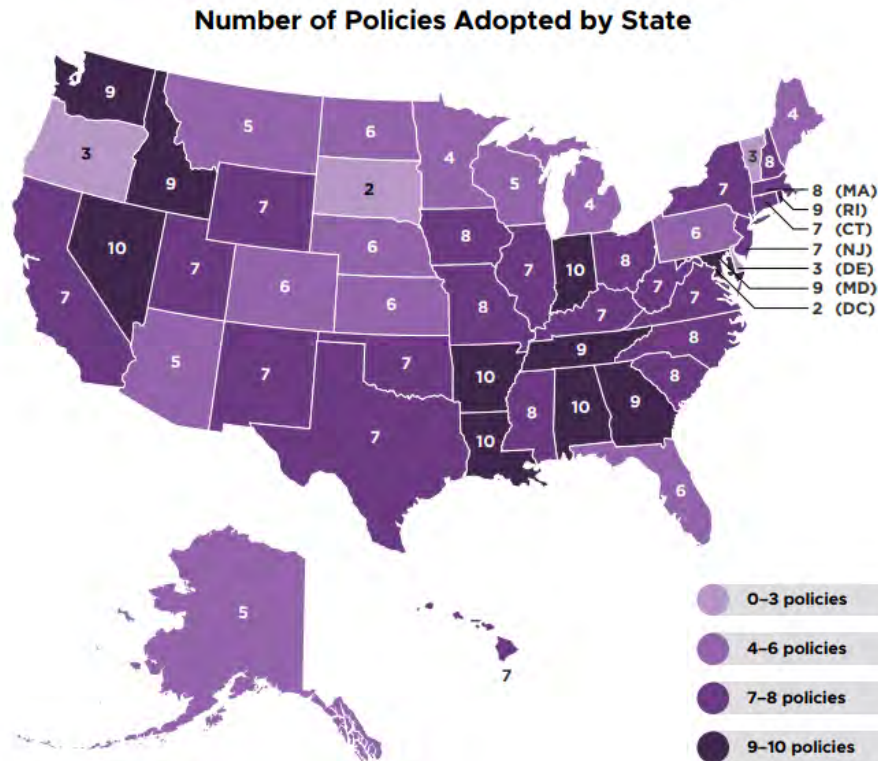
- Phishing and social engineering: Implement **email filtering** and **anti-phishing** tools; provide **security awareness training** to recognize phishing attempts; and use **multi-factor authentication (MFA)** to mitigate compromised credentials.

- Unpatched software and operating systems: Deploy **automated patch management systems** to ensure timely updates; maintain an **inventory of endpoint devices and software** for regular audits; and use **vulnerability scanning tools** to detect and remediate weaknesses.
- Malware and ransomware: Install **next-generation antivirus (NGAV)** and **endpoint detection and response (EDR)** solutions; enable **behavioral analysis tools** to detect anomalies in endpoint activities; and maintain **regular data backups** and test **recovery plans**.
- Unauthorized access: Enforce **strong password policies** and MFA; use **identity and access management (IAM) tools** for role-based permissions; and enable **session timeouts** and **auto-lock features** on idle devices.

With a small DSM team of seven FTEs, and a smaller Ops team of six FTEs supporting all NDE employees, this example illustrates the complexity of their work when detailed responsibilities like these are expanded for every technology, application, and system they support. Paraphrasing some of the information in the division of responsibilities of **Exhibit 6-4**, NDE's OIT Ops team is responsible for many hundreds of network and endpoint devices and their operating systems, and a like number of NDE specific servers, software systems, applications, data systems, and reports. Adding these together and expanding related responsibilities into a list like the example above, it becomes immediately clear that the State and its strategic plans cannot meet the specific needs of every agency, and for the purposes of this report, the education specific strategies and goals as set forth by NDE.

The 2020 NDE Statewide Plan for the Improvement of Pupils (STIP) along with its 2024 addendum addresses technology from an educational perspective through collaboratives such as with the Governor's Office of Science, Innovation, and Technology (OSIT), which works to designate the Governor's Science, Technology, Engineering, and Math (STEM) schools as well as the Governor's STEM Council. The STEM Advisory Council's Subcommittee on Computer Science promotes high-quality K-12 computer science instruction statewide. This same team has been responsible for promoting high speed internet access in rural Nevada communities. NDE has been a leader in expanding access to hands-on learning and career and technical education (CTE) to give more students access to technology and computer science education that prepares them for digital citizenship and the future of work. NDE also provides general leadership statewide in matters related to instructional technology through the Office of Teaching & Learning. In summary, the STIP and its addenda focus mainly on technologies that directly impact instruction, paving the way to make the state of Nevada a national leader in high-tech education as seen in **Exhibit 6-17**.

EXHIBIT 6-17
COMPUTER SCIENCE EDUCATION POLICIES ADOPTED BY STATE



Source: 2024 State of Computer Science Education report published annually by the code.org advocacy group.

While NDE has made major strides in leading the nation in aspects of technology education, reliance on State technology plans to address their specific IT needs has cultivated a department that is more reactive and plans by whiteboard – meaning the most important short- and long-term priorities and projects can be found in a checklist on an office whiteboard. Without an agency specific technology plan, NDE will face difficulty aligning technology solutions with business goals, optimizing resource allocation, and preparing for growth and innovation – which are all critical components for long-term success with the major initiatives addressed through recommendations in this chapter.

Fragments of a cohesive technology plan, which are mostly applicable to instructional technology, can be found within the NDE Career and Technical Education (CTE) website (<https://doe.nv.gov/offices/craleo/cte>), and are lost in a blend of other topics ranging from Agriculture Food, and Natural Resources; to Transportation, Distribution, and Logistics. As part of the broader CTE focus, the strategic power technology holds to transform business and learning is diluted by less influential emphases. Technology planning historically has not been part of general strategic planning and is not part of the NDE culture. If IT investments are to be advocated as part of NDE strategic investments, they would more likely gain buy-in and support from the right groups for the fiscal benefit of the Department if promoted differently. As a cost center of NDE's general fund, technology initiatives should be tied to strategic educational initiatives, tied to ROI measures; and then be planned and championed as such by bringing them front and center into a technology focused platform.

COMMENDATION 6-C:

Without any formal plans in place, NDE OIT used parts of the Asset Map and Organizational Alignment study of 2022 as a roadmap for strategic planning and operational efficiency.

Recommendations from studies of that kind can be made actionable or set aside until sufficient time and resources are available to become a priority. NDE chose the former, realizing that implementing the recommendations would eliminate unnecessary impediments and free up resources. In a sense, that study became an agency-specific, prescriptive technology plan to serve them in the short term. Detailed accomplishments noted during this study are as follows:

- A Request to Initiate (RTI) Smartsheet process was implemented to provide visibility to IT and other stakeholders when new initiatives, projects, or acquisitions are requested. This new process was designed as an alternative to a recommended IT governance structure resulting in faster turnaround time for approvals and less meeting time demand for executives.
- Macro-level organizational alignment is complete, meaning the formerly separated technology teams were combined under a single IT office.
- Most work assignments for positions under the new organization have been aligned with their job classifications.
- IT asset inventory is up-to-date and continues to be maintained as a high priority for the OIT Ops team. This includes device replace/refresh triggers and correct budget assignments.
- The OIT Ops team implemented the Quest KACE comprehensive systems management and IT asset management software for network-connected devices.
- The FreshService ticket tracking system was split into two separate instances to create two help desks: (1) one for the DSM team, and (2) the other for the Ops team. This has led to more efficiency by managing tickets for each of their respective groups.
- Technical support response times have been reduced to three to four minutes for ticket resolution.
- Cloud migration: Systems/Data are being consolidated into a single location – although it is a long path forward, migration to the cloud is progressing: Virtual Machines (VMs) and H: drive contents have been moved, G: and P: remain to be cleaned and moved.
- Video meeting redundancies have been eliminated.

Results from the Nevada Department of Education Efficiency Assessment Staff Survey show overwhelming positive feedback on the services OIT provides to staff. Respondents showed on average over 90 percent agreement or strong agreement on questions related to technical support and response time. Of the 33 comments entered, most were accolades of the staff using words like awesome, fantastic, and superior cited. Interviews with leadership identified OIT as being very responsive and helpful to the offices, with an improvement in culture and tone.

RECOMMENDATION 6-4:

Create an NDE specific technology action plan to supplement the Statewide IT Strategy for FY23 – FY27.

A Technology Action Plan for NDE is named in a manner to avoid a misconception that it intends to supplant the state's technology plan. Rather, it serves to supplement the state plan by addressing NDE specific IT needs according to the division of responsibilities, and in a phased manner targeting the highest priority issues first. Over time, the plan can be extended to address lower priorities or new issues as they are presented.

An NDE specific Technology Action Plan is a strategic roadmap that outlines how NDE will use technology to achieve its business goals. It includes an assessment of current technological capabilities, identification of technology needs, prioritization of projects, budget considerations, and timelines for implementation. The importance of a Technology Action Plan lies in its ability to align technological initiatives with NDE's overall strategy, ensuring that investments in technology provide tangible benefits and support growth objectives. By planning proactively, NDE can anticipate future technological trends and disruptions, allowing them to better respond to new requirements or changes in the operational environment, such as employee turnover, legislative mandates, or the addition of programs or services. A Technology Action Plan will help with resource allocation, ensuring that limited funds and personnel are directed toward the most impactful projects. Moreover, it will facilitate risk management by identifying potential technological challenges and developing mitigation strategies. A well-executed plan will enable NDE to innovate, improve operational efficiency, and enhance customer experience through the adoption of new technologies.

Through strategic technology action planning, NDE OIT can effectively plan their goals and resources to address various issues in a strategic, targeted manner. A first release of the plan can focus mainly on issues identified through this study. A critical evaluation of those issues revealed that some will either resolve themselves, as in the lack of training for the Advantage 4.0 upgrade as of Q3 2024 or are symptoms of a bigger issue – which in this case is a simple lack of planning. The following is a list of those issues with recommendations for addressing them in the action planning process:

1. Planning to plan, or meta-planning. *“A failure to plan is a plan to fail”* can never be overused, as its inherent truth is transformative and applicable to any situation. The *NDE Technology Action Plan v1.0* must include a **meta-plan**, which involves creating a high-level framework for how the actual planning process will be conducted, and which subordinate plans will be developed. The meta-plan assigns responsibilities and timelines to staff in project management form, with the work getting done when accountability factors are at play. In addition to the technology action plan itself, the following five subordinate plans need to be addressed:

- An updated **Disaster Recovery (DR)** plan is needed. The state of Nevada mandates that its agencies develop and maintain disaster recovery and emergency management plans. This requirement is outlined in Nevada Revised Statutes (NRS) Chapter 414, which governs emergency management within the state. Key provisions include:
 - **State Emergency Management Plan:** NRS 414.060 assigns the Governor the responsibility to oversee the state's emergency management plan, ensuring that all state agencies are prepared to respond to emergencies and disasters. This includes the development of comprehensive plans that address mitigation, preparedness, response, and recovery.
 - **Agency-Specific Plans:** NRS 414.043 requires each state and local governmental agency to adopt a plan to respond to emergencies or disasters. These plans must include provisions for continuity of operations, ensuring that essential functions can continue during and after a disaster.

- **Annual Review and Training:** NRS 414.044 mandates that these plans be reviewed and revised annually. Additionally, agencies must conduct training to ensure personnel are familiar with the procedures and can effectively implement the plans during an emergency.
- Updated *continuity of operations plan (COOP)* is needed (aka *Business Continuity Plan, BCP*). The State of Nevada requires its agencies to develop and maintain **Continuity of Operations Plans (COOP)** to ensure the continuation of essential functions during emergencies or disruptions. Key provisions include:
 - **Nevada Revised Statutes (NRS) Chapter 239C:** While NRS 239C.260 establishes a plan for the continuation of state and local governmental operations in the event of a catastrophic emergency, it does not explicitly mandate individual agencies to create COOPs. The NDE IT team stated they are required to have one.
 - **Statewide COOP Planning Project:** Nevada has implemented a Homeland Security grant-funded project aimed at developing COOPs for jurisdictions and their community partners. This initiative utilizes a web-based planning system designed to assist agencies in creating and maintaining their continuity plans.
 - **Division of Emergency Management (DEM) Guidance:** The DEM provides technical assistance to city, county, tribal, and state agency emergency management programs in developing all-hazards emergency operations plans, including COOPs. This support ensures that agencies can continue essential services when directly impacted by emergencies or disasters.
 - **Implementation Support:**
 - **Planning Resources:** The DEM offers resources such as the *Nevada Emergency Operations Planning Guide*, which supplements FEMA's *Comprehensive Preparedness Guide* and includes state-specific information to aid in COOP development.
 - **Training and Exercises:** Agencies are encouraged to engage in regular training and exercises to test and refine their COOPs, ensuring readiness and resilience in the face of potential disruptions. In addition to a COOP plan, the NDE technology action plan should include plans for training and exercises to test their COOP.
 - *In summary, while there may not be a specific statutory mandate for each agency to develop a COOP, Nevada's legislative framework and state initiatives strongly advocate for and support the development and maintenance of continuity plans across all state agencies to ensure uninterrupted essential services during emergencies.*
- *Cybersecurity plan* for local endpoint security is needed, NDE OIT is currently relying on the state's plan which does not address the NDE specific details. The State of Nevada mandates that its executive branch agencies develop and maintain comprehensive cybersecurity plans to protect information systems and data. Key requirements include:
 - **State Information Security Program Policy:** This policy establishes the principles and terms for the Information Security Program across Nevada's Executive Branch. It requires each agency to implement an information security program that aligns with state policies, standards, and procedures. Agencies must designate an Information Security Officer (ISO) responsible for developing, implementing, and maintaining the agency's cybersecurity plan. NDE has a designated ISO and backup ISO in place on the systems administration team.

- **State Security Policies, Standards, and Procedures:** Nevada has adopted a comprehensive set of security policies, standards, and procedures that define the baseline for agencies' information security programs. These documents provide detailed guidance on various aspects of cybersecurity, including risk management, incident response, access controls, and data protection. This information should be extended to address NDE specific issues related to endpoint security.
- **Office of Cyber Defense Coordination (OCD):** Serving as the primary focal point for cybersecurity strategy, policy, planning, and coordination, the OCD assists state agencies in developing and enhancing their cybersecurity plans. The office provides guidance and support to ensure that agencies' cybersecurity measures are robust and effective.
- **Implementation and Compliance:**
 - **Annual Reviews and Updates:** Agencies are required to review and update their cybersecurity plans regularly to address emerging threats and ensure alignment with state policies. This process involves assessing current security measures, identifying vulnerabilities, and implementing necessary improvements. Triggers and timelines for completing these reviews and updates should be included in the NDE technology action plan.
 - **Training and Awareness:** To ensure effective implementation of cybersecurity plans, agencies must provide regular training and awareness programs for their employees. This includes educating staff about security policies, potential threats, and best practices for safeguarding information systems.

In summary, Nevada's executive branch agencies are obligated to establish and maintain cybersecurity plans in accordance with state policies and standards. These plans are essential for protecting the state's information systems and data from cyber threats. With NDE heavily reliant on data systems for their core business, the importance of these plans cannot be overstated.

- *Updated data retention plan is needed.* The state of Nevada requires its agencies to establish and adhere to data retention plans to ensure the proper management, preservation, and disposition of official state records. Key Legislative requirements:
 - **Nevada Revised Statutes (NRS) 239.080:** This statute mandates that official state records may only be disposed of in accordance with a retention and disposition schedule approved by the *Committee to Approve Schedules for the Retention and Disposition of Official State Records*. Agencies, boards, and commissions are required to develop such schedules in cooperation with the Division of State Library, Archives, and Public Records.
 - **Nevada Administrative Code (NAC) 239.696 and 239.697:** These regulations require state agencies to establish a records management program that documents their organization, functions, policies, decisions, procedures, and essential transactions. The program must include controls for the creation, maintenance, use, security, and distribution of records, ensuring adherence to appropriate retention schedules and facilitating rapid retrieval and protection of information.
 - **Development of Retention Schedules:** Each agency is responsible for developing a schedule for the retention and disposition of each type of official state record, in cooperation with the Division of State Library, Archives, and Public Records. These schedules must be submitted to the Committee for final approval.

- *Artificial Intelligence (AI) plan.* A state-led focus group is exploring how machine learning and AI tools can enhance IT workforce efficiency and efficacy. This effort needs to be expanded through an NDE specific AI action plan to provide structured guidance to NDE offices in support of their business needs. The NDE IT team has received various requests from NDE office leaders to assist them with AI related work projects. In the absence of sufficient knowledge about the technology, a strategy, and a plan, IT will not be sufficiently prepared to respond to and provide useful guidance.

To bind these into a more cohesive portfolio, NDE may consider as a best practice a web presence dedicated to organizing and making accessible the various technology specific plans it develops and maintains with instructional and IT topics combined in the same site. The Virginia Department of Education, one of the peer districts reviewed in this study, is referenced here as an example as it is the single peer whose CIO reports directly to the State Superintendent.¹⁰⁶ Although classified as an IT initiative and embedded in the context of Digital Learning Integration > Educational Technology Planning, the Virginia Longitudinal Data System (VLDS) is showcased as a strategic IT investment designed to directly support instruction.

Best practices for strategic technology planning and development are available through research channels like Gartner (which provides in-depth reports on IT strategy, digital transformation, and technology planning) and Forrester (which offers insights into technology planning, innovation strategies, and market trends). Both require subscriptions but should be considered for deeper guidance in planning models and trends. The best practice for NDE to follow at this time is to adhere to state requirements to establish and maintain plans in accordance with their policies and standards.

2. Technical support improvement targets:

- Use **FreshService reporting** to identify issue types and frequencies and reduce them through work procedures and training. Currently the IT team does not generate support ticket statistics out of the FreshService help desk reporting system, although they do require users to submit their help requests through it. Following the improvement in response time, identifying frequent issues and mitigating them through procedures or training can help shift technical support time toward work on higher priority tasks in the action plan.
- Create a **prioritized list of procedures** for office staff, making no assumptions about what they are able or unable to do. An interesting set of conflicting findings through interviews reveals that management believes there is a shortage of procedures – in fact they state that policies and desk procedures are either outdated or non-existent. At the same time, the IT staff believe they spend most of their technical support time resolving issues resulting from staff not following procedures. Although with mainly positive results, the survey revealed the main area in which staff could use assistance is with more training (15% of respondents). Several comments express the need for more Smartsheet training; training to explain the differences between OneDrive, SharePoint, Teams, etc.; and consistent training with options for those with more or less technical aptitude. Starting with the staff survey results followed by a simple needs assessment and planning, IT can identify and prioritize gap training and procedures and build them into the action plan. The **CANVAS Onboarding** training is a good example to follow for planning

¹⁰⁶ <https://www.doe.virginia.gov/teaching-learning-assessment/k-12-standards-instruction/digital-learning-integration/technology-in-education/educational-technology-planning>, 2024.

purposes, as it provides in detail steps new staff must follow to quickly become integrated into productive work.

- **Expand the use of Smartsheet** to provide status updates to IT on technology related projects outside of their purview. For example, the NDE website was outsourced as OIT does not provide that service internally. Although the Smartsheet RTI process made IT aware of the project, scheduled progress updates could have helped to head off certain technical issues before they grew into something less manageable such as issues related to hosting, broken LEA links, clean-up, maintenance, and support.
- Provide **backup support** in cases where the first line of support becomes unavailable from calling in sick, e.g. This kind of backup support requires planning and scheduling and should become part of a regular annual planning cycle.
- It was reported that federally funded COVID equipment does not have a **budget for refreshment**. An action plan should be included to account for how this equipment will be managed when it reaches end of life. The major IT related issue raised in the staff survey is the need to upgrade hardware and devices (e.g., tablets for the field) for staff to be more effective in their work.
- The CANVAS **onboarding** course describes how it may take up to two weeks for new employees to gain access to their NEATS account. The course goes further to say, *"Please note the HR Help Desk does not contact new users when their account is set up. You can call the HR Help Desk at (775) 687-9099 or toll-free at (866) 686-3287 or email them at hrhelpdesk@admin.nv.gov to obtain your Employee ID number, verify your account has been established, and/or receive your login credentials."* Although outside the control of NDE OIT, this should be an automated process that notifies new employees when their account is ready.

3. **Strategically provide professional development opportunities for staff.** IT staff shared through interviews their interest in receiving professional development opportunities to expand their knowledge and to serve the needs of NDE in a wider capacity. If strategically planned, staff can be trained and engaged in new and meaningful work while remaining within their job classifications. Impacted positions span the BPA-II & III and ITP-II & III job classes, with excerpts from those descriptions as follows to illustrate how training and new job assignments can fit within each class:

State of Nevada Job Class Specification Excerpts:

BPA-II: principles, practices and procedures required to develop, design, and implement information system-based solutions in a wide range of problem domains; writing concise, logical, grammatically correct analytical reports.

BPA-I: General knowledge of principles, practices, and procedures required for designing and implementing information systems-based solutions; a variety of end-user tools and applications; sources of information and research techniques; problem-solving methods.

ITP-III: Detailed knowledge of basic elements of programming in order to generate all required reports and special projects as required of the data processing section; computer operating system including all functions, schedules, workflows, and processes; must have the ability to program in a general-purpose programming language, develop written requirements for proposed applications, develop and present applications training materials to users, and possess knowledge of the necessary interfaces to the computer operating system; programming prototype and implementable applications as assigned; and developing, implementing, coding, testing, and documenting multiple

program segments written in a general purpose programming language; basic elements of programming in order to generate all required reports and special projects as required of the data processing section.

Professional development topics for consideration to align technology with immediate business needs in line with current job classifications in the DSM team are as follows:

- **Data collection apps.** As examples, these can be web-based apps or special VBScript or VBA applications to convert spreadsheet information into a format for programmatic data exchange. Having capacity within NDE to support web-based apps will be useful not only for data collection, but other reasons like small scale website development and maintenance. If NDE does not have an interest in developing websites internally, the skillset to understand and maintain them can be useful.
- **Data dashboards / visualizations.** NDE outsources dashboard development as capacity in-house is limited. OIT has staff on the DSM team with the skills needed for dashboard development using Tableau, PowerBI, and SQL Server Reporting Services (SSRS), but their responsibilities are divided among other areas including database administration and application development. Since dashboards and visualizations fall under the category of report development and reporting, planning for creating additional capacity in-house can increase efficiency by reducing reliance on external contractors to build and maintain them. NDE has outsourced the development of many data dashboards including as examples: IC KPI's, Portrait of a Learner, Class Size, overall Teacher/Student Ratios, and Teacher Certification. Others including a SID dashboard, and CTE dashboard, and a Washoe Dashboard were mentioned to team members throughout the study. Dashboards are powerful visualization tools that everyone should have, but some of these are reactions to isolated events and are not tied to any strategic data/business plan. For example, a safety event occurred in Washoe County School District (WCSD) where some parents kept their students at home. In response, WCSD developed a dashboard involving daily attendance that, in turn, triggered NDE to develop something similar. But NDE doesn't pull daily attendance – that data only exists at the district level. In that context, NDE should consider the following related to dashboards:
 - Pause or put a moratorium on new dashboard development until the following are in place:
 - Data strategy aligned to a business strategy.
 - DMS reporting requirements including data dashboards are known. What dashboards will be developed as part of the DMS?
 - Technology action plan addressing internal dashboard development.
 - Bring more data dashboard development in-house through professional development.
- **Certified Data Management Professional (CDMP).** NDE is equipped with staff who currently hold or previously held *Project Management Professional (PMP)* certifications based on the *Project Management Body of Knowledge (PMBOK)* guide for project management. As a best practice, NDE could further benefit by having staff trained or certified with the data management equivalent of the PMP known as the CDMP, which is based on the DMBOK. This certification essentially signifies expertise in data management practices similar to how PMP demonstrates project management proficiency.
- **Website development and maintenance.** Modern tools like WordPress and Wix have made it easier for non-technical businesses to develop and host their own websites for the cost of a

monthly subscription. The complexities associated with hosting including web and application servers, domain name services, and security are managed by the host – IT teams are no longer required to manage them. With the likely need to develop web-based data collection apps, it could also serve to NDE’s advantage to have the skillset in-house and then extend the benefits to a future website design. This is not a recommendation, only a consideration as there are distinct tradeoffs for internal web development that appear to weigh in NDE’s favor. The tradeoffs between outsourcing and internal web development are summarized in **Exhibit 6-18**, with those weighed in NDE’s favor highlighted in **blue text**:

EXHIBIT 6-18

TRADEOFFS IN OUTSOURCING VS. INTERNAL DEVELOPMENT OF WEBSITES OR WEB APPS

Factor	Outsourcing	Internal Development
Cost	Lower upfront costs, but recurring costs may add up.	Higher initial investment in professional development and/or staffing, but potentially lower long-term costs.
Expertise	Access to specialized skills but may come at a premium.	May require hiring or training for necessary skills, but can work in tandem with the State web development team to bridge any gaps.
Time to first publication	Faster turnaround and delivery.	May take longer depending on priorities.
Control and Customization	Less control; reliant on external workflows and	Full control over design, features, and functionality.
Maintenance	Ongoing support available but dependent on vendor.	Fixes or changes are immediate.
Scalability (referring to adding new content – hosting scalability issues)	Flexible, but changes/additions come with a cost depending on the vendor contract.	Full control over new content additions.
Data security	Relies on vendor practices; data sharing risks.	More control over data security and compliance.
Innovation	Up-to-date trends and tools.	May lag without continuous training or exposure.

Sources: “*The Lean Startup*” by Eric Ries; “*Agile Web Development with Rails*” by Sam Ruby; Smartsheet – [Outsourcing vs. In-House Development](#); Gartner IT Outsourcing Trends Report – Discusses outsourcing trends and frameworks; Harvard Business Review – Case studies on business process outsourcing (BPO); PMI's PMBOK Guide – For project planning and resource allocation.

The choice to develop and/or staff web-based application development internally will depend on NDE’s budget, timeline, expertise, and long-term goals. For short-term needs or specialized designs, outsourcing may be more practical. However, internal development provides greater control and scalability when planning for continuous growth and customization. Hybrid approaches, where internal teams manage ongoing updates while outsourcing specialized tasks or partnering with the State’s web team, can also balance flexibility and control. When considering including this topic in a strategic technology action plan, the hybrid approach is the recommended strategy.

- **Additional IC expertise for data requests and reporting.** This will help with data request reviews and NDE developed queries and reports. NDE currently outsources some IC development work

to LEAs as their capacity in-house is limited. **Recommendation 6-6** addresses this topic in more detail.

4. **Cloud migration:** Cloud migration involves transferring data, applications, and other business elements from on-premise infrastructure to a cloud computing environment. This process can also include moving from one cloud provider to another. The importance of cloud migration stems from the numerous benefits that cloud computing offers. First, it provides scalability, allowing organizations to easily adjust their computing resources based on demand without significant capital investment. This flexibility supports business growth and agility. Second, cloud services often result in cost savings by reducing the need for physical infrastructure, maintenance, and energy consumption. Third, cloud platforms enhance collaboration by enabling access to data and applications across geographical boundaries.
 - The OIT Ops team is in the process of consolidating systems data into a single location – although it is a long path forward, migration to the cloud is progressing: Virtual Machines (VMs) and H: drive contents have been moved, G: and P: remain to be cleaned and moved. Other systems on the migration path include Bighorn, Anlar (previously OtisEd), Nevada Report Card, and the Student Growth Model.
 - This effort should continue with the goal of migrating all data to the cloud prior to the DMS go-live. A consolidated cloud storage facility will simplify the conversion and integration of data required by the new system once the storage requirements are known.

Ensure the consolidated cloud storage data warehouse has a backup facility. OIT staff indicated that the cloud service they utilize has no backup capability, and the state had to purchase a separate backup system for this reason. Whether the backup facility is on-premise at a co-location facility or in the cloud, a reliable backup must exist.

IMPLEMENTATION STEPS:

Technology action planning should be treated as a Division-wide effort with the main goal of aligning business and IT goals and priorities. With NDE and state IT dividing responsibilities, the work should focus on NDE specific areas of responsibilities and issues, and emphasis on an action plan to address high priority areas first in a version 1.0 release. This can serve as a *micro* plan to supplement the state's *macro* level plan, with simplicity as the key to making it attainable. The plan can be revisited annually to assess progress and reevaluate priorities for versions 2.0+.

1. Form an internal technology action plan committee comprised of IT and business representatives.
2. Identify and prioritize topics to be covered in version 1.0 of the plan – these should be the most pressing issues needing immediate attention and those that need to be in place for upcoming major initiatives.
3. Define tasks and set timelines, assigning responsibilities to committee members. Meet periodically to track and update progress.

FISCAL IMPACT

The technology action plan can be developed internally and is cost neutral.

FINDING

There is inconsistency in the level and quality of documentation produced and maintained within the OIT department.

The OIT Ops team has a single mission – to support the operational and technical needs of the agency, including the DSM team. They have made significant progress toward improvements in asset management and customer service and have a highly capable team of dedicated staff. When it comes to documentation, the Ops team appears to operate in a manner that is less compliance driven unlike their DSM counterpart. They have developed some well-documented procedures such as the *Server Naming Convention Standard* as part of their technology standards documentation library, but this library is incomplete and separate from the standards established by the other team. In addition, as mentioned in the last recommendation, there is a perceived shortage of much-needed IT procedures for the use of technology by office staff. Conversely, the OIT DSM team has well-established documentation standards for the systems they support and follow strict rules on an annual cycle to maintain their documents.

In summary, there is a general lack of consistency among offices as to how various classes of documentation are developed and maintained, with the OIT Ops team given the most flexibility in how that is accomplished. As programs, services, and major initiatives continue to expand within NDE including the DMS, a stricter documentation standard is needed to ensure continuity of operations in a rapidly changing business environment with high staff turnover.

COMMENDATION 6-D:

NDE has highly motivated and talented teams to lead the way to exemplary documentation management and should replicate their methods and procedures throughout the Department.

Driven by federal and state reporting compliance requirements, the OIT DSM team has a well-established set of business process automation (BPA) rules for their enterprise student information systems. These are strictly maintained with all updates approved through the Infinite Campus Governance Board (ICGB), and with a yearly review cycle on all documentation including business processes and guidance information for the LEAs. Through the excellence of the DSM team, the ADAM office produces various key reporting outputs to ensure transparency and accountability in Nevada's education system. Some of these include:

- **Nevada Accountability Portal:** A user-friendly platform that allows stakeholders to engage with accountability data through customizable reports and interactive visualizations, facilitating data-driven decision-making.
- **Nevada Report Card:** An annual report mandated by state and federal laws, providing detailed information on student achievement, school ratings, graduation rates, teacher qualifications, and more, serving as a vital resource for parents and stakeholders.
- **Nevada School Performance Framework (NSPF):** A system that assesses and reports on the performance of schools across the state, offering insights into areas such as academic achievement and growth.
- **Alternative Performance Framework (APF):** Tailored for schools serving special populations, this framework evaluates performance using measures appropriate for alternative education settings.

- **Acing Accountability Reports:** District-specific reports that provide detailed data and analyses to support continuous improvement efforts within each district.
- **EDFacts Submissions:** Also based on SAIN data, comprehensive data files submitted to the U.S. Department of Education through the EDPass system, covering various aspects of education, which inform federal planning, policy, and management decisions.
- **Data Requests Management:** A structured process for handling internal and external data requests, ensuring compliance with privacy laws and timely fulfillment of data needs.

The foundation they have established will be critical to the success of the DMS project as many components of a data management framework (DMF) rely strongly on processes, procedures, business rules, and documentation. Similarly, stronger reliance on well-documented and tested processes, procedures, and support provided by the Ops team will follow when the DMS project is implemented and put into production.

RECOMMENDATION 6-5:

Strengthen the documentation of the OIT Ops team to match the consistency and quality of the DSM team and align the DMS data management framework elements to bodies of documentation being developed by other offices within NDE. The alignment will help to create consistency among standards for policies and procedures, business rules, internal controls, guidance, standards, and plans internal to the Department and statewide.

Exhibit 6-19 shows a conceptual model depicting how functional alignment along the lines of documentation can further strengthen the recommendations previously made related to the data management system, the data management framework, and the technology action plan. The map shows how the alignment of DMF elements present on the OIT side (the right side) to the documentation elements present on the SID side (the left side) can strengthen the case for a new return on investment (ROI) model for NDE based on parallel but disparate areas working in unison to fuel and report on ROI measures. A brief introduction to the Student Investment Division's (SID) Office of Division Compliance (ODC) is provided here for more background on this concept:

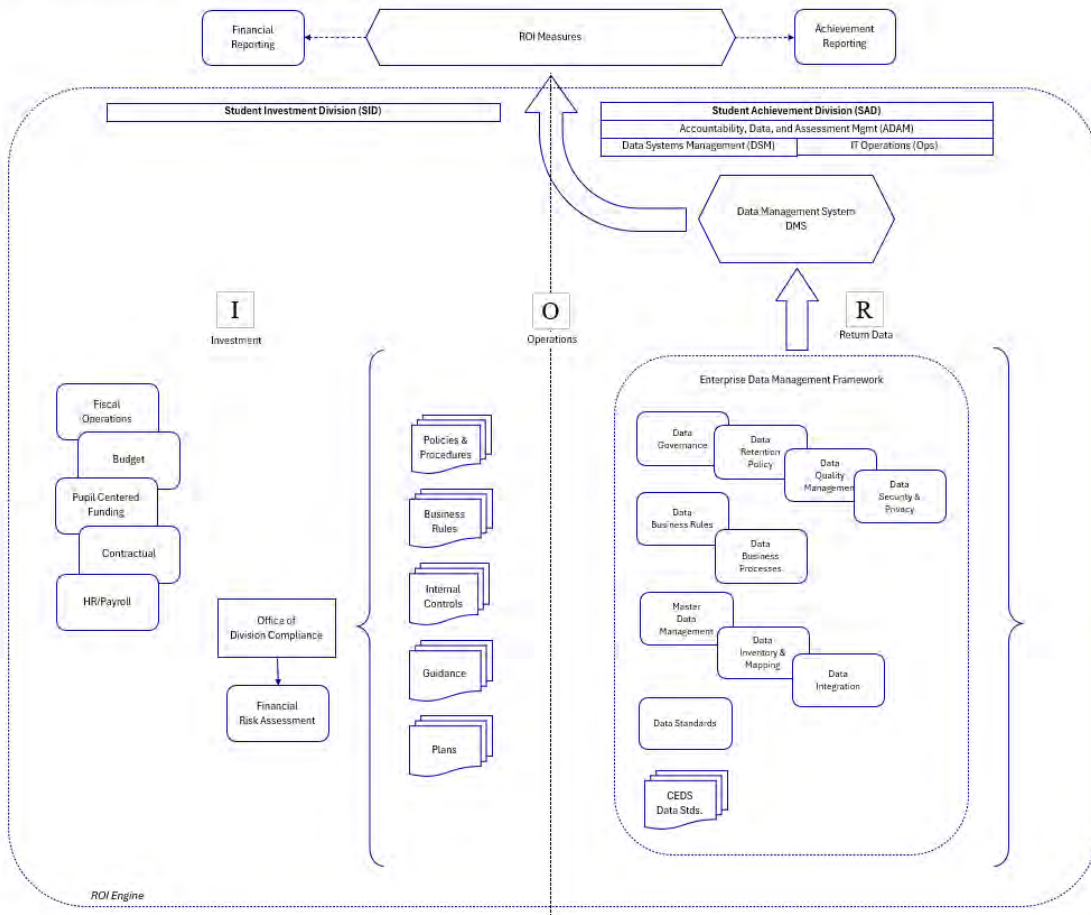
The Office of Division Compliance has two units: The *Monitoring Unit* and the *Reporting Unit*. The Monitoring Unit is responsible for the risk assessment and monitoring of all subrecipients and grant applicants, including the holistic view of the subrecipient, management of corrective actions, and technical assistance at the systemic level. The Monitoring Unit is also responsible for internal controls monitoring and assessments within Nevada Department of Education, internal accountability reporting within SID, and compliance with all state and federal statute, regulations, and best practices. The *Reporting Unit* is responsible for the development and maintenance of internal controls, rules of practice, policies and procedures, and business rules; facilitates cross-office collaboration; completes various reports including Class Size Reduction, Average Daily Enrollment and associated verifications, Interlocal Tuition Agreements, Federal Funding Accountability and Transparency Act of 2006 (FFATA), grant applications reporting, school calendars, and more.

Some of the DMF elements in OIT's domain in some ways parallel elements under ODC's domain. Although these two offices currently work independently with different objectives, when viewed through the lens of ROI, their work can strongly align with a common purpose: fueling and reporting on ROI measures.

The creation of a stronger functional alignment among OIT and ODC can be accomplished by defining and enforcing strong documentation standards for Department-wide consistency. Through such an alignment, NDE leadership can be assured that the essential components of a future data management system, data management framework, technology action plan, monitoring, compliance, and reporting can produce the highly sought visibility into the effectiveness of funds invested in Nevada’s K-12 education system.

EXHIBIT 6-19 DOCUMENTATION FUNCTIONAL ALIGNMENT CONCEPT MODEL

NDE SID/IT Functional Alignment
v0.3 Updated 2025-02-28



Source: Public Works LLC, 2024.

The ROI engine model shows investments in education programs and services through SID, with return data processed through the OIT managed DMS, followed by ROI measures providing the visibility into results. At the core of operations, documentation classes including policies and procedures, business rules, internal controls, guidance, plans, and data standards govern the inner workings that transform fiscal investments into returns in the form of data. Although not currently in the DMF portfolio, planning documents—like the Technology Action Plan and COOP—could be incorporated as an additional document class to align to the planning document class present on the SID side.

The following are best practice suggestions OIT and NDE as a whole can follow for strengthening the quality and consistency of its documentation. By implementing these best practices, NDE can create consistent, professional, and user-friendly documentation that unifies efforts, aligns with their goals, and maintains credibility not only internally, but statewide:

1. **Develop and use a standardized template.** Templates enforce uniformity in layout, formatting, and structure across all documents.
2. **Establish a style guide.** Similar to a communications guide, a documentation style guide ensures consistency in writing style, terminology, and formatting.
3. **Maintain consistent terminology.** Consistent terminology avoids confusion and ensures clear communication.
4. **Use version control.** Version control prevents conflicts and ensures everyone works on the latest version of a document.
5. **Automate formatting where possible.** Automation reduces manual errors and ensures adherence to standards. This is accomplished through document management tools (e.g., Microsoft Word styles, LaTeX) to automate headings, numbering, and captions.
6. **Implement peer reviews and audits.** Regular reviews catch inconsistencies and improve quality.
7. **Centralize documentation management.** A centralized repository ensures easy access and reduces duplication.
8. **Provide contributor training.** Educating contributors ensures adherence to documentation standards.
 - a. Offer training sessions on using templates, style guides, and tools.
 - b. Provide clear examples of well-documented materials.
 - c. Encourage feedback to improve documentation practices.
9. **Regularly update documentation.** Outdated content undermines consistency and accuracy.
 - a. Schedule regular reviews to update outdated information.
 - b. Assign ownership to maintain specific documents or sections.
 - c. Archive obsolete documents to reduce clutter.
10. **Use collaborative tools.** Collaborative tools ensure consistency during group editing and reduce redundancy.
 - a. Leverage real-time collaboration platforms like Google Docs or Microsoft Teams.
 - b. Track changes to identify edits and maintain consistency.
 - c. Assign roles for authors, editors, and reviewers.
11. **Establish document metadata.** Metadata ensures easy identification and categorization of documents.
 - a. Include metadata like creation date, author, version, and intended audience.
 - b. Use file-naming conventions for consistency (e.g., ProjectName_Version_Date).
12. **Solicit feedback from end-users.** User feedback ensures that documentation meets its intended purpose and is easy to use.

IMPLEMENTATION STEPS:

- The OIT DSM team provides leadership to guide the Ops team in creating plans to standardize and complete their documentation library.
- Similar to the DSM team, a documentation maintenance schedule is developed to review, update, and provide guidance to NDE staff on changes.
- Form a cross-functional documentation standards team to guide the alignment of document classes among OIT and SID in preparation for the DMS system implementation. The documentation standards team may develop a timeline using SmartSheet and assign responsibilities in project management fashion to make progress toward their goals.

FISCAL IMPACT

The documentation standards team is internal to NDE and is cost neutral.

FINDING

The NDE statewide implementation of Infinite Campus for student data management has stabilized with some longstanding issues that should be addressed and resolved through efforts of NDE leadership and the Infinite Campus Governance Board (ICGB).

NDE selected Infinite Campus as its statewide student information system in January 2016, aiming to enhance data management and reporting across all school districts. Prior to this statewide adoption, several Nevada school districts had already implemented Infinite Campus at the local level, starting with Washoe County School District (WCSD) in 2009 and followed by the Clark County School District (CCSD) in 2014. NDE's decision to adopt Infinite Campus statewide was influenced by the system's existing presence in over 94 percent of Nevada's student data management at that time. The statewide implementation was fully operational by mid-2017, facilitating real-time data collection and improved efficiencies for both the NDE and Nevada school districts.

Implementing a statewide student information system (SIS) is a monumental task which took Nevada eight years from WCSD's implementation to statewide implementation maturity. NDE and its LEAs are not aligned when it comes to funding and timelines, each is on its own. For example, CCSD's 10-year contract ended in 2023 and is currently on annual renewal, whereas NDE is on a recommended five-year re-solicitation schedule. NDE has extended its contract beyond the five years, and the LEAs are waiting for NDE's lead and guidance on a path forward. While the state has enjoyed the many benefits of statewide consolidation and reporting of data from like systems, the implementation has stabilized but with several longstanding issues.

First, the vendor has become complacent when it comes to listening and responding to LEA or state requests for fixes and new features, unlike when the relationship was new. With CCSD as the fifth largest public school district and Infinite Campus' largest single school district customer—and Nevada as their first statewide implementation—one would expect otherwise. CCSD is the most influential SIS voice in the state, and along with NDE's ICGB, are told their requests are “on the roadmap” for future development. In some cases, the roadmap has extended beyond two years, as with the non-traditional student report (part-timers) – which has been in the system for over two years but doesn't work. In fact, most issues submitted by the LEAs to Infinite Campus are now referred to the state for resolution.

Second, there are inconsistencies in narratives among NDE and LEA staff responsible for supporting the functions of the SIS and the many data and reporting elements produced through it.

COMMENDATION 6-E:

The state of Nevada has realized significant efficiency gains through the statewide implementation of its student information system.

The system provides for daily collection and consolidation of like data from all LEAs, making tracking and reporting of longitudinal data more accessible and reliable through stronger validation and error-checking. The statewide ICGB led by OIT provides strong governance for system functionality, data management, and reporting. NDE's Data Governance Board (DGB) also provides strong governance over data and data requests including those related to Infinite Campus.

RECOMMENDATION 6-6:

Work with the ICGB to clearly identify and document various longstanding issues with the SIS implementation, and develop a plan to resolve internal issues while working with the vendor to address the issues they own in an acceptable timeframe.

SIS data will become consolidated with data from other systems and domains within the future data management system. Various issues related to Infinite Campus have been identified throughout the course of this study and addressing them now will prevent them from being replicated into a new system of processes. The issues presented here surfaced during the course of the study and are intended as a starting point for NDE SIS leadership to fully realize the benefits of an integrated statewide system. NDE SIS leadership should work with the statewide Infinite Campus Governance Board (ICGB) to identify, document, and address them as part of a clean-up effort in preparation for the DMS implementation.

- Longstanding issues on the IC roadmap for future development remain unresolved.
- Some expertise to pull and report on data from IC is located in the Clark County School District. In some cases, NDE relies on that expertise to develop and test new functions/features before rolling them out statewide.
- If data from district instances of IC also resides in the state edition, NDE technical staff should be able to pull and report on that data.
- Some data is reported to be out of alignment, as unmatched domain data is stored in convenient locations within IC. For example: Some HR data such as licensure, staff changes (rotating subs), or teacher classroom positions are stored in the SIS.
- It was reported that CCSD is required to cover the cost for their elementary school students rostered into CANVAS through Infinite Campus, although they were told by NDE 50 percent of that cost would be state-funded. This issue needs to be researched as the cost impact to CCSD is \$300,000 annually.

The general consensus among the schools and staff interviewed is that NDE is requesting excessive amounts of data, in some cases the requests are redundant, or the requests are for data that NDE has access to from other sources. NDE should designate either one data steward or a member of the technical staff as an IC data exchange liaison to LEAs to help prevent unnecessary or redundant data requests, and to ensure that multiple NDE departments are not asking for the same or similar data.

With regards to longstanding issues on the vendor development roadmap, NDE has options to consider to ensure the needs of districts and schools are being met.

Nevada Revised Statutes (NRS) 385A.070 provides instructions for the program and annual reports of accountability for school districts and certain charter schools. Per NRS 385A.70.2, *“The board of trustees of each school district shall, on or before December 31 of each year, prepare the immediately preceding school year a single annual report of accountability concerning the educational goals and objectives of the school district, the information prescribed by NRS 385A.070 to 385A.320, inclusive, and such other information as is directed by the Superintendent of Public Instruction.”* OIT leadership emphasizes that the Nevada Superintendent of Public Instruction holds the power under NRS to determine the system(s) used to meet these requirements. Furthermore, the state of Nevada's procurement policies, as outlined in NRS Chapter 333, do not specify a mandatory requirement for agencies to issue a Request for Proposal (RFP) periodically, but the State Contracting Policies and Procedures emphasize the importance of regular re-solicitation to ensure competitive pricing and compliance with state regulations. Following are some key considerations:

- Data governance training for offices and data stewards on system development and the use of SIS data can help to resolve issues stemming from data needs and capacity/capability limitations among NDE and the LEAs, ensuring data/system needs are processed through the proper channels.
- NDE working in collaboration with the ICGB can determine what is and what is not working with regards to the current SIS vendor. When a vendor is non-responsive, or cannot or will not provide reasonable assurance that Nevada's needs will be met, other options can be considered:
 - Regular Review: Agencies should regularly review existing contracts and assess the need for re-solicitation based on factors such as market conditions, vendor performance, and changes in requirements.
 - Requests for Information (RFI): Agencies can issue an RFI to determine changes in the SIS market and potential opportunities for better solutions.
 - Requests for Proposal (RFP): While the State Superintendent of Public Instruction has express authority over SIS systems statewide, and there is no explicit five-year RFP requirement, consideration for re-solicitation sends a strong message that vendor inaction or complacency will not be tolerated.

Disruptive innovation, a concept introduced by Clayton Christensen in his landmark book *Disrupting Class*, refers to the process by which a new product, service, or technology transforms an existing market by offering simpler, cheaper, or more accessible solutions. Disruptive innovation does occur – and usually when companies are blind to the changes occurring around them and locked into a belief that change is not needed. Several of the most important factors that contribute to disruptive innovation are at play in the state of Nevada: (1) emerging technologies, where advances in technologies like artificial intelligence, blockchain, and cloud computing enable the creation of new solutions; (2) market gaps and unmet needs, where disruptive innovations often address underserved or overlooked customer segments or needs; and (3) customer-centric design, where disruptors often prioritize customer needs and user experiences over legacy practices; and with over 30 years in the making, Infinite Campus today can be considered a legacy system.

In NDE's case, the thought of replacing a statewide SIS that has taken nearly a decade to stabilize can be overwhelming and cost prohibitive, but those seemingly formidable barriers could very well be the

leverage a vendor uses to keep their customer's needs and requests "on the roadmap", with no intention of ever fulfilling them. By recognizing that disruptors exist, and with a statewide SIS as a new standard to build upon, exploring new innovations and opportunities can at least help NDE keep an open mind about the future of SIS computing in the state.

IMPLEMENTATION STEPS:

- Work through the ICGB monthly meetings to develop a plan to engage the issues. A timeline should be developed and coordinated with the DMS implementation timeline.
- Engage the vendor with a list of expectations and timelines, and work to secure commitments to fulfilling longstanding requests.
- Execute the plan with strong communication to LEAs on progress.

FISCAL IMPACT

The ICGB is internal to the state of Nevada and working through them is cost neutral.

APPENDIX A: PEER STATE REPORT FOR THE NEVADA DEPARTMENT OF EDUCATION

INTRODUCTION

The Nevada Department of Education, in conjunction with Public Works LLC, identified five states to analyze in comparison with Nevada. They are Arkansas, Kentucky, Oregon, Tennessee, and Utah. Multiple criteria were used to identify the comparison states: Oregon and Utah for geographic proximity, Arkansas, Kentucky, and Tennessee for similar demographics and size of school population.

Data for the peer state analysis come primarily from the National Center for Education Statistics (NCES), Nevada Department of Education (NDE), Arkansas Department of Education (ADE), Kentucky Department of Education (KDE), Oregon Department of Education (ODE), Tennessee Department of Education (TDE), and Utah State Board of Education (UBE) as well as the U.S. Census Bureau, U.S. Bureau of Economic Analysis (BEA) – Regional Price Parities, and National Center for Health Statistics.

The report is provided in two major sections: State Department of Education Data and State Education Data.

State Department of Education Data

Number of Employees: Students Per Employee
 Number of Employees Per School
 Number of Employees Per School District
 Department of Education Staffing
 Department of Education Salaries
 Salary Comparisons by Position
 State Employee Benefits
 State Department Organization Charts

State Education Data

Section A: Basic Information

Number of School Districts, Public Schools, Charter Schools 2013-14 to 2022-23
 Number of public elementary and secondary schools by enrollment size of school 2021-22
 Enrollment 1990 to 2022
 Enrollment: 2018-19 to 2022-23
 Projected Enrollment 2022 to 2031
 Percent Enrollment by Race/Ethnicity 2022-23
 Percent of Students with Disabilities 2018-19 to 2022-23
 Percent of English Language Learners 2018-19 to 2022-23

Section B: School District Staffing Information

Teacher Salaries 2019 in 2022 constant dollars
 Pupil - Teacher Ratio 2018-19 to 2022-23
 Pupils Per Full-Time Equivalent (FTE) Staff 2018-19 to 2022-23

Pupils Per Paraprofessional/Instructional Aide 2018-19 2022-23
Pupils Per Instructional Coordinator 2018-19 to 2022-23
Pupils Per School Counselor 2018-19 2022-23
Pupils Per Librarian/Media Specialist 2018-19 to 22-23
Pupils Per Student Support Services Staff 2018-19 to 2022-23
Pupils Per LEA Administrators 2018-19 to 2022-23
Pupils Per School Administrators 2018-19 to 2022-23
Number of Teachers & as a Percent of All School Staff 2022

Section C: National Assessment of Educational Progress (NAEP)

NAEP Math / Reading Grade 4 All Students 2019 to 2022
NAEP Math / Reading Grade 4 Eligible National School Lunch Program 2019 to 2022
NAEP Math / Reading Grade 4 English Language Learners 2019 to 2022
NAEP Math / Reading Grade 4: Students with Disabilities 2019 to 2022
NAEP Math / Reading Grade 8: All Students 2019 to 2022
NAEP Math / Reading Grade 8: Eligible National School Lunch Program 2019 to 2022
NAEP Math / Reading Grade 8: Students with Disabilities 2019 to 2022
NAEP Math / Reading Grade 8: English Language Learners 2019 to 2022
NAEP Reading Grade 4: Race / Ethnicity 2019 to 2022
NAEP Math Grade 4: Race / Ethnicity 2019 to 2022
NAEP Reading Grade 8: Race / Ethnicity 2019 to 2022
NAEP Math Grade 8: Race / Ethnicity 2019 to 2022

Section D: Finance

Per Pupil Total Revenues 2018-19 to 2022-23
Per Pupil Local Revenues 2018-19 to 2022-23
Per Pupil State Revenues 2018-19 to 2022-23
Per Pupil Federal Revenues 2018-19 to 2022-23
Per Pupil Total Expenditures 2018-19 to 2022-23
Per Pupil Instructional Expenditures 2018-19 to 2022-23
Per Pupil Support Services Expenditures 2018-19 to 2022-23
Per Pupil Non-Instructional Expenditures 2018-19 to 2022-23
Per Pupil Total Salary Expenditures 2018-19 to 2022-23
Per Pupil Employee Benefits Expenditures 2018-19 to 2022-23
Per Pupil Purchased Services Expenditures 2018-19 to 22-23
Per Pupil Supply Expenditures 2018-19 to 2022-23
Per Pupil Total Expenditures 2018-19 to 2022-23
Per Pupil Expenditures for Public El-Sec Only 2018-19 to 2022-23
Per Pupil Facilities Acquisition / Construction Expenditure 2018-19 to 2022-23
Per Pupil Replacement Equipment Expenditures 2018-19 to 2022-23

Section E: Context for Comparison Data

High School Graduation Rate / Adults with Bachelor's Degree or Higher
Cost of Living Summary
Health Outcomes for Longevity, Adult Health and Children's Health

HIGHLIGHTS

Department of Education Comparison

Nevada's Department of Education (NDE) faces significant staffing and compensation challenges compared to other states, impacting its efficiency and competitiveness. With only 197 employees, NDE has the highest students-per-employee ratio (2,458) among the states analyzed, nearly double Utah's (1,573) and significantly higher than Oregon's (781). This lean staffing model translates into an overwhelming workload per employee, affecting service quality and increasing the risk of burnout.

Additionally, Nevada's salaries, both nominal and cost-of-living-adjusted, are among the lowest. Leadership roles such as Deputy Superintendent and Superintendent earn 100-175 percent less than their counterparts in Tennessee, Arkansas, and Oregon. Specialized positions like Audit Manager and Public Information Officer also see disparities of 20-142 percent. Entry-level administrative and IT positions offer slightly more competitive salaries but still lag significantly behind most states.

Nevada also has the highest schools-per-employee ratio (3.8), further emphasizing resource constraints. These gaps hinder recruitment, retention, and the department's ability to meet educational needs effectively. To improve, Nevada must strategically increase staffing and align salaries with cost-of-living standards, ensuring fair workloads and a more competitive edge in attracting talent. Addressing these disparities is critical for improving educational outcomes statewide.

State-paid benefits are similar across states, covering healthcare, retirement, life insurance, and paid leave, but Nevada's high student-to-staff ratio suggests a need for increased staffing to alleviate workloads and enhance service quality. Addressing these gaps could involve state funding increases to improve the department's capacity and educational support.

Basic Information

Between 2013-14 and 2022-23, Nevada experienced a sharp increase in its educational infrastructure, particularly in charter schools, expanding from 41 to 101. In contrast, Kentucky reported no charter schools. This growth aligns with Nevada's rapidly expanding population and school choice initiatives.

Regarding school sizes, Nevada has a higher percentage of both very small (under 200 students) and very large (1,500+ students) schools compared to other states, while mid-range schools (200-599 students) are less common.

Enrollment trends show that Nevada had the highest growth from 1990 to 2022 at 141 percent, reflecting its fast population increase. The COVID-19 pandemic caused a 1.7 percent decline in student enrollment from 2018-19 to 2022-23 in Nevada, less severe than the 9.4 percent drop in Oregon.

Projected to 2031, Nevada's enrollment is expected to decline by 2 percent, stabilizing after years of growth. The state also has a more diverse student population, with 44.1 percent Hispanic and 5.5 percent Asian students in 2022-23, unlike predominantly White states like Kentucky.

In recent years, the percentage of students with disabilities in Nevada increased by 0.9 percent from 2018-19 to 2022-23. English Language Learners (ELL) in Nevada are the highest among the states at 17.2 percent, showing modest growth of 0.4 percent during the same period.

Staffing Information – Schools & Districts

Between 2018-19 and 2022-23, Nevada's pupil-teacher ratio decreased slightly from 21.2 to 21.0, remaining one of the highest among the states, and showing only a minimal reduction compared to an average 5.12 percent decrease in other states. Despite this, Nevada saw a significant 44.5 percent drop in pupils per full-time equivalent (FTE) staff, indicating efforts to hire more staff and improve support, though its ratio still remains higher than most states.

Nevada made notable progress in reducing the number of pupils per paraprofessional, instructional coordinator, and librarian, with a dramatic 29.1 percent, 69.7 percent, and 31.1 percent decreases respectively. However, it still maintains higher ratios compared to Oregon and Arkansas, suggesting more efforts are needed to match national averages.

In terms of pupils per school counselor, Nevada reduced its ratio by 15.2 percent, yet it remains higher than several states. Its improvement in students per school administrator was the most significant at a 27.2 percent decrease, though the state still has a relatively high ratio.

Despite a concerning 27.1 percent increase in pupils per LEA administrator, suggesting growing administrative pressures, Nevada ranks relatively high in terms of the proportion of teachers within its school staff at 48.3 percent.

Student Achievement – National Assessment of Educational Progress

From 2019 to 2022, Nevada's NAEP results showed mixed performance across various student demographics and subjects.

Grade 4:

- All Students: Nevada experienced a 6 point decline in both Math and Reading, aligning with national declines but particularly concerning in Reading. In contrast, Utah showed resilience with smaller drops, while Oregon faced the steepest declines.
- Eligible for Free/Reduced Lunch: Nevada's declines were relatively modest at 4 points in Math and 3 points in Reading, faring better than most states. Oregon uniquely improved in this category.
- English Language Learners (ELLs): Nevada's ELLs saw a 6 point decline in both Math and Reading, performing better than Arkansas but not as well as Kentucky and Tennessee, which showed improvements.
- Students with Disabilities: Nevada held steady in Math (0-point change) but saw a moderate 3 point drop in Reading.

Grade 8:

- All Students: Nevada showed a 5 point decline in Math but was notable for a 1 point improvement in Reading, diverging from the national trend of declines.

- Eligible for Free/Reduced Lunch: Nevada recorded a rare gain, with a 1 point increase in Math and a significant 6 point improvement in Reading, the highest among states.
- Students with Disabilities: Nevada saw a 1 point gain in Math and a 5 point improvement in Reading, indicating effective support strategies.
- English Language Learners (ELLs): Nevada's moderate declines were less severe than Tennessee's but still indicate challenges.

By Race/Ethnicity:

- Grade 4 & 8 Reading and Math: Most demographic groups experienced declines, except for Asian/Pacific Islander students in Grade 4 Reading, who showed improvement. Notably, Nevada saw declines among Black, Hispanic, and White students, mirroring broader national trends.

These results suggest that Nevada faced challenges in maintaining academic performance, particularly in literacy and among various demographic groups, but also achieved notable resilience and improvements in certain areas, particularly among students with disabilities and low-income students.

Finance

From 2018-19 to 2022-23, Nevada's growth in per pupil total revenue was the smallest among six states, increasing by just 7 percent from \$11,194 to \$12,024. In comparison, Oregon had the highest growth at 22 percent, reaching \$17,857, reflecting a robust investment in education.

Nevada's local revenue per pupil increased modestly by 3 percent, maintaining one of the highest local revenue levels second only to Oregon. State revenue also saw a modest 5 percent increase, significantly lower than Oregon's 28 percent rise, indicating a greater reliance on local sources.

Federal revenue per pupil in Nevada grew by 42 percent, a substantial increase but still lower compared to Arkansas's 64% growth. Despite this increase, Nevada's overall federal funding remains moderate.

In terms of expenditures, Nevada's total per pupil expenditures grew by 8 percent to \$10,034, surpassing Arkansas and Tennessee but lagging Oregon's significant 18 percent increase. Nevada's instructional expenditures rose by 14 percent, showing a strong focus on direct classroom investment.

Support services expenditures grew modestly by 3 percent, the smallest increase among the states, while non-instructional expenditures declined by 21 percent, indicating a cutback on operational costs. Employee benefits and salary expenditures increased by 12 percent and 9 percent respectively, reflecting moderate growth in staff compensation.

Nevada reduced spending on facilities acquisition and replacement equipment by 13 percent and 11 percent, respectively, in contrast to Tennessee, which saw substantial increases. This suggests a strategic reallocation of resources, potentially impacting long-term infrastructure and equipment updates.

Context for Comparison Data

Nevada's high school graduation rate for the 2021-22 year is 82 percent, which is lower than all comparison states except Oregon (81%). Despite this, Nevada outperforms Arkansas (24.3%) and

Kentucky (24.5%) in residents with a bachelor's degree or higher, with 27.5 percent. However, Nevada still trails behind Oregon (34.0%) and Utah (33.9%) in higher education attainment, indicating a divergence between its high school and higher education outcomes.

In terms of cost of living, Nevada's index is 108.5, higher than Arkansas (85.9), Kentucky (88.9), and Tennessee (88.9). Its housing costs are notably high, aligning with Utah's similar cost of living index (108.4). Despite these higher costs, Nevada's healthcare expenses are average compared to Oregon's high costs.

Regarding health metrics, Nevada's life expectancy of 79.3 years is higher than Arkansas, Kentucky, and Tennessee, but lower than Oregon (79.9 years) and Utah (80.2 years). Although Nevada has moderate rates of chronic conditions and struggles with healthcare access for children, it generally fares better in health outcomes than Arkansas, Kentucky, and Tennessee.

Data Caveats

- Public education data often lags due to collection and validation processes. Trends may have shifted since the data was published. This report provides the most recent data that is available.
- Even though NCES is rigorous in its data standards, differences in how states or districts report information can affect comparability and may explain apparent discrepancies.
- NCES defines local revenue for public school districts as funds originating from local sources, primarily property taxes, other local revenue, and fees.
- Staffing levels are influenced by funding availability, union contracts, and local priorities.
- NCES calculates per pupil revenue for states in the U.S. by dividing the total revenue all school districts in the state receive by the state's total enrollment.
- Student demographics (e.g., poverty, language barriers, special education needs) affect enrollment, staffing, and finance decisions.
- Even though the comparison states have similar demographics, some states face higher costs or challenges due to the needs of their student populations.
- Policy shifts often drive significant changes in enrollment, staffing, and finances.
- Calculations in the following exhibits are based on full-precision numbers; rounded values displayed may not calculate exactly.

STATE DEPARTMENT OF EDUCATION DATA

Departments of Education: Number of Employees

Exhibit A-1 provides a comparison of the number of employees for NDE and the comparison departments of education as well as the ratio of state-wide students to the number of department employees. In this comparison of the staffing in various state departments of education, Nevada stands out with the highest students per employee ratio. The implications of this staffing level for Nevada include the following:

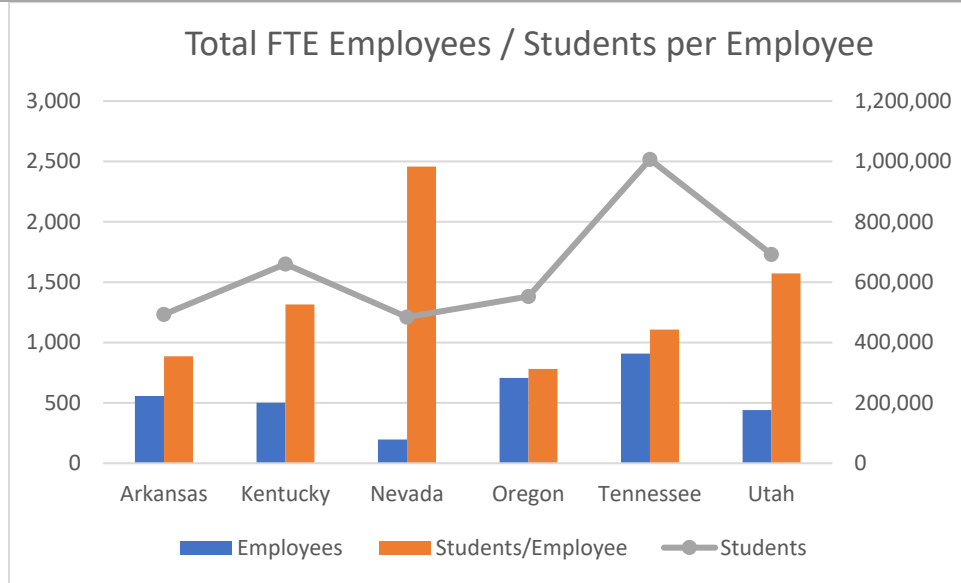
- Lowest Number of Employees:

- Nevada has 197 full-time equivalent (FTE) employees, significantly lower than other states with similar or slightly larger student populations (e.g., Oregon and Utah).
- This low number of employees indicates limited staffing resources in NDE, which impacts the department's ability to provide adequate support, oversight, and direct services.
- High Students per Employee Ratio:
 - Nevada has a ratio of 2,458 students per employee, the highest in the peer group by a substantial margin. In comparison:
 - Utah has the next highest ratio at 1,573 students per employee.
 - Oregon has one of the lowest ratios, with only 781 students per employee.
 - This high ratio suggests a potentially overwhelming workload for each NDE employee, which can lead to decreased efficiency and the risk of burnout.
- Comparative Analysis with Other States:
 - Tennessee serves over 1 million students with 909 employees, yielding a much lower student-to-employee ratio of 1,108. This allows for more resources and support per student.
 - Arkansas and Oregon both have relatively low ratios (885 and 781 students per employee, respectively), indicating a more balanced workload for their staff.
- Specific Implications for Nevada:
 - Resource Constraints: Nevada's limited staffing affects the capacity to offer comprehensive services, support programs, and respond effectively to educational needs at the state level. This constraint impacts the quality of oversight, policy implementation, and support provided to local school districts.
 - Need for Strategic Investments: NDE should consider increasing the number of FTE positions to bring the student-to-employee ratio closer to that of other states. This would improve service quality, administrative responsiveness, and support for schools and students.
 - Risk of Lower Performance and Employee Turnover: With such a high student-to-employee ratio, Nevada's employees may face higher levels of stress and job dissatisfaction, potentially leading to turnover. Retaining qualified staff is challenging without additional support and reasonable workload distribution.
- Policy Considerations:
 - The data suggests Nevada should reevaluate its staffing model within the Department of Education. Increasing staffing levels would help the department better serve its student population and support educational outcomes more effectively.
 - NDE's high student-to-employee ratio can be used as a basis to advocate for increased state funding or restructuring within the department to improve operational efficiency.

Conclusion: NDE faces significant challenges due to low staffing levels relative to student numbers, which could hinder its effectiveness. Addressing these issues should involve increasing FTE staffing to better align with the needs of the student population, thus improving the department's capacity to support schools and implement educational policies effectively.

EXHIBIT A-1
TOTAL FTE EMPLOYEES / STUDENTS PER EMPLOYEE

State	Employees	Students/Employee	Students
Arkansas	557	885	493,130
Kentucky	502	1,315	660,029
Nevada	197	2,458	484,192
Oregon	707	781	552,380
Tennessee	909	1,108	1,006,752
Utah	440	1,573	691,906



Sources: NDE & the Departments of Education for Arkansas, Kentucky, Oregon, Tennessee, and Utah 2024.

Number of Employees Per School

Exhibit A-2 shows the comparison of the state department of education employees to the number of schools that each department serves. Based on the data, Nevada has the highest "Schools per Employee" ratio among the states listed, with 3.8 schools per employee. The key observations include:

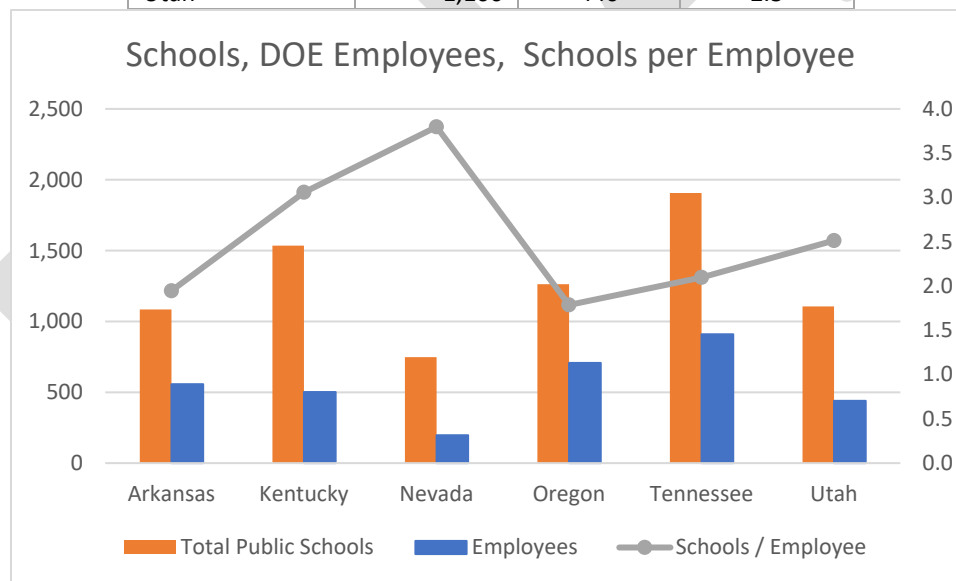
- **Efficiency:**
 - NDE operates with fewer employees (3.8) relative to the number of schools compared to the other states.
 - The next closest is Kentucky with 3.1 schools per employee, followed by Utah at 2.5 schools per employee.
 - Arkansas, Oregon, and Tennessee have significantly lower ratios, ranging from 1.8 to 2.1 schools per employee.
 - States with lower ratios (like Oregon at 1.8 or Arkansas at 1.9) suggest they have more DOE staff dedicated to supporting fewer schools, indicating more administrative resources per school.
- **Number of Employees:**

- Nevada has the smallest number of DOE employees at 197, reflecting its high ratio.
- By contrast, Tennessee employs the most staff (909 employees) but has only 2.1 schools per employee.
- Number of Schools:
 - Nevada has the fewest schools (748), which could partially explain the smaller DOE workforce. However, the schools-to-employee ratio still indicates a leaner operation compared to states with a similar number of schools (e.g., Arkansas with 1,084 schools and 557 employees).

NDE stands out for its high number of schools-per-employee ratio, suggesting an under-resourced staffing structure compared to other states.

EXHIBIT A-2
SCHOOLS, DOE EMPLOYEES, SCHOOLS PER EMPLOYEE

State	Total Public Schools	Employees	Schools / Employee
Arkansas	1,084	557	1.9
Kentucky	1,535	502	3.1
Nevada	748	197	3.8
Oregon	1,263	707	1.8
Tennessee	1,906	909	2.1
Utah	1,106	440	2.5



Source: NCES, NDE, and the Departments of Education for Arkansas, Kentucky, Oregon, and Tennessee, 2024.

Department of Education Employees Per School District

A final data point to illustrate NDE staffing levels compared to other states is the number of districts served. When comparing the number of state department of education employees to the number of school districts served, states with similar numbers of school districts were selected for several reasons:

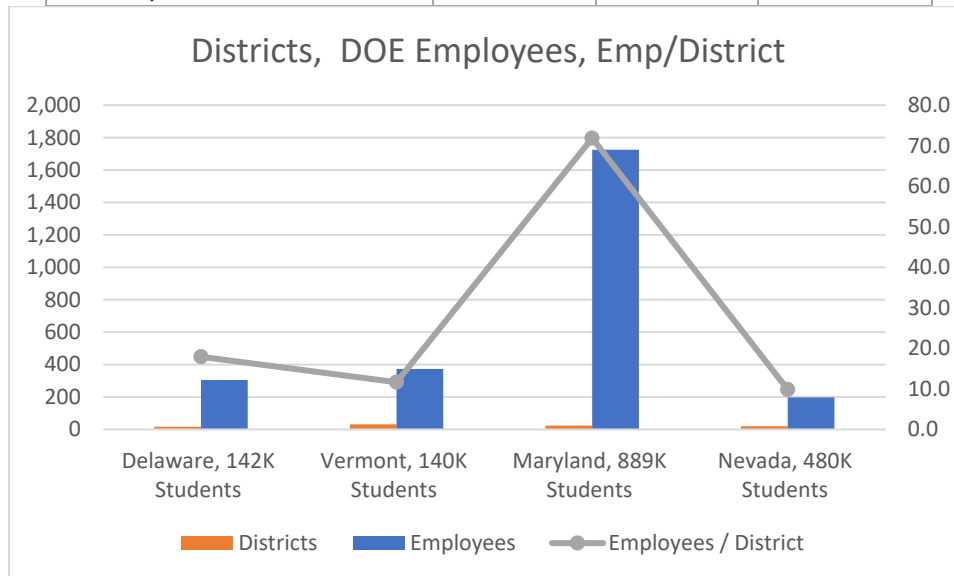
- By comparing states with similar numbers of districts, the analysis focuses on differences in efficiency, staffing models, and resource allocation strategies rather than on differences in scale.
- To understand the efficiency or effectiveness of staffing, states must be analyzed within a comparable context.
- If states with vastly different numbers of districts are compared, differences in staffing may be attributed incorrectly to inefficiency or overstaffing rather than to the realities of managing a larger or smaller number of districts.
- By selecting states with similar numbers of school districts, comparisons focus on differences in staffing strategies, resource allocation, and administrative efficiency, rather than being skewed by differences in workload size or operational scale.

Exhibit A-3 shows the comparison of department of education staffing to the number of districts rather than the number of students or the number of schools. Three states with similar numbers of school districts were selected: Delaware, Vermont, and Maryland. Key observations include:

- **Employees per District:**
 - Nevada has the lowest ratio of employees per district at 9.9.
 - Delaware has 17.9 employees per district, almost double Nevada's ratio.
 - Vermont has 11.7 employees per district, which is slightly higher than Nevada.
 - Maryland has the highest ratio with 71.9 employees per district, significantly exceeding all other comparison states.
- **Efficiency and Resource Allocation:** Nevada's low employees-per-district ratio suggests a highly lean administrative structure. This could indicate potential under-resourcing if administrative tasks are not being adequately supported.
- **Comparison to Similar States:** Delaware and Vermont, which serve fewer students but have similar numbers of districts, employ significantly more staff per district, suggesting a different administrative approach or higher investment in DOE personnel.
- **Maryland's Exceptionally High Ratio:** Maryland's staffing is disproportionately higher, reflecting either centralized administrative responsibilities, the larger student population, or unique policy and structural differences.

EXHIBIT A-3
DISTRICTS, EMPLOYEES, AND EMPLOYEES PER DISTRICT

State/Total # of Students	Districts	Employees	Employees / District
Delaware/142K Students	17	305	17.9
Vermont/140K Students	32	373	11.7
Maryland/889K Students	24	1,725	71.9
Nevada/480K Students	20	197	9.9



Source: NCES, NDE, and the Departments of Education for Delaware, Vermont, and Maryland, 2024.

Comparison of Departments and Divisions

The charts below (**Exhibits A-4 to A-8**) provide a comparison and analysis of the department / division level structures for Nevada and each of the peer state departments of education (Kentucky's information was not provided). The staffing structures of state departments of education reflect their educational priorities, budgetary capacities, and administrative approaches. Comparing Nevada's staffing to Arkansas, Oregon, Tennessee, and Utah highlights differences in organizational focus, resource allocation, and functional coverage.

NEVADA DEPARTMENT OF EDUCATION OVERVIEW

Nevada's Department of Education (NDE) operates with approximately 200 full-time equivalent (FTE) positions distributed across critical areas such as educator licensure, student support, fiscal operations, and data management. Key staffing observations include:

- **Concentration of Staff in Educator Licensure and Student Support:** The Educator Licensure division has 20 FTEs, reflecting the importance of ensuring qualified educators.
- **Streamlined Functions:** Several divisions, such as Career Readiness, Adult Learning, and Educational Options, operate with minimal staffing (4–15 FTEs), potentially indicating narrower scopes or efficiency-driven models.

- Focus on Student Investment: Significant resources are allocated to District Support Services (23 FTEs) and Student School Support (25 FTEs), demonstrating a focus on district-level impact.

ARKANSAS DEPARTMENT OF EDUCATION

- Arkansas employs over 500 FTEs, significantly more than Nevada. Key differences include:
 - Broader Staffing in Special Education and Early Childhood: Arkansas dedicates Part C-First Connections (31 FTEs) and Early Childhood Licensing (53 FTEs), showcasing a robust early childhood and special education focus.
 - State Literacy Initiatives: Programs like State Literacy Coaches (51 FTEs) highlight Arkansas's emphasis on literacy, a specialized effort not mirrored in Nevada.

OREGON DEPARTMENT OF EDUCATION

- Oregon employs over 800 FTEs, with notable strengths in:
 - Equity and Diversity Focus: The Office of Equity, Diversity, and Inclusion (15 FTEs) and specialized divisions like Office of Indian Education (6 FTEs) reflect Oregon's prioritization of underserved populations.
 - IT and Data Infrastructure: Oregon's IT Operations & Support (15 FTEs) and IT Policy Services (17 FTEs) demonstrate a stronger emphasis on technology and data than Nevada.

TENNESSEE DEPARTMENT OF EDUCATION

- Tennessee's Department of Education operates with approximately 900 FTEs, allocating substantial resources to:
 - Regional Support: The Centers for Regional Excellence (58 FTEs) deliver localized professional development and school support, a model not present in Nevada.
 - Special Education and Early Learning: Staffing in Special Education and Student Support (16 FTEs) and Early Learning (33 FTEs) underscores a strong focus on early childhood education.

UTAH DEPARTMENT OF EDUCATION

- Utah employs approximately 500 FTEs and emphasizes:
 - Large Teaching and Learning Division: The Director of Teaching & Learning Strategic Initiatives (79 FTEs) indicates a significant commitment to instructional improvement.
 - Special Education Focus: The Director of Special Education (41 FTEs) showcases substantial investment in supporting students with disabilities.

Nevada's Department of Education, with 200 FTEs, operates on a leaner model compared to Arkansas, Oregon, Tennessee, and Utah. Key observations include:

1. Resource Constraints: Nevada allocates fewer resources per division, likely reflecting budgetary limitations and a more centralized administrative structure.
2. Targeted Priorities: Staffing patterns indicate focused priorities, such as educator licensure and district support. However, areas like early childhood education, literacy, and regional support appear less emphasized compared to other states.

3. Technology and Data Needs: Nevada's allocation for Assessment, Data, and Accountability (14 FTEs) suggests limited capacity compared to Oregon and Tennessee, where IT and data-driven decision-making receive more resources.
4. Specialized Initiatives Gaps: Programs such as Arkansas's state literacy coaches or Tennessee's Centers for Regional Excellence are absent in Nevada, potentially limiting targeted school-level impact.

EXHIBIT A-4**NEVADA DEPARTMENT OF EDUCATION DIVISIONS & DEPARTMENTS**

Positions	Staff FTE
Office of the Superintendent	15
Educator Effectives & Family Engagement	
Career Readiness, Adult Learning, Educ. Options	4
Career Readiness, Adult Learning, Edu Options: Career & Tech Ed	15
EDLIFE: Educator Development, Support & Family Engagement	7
EDLIFE: Educator Licensure	20
Safe & Respectful Learning Environment	12
Student Achievement	
Assessment, Data & Accountability	14
Early Learning & Development	14
Inclusive Education	15
Data Systems, Management Unit, Operations Unit	15
Student School Support: GEAR UP	5
Student School Support	25
Teaching and Learning	16
Student Investment	
District Support Services	23
Fiscal Operations	12
Pupil Centered Funding	2

Source: Nevada Department of Education, 2024.

EXHIBIT A-5**ARKANSAS DEPARTMENT OF EDUCATION DIVISION & DEPARTMENTS**

Positions	Staff FTE
Office of Secretary	
Office of Secretary	3
Chief of Staff	
Chief of Staff	1
Legal Services	7
Legislative Services	1
Communications	
Communications	7
Deputy Commissioner	

Positions	Staff FTE
Deputy Commissioner	2
Office of Special Projects	2
District Operations	
Child Nutrition	17
District Operations	2
Fiscal Services	6
Health and Nutrition Unit	34
School Safety	2
Technology Initiatives and Resources	4
Thrive	1
Educator Effectiveness & Licensure	
Educator Effectiveness	11
Educator Effectiveness & Licensure	6
Educator Effectiveness and Licensure	2
Educator Licensure	16
Educator Preparation	3
Educator Support and Development	2
Professional Licensure Standards Board	9
Facilities and Transportation	
Facilities	13
Facilities and Transportation	6
Transportation	11
Federal Programs	
21st CCLC	4
Dispute Resolution	4
District Support	2
Early Childhood - Special Education	1
Federal Programs	8
Grants - Data Management	4
Migrant Education	2
Monitoring	6
Part C - First Connections	31
Special Education	12
Special Education/Arkansas State Transition Services	3
Special Education/Dawson Education Cooperative	2
Special Education/ESVI	5
Special Education/State Personnel Development Grant	5
Special Education/UALR	5
Special Programs - Special Education	5
Finance	
APSCN - Financial Management System	14
Central Support Services	8
Finance	14
Financial Accountability and Reporting	2
Fiscal and Administrative Services	1
LEA State Funding and Loans & Bonds	4
Human Resources	
Employee Induction	1

Positions	Staff FTE
Human Resources	10
Jobs for Arkansas Graduates	
Jobs for Arkansas Graduates	1
Office of Coordinated Support Services	
Office of Coordinated Support Services	9
Office of Early Childhood	
Content and Development	13
Direct Services and Operations	60
Licensing	53
OEC Directors Unit	2
OEC Finance	4
OEC IT	3
OEC Local Leads	2
Office of Information Technology	26
Data Reporting and Warehouse	4
Information Systems	3
IT Dev-Ops	6
IT Services	9
Office of the Chief Information Officer	
Data Reporting and Warehouse	4
Information Systems	3
IT Dev-Ops	6
IT Services	9
Office of the Chief Information Officer	4
Office of Learning Services	
Alternative Education	3
Assistant Commissioner's Office	5
Curriculum and Instruction	7
Disciplinary Literacy	2
Disciplinary Literacy - Play It Again Arkansas	1
District Support	1
English for Speakers of Other Languages	5
Gifted and Talented	4
Literacy	7
Math	4
RISE Arkansas	5
School Health Services	16
Science	2
Special Projects	2
State Literacy Coaches	51
STEM	2
STEM - Math	3
STEM - Science	2
Student Support Services	5
Public School Accountability	
APSCN - Student Management System	22
Assessment	11
Assistant Commissioner's Office	2

Positions	Staff FTE
School Performance	3
Standards and System Support	13
Systems of Support	1
School Choice and Parent Empowerment	
Charter School	1
Education Freedom Accounts	5
Education Options	4
Family and Community Engagement	2
School Choice and Parent Empowerment	2

Source: Arkansas Department of Education, 2024.

EXHIBIT A-6

OREGON STATE DEPARTMENT OF EDUCATION DIVISIONS & DEPARTMENTS

Positions	Staff FTE
Director of the Oregon Department of Education	
Educator Advancement Council	16
Youth Development Division	16
Office of Indian Education	6
Chief of Staff	
Office of the Director Chief of Staff	5
Office of Relations, Support & Management	98
Director Admin, Communications, Policy	18
State Board of Education	1
Health & Education	4
<i>Office of Finance Information Technology</i>	1
Leadership & Administration	8
Budget Services	13
Business Services	12
Accounting Services	14
Fiscal Grant Services	13
Procurement Services	22
School Facilities	11
School Finance	14
IT Application Development	18
IT Operations & Support	15
IT Policy & Enterprise Services	17
IT SSF Modernization	11
<i>Office of Enhancing Student Opportunities</i>	1
OESO Leadership	3
Inclusive Services	11
Resource Mgmt. & Operations	12
Programs for Specific Operations	7
IDEA Compliance	15
IDEA Initiatives	9
School of the Deaf	82
Deputy Director	
<i>Office of ED. Innovation & Improvement</i>	1
OELL Leadership & Admin	12

Positions	Staff FTE
District & School Effectiveness	5
Grant Mgmt. & Monitoring	14
High School Success	8
Research & Information Services	8
Secondary & Post Secondary Programs	19
Student Success	3
System Capacity & Improvement	12
<i>Office of Equity, Diversity & Inclusion</i>	1
Equity Programs	15
Safe & Inclusive Schools	6
<i>Research, Assessment, Data, Accountability</i>	1
Radar Leadership & Administration	12
Accountability & Data	12
Assessment & Student Reporting	10
Research & Management	7
<i>Office of Teaching & Learning</i>	1
OTLA Leadership & Administration	5
Early Literacy	15
Educational Program Standards	10
Federal Programs	22
Multilingual & Migrant Education	12
Standards & Instructional Support	14
Well-Rounded, Integrated & Digital Learning	6

Source: Oregon Department of Education, 2024.

EXHIBIT A-7

TENNESSEE DEPARTMENT OF EDUCATION DIVISIONS & DEPARTMENTS

Positions	Staff FTE
Office of the Commissioner	
Office of the Commissioner	4
Office of the Deputy Commissioner	
Office of the Deputy Commissioner	2
Operation Data Strategy	3
Performance Management	4
Office of Strategy	1
Office of Academics	
Office of Academics	2
Academics and Instructional Strategy	27
Centers for Regional Excellence (CORE)	58
College, Career and Technical Education (CCTE)	25
Early Learning	33
Professional Development	26
Special Education and Student Support	16
Office of Operations	103
Office of Operations	3
Application Development	7
Budget	3
Coordinated School Health	3

Positions	Staff FTE
Finance	1
Finance Analytics	3
Healthy Schools	4
Human Resources	5
Internal Audit	5
Procurement & Logistics	9
Safety & Transportation	13
School Finance	9
School Nutrition	21
State Education Technology	9
State Special Schools	4
Student & Family Supports	4
Office of the Chief Program Officer	
Office of the Chief Program Officer	1
Accountability and Reporting	7
Assessment & Accountability	3
Assessment Development and Psychometrics	9
Assessment Logistics	6
Choice	29
ESEA	10
Federal Programs & Oversight	12
Grants Management	5
IDEA & NEP	9
Performance & Evaluation	13
Relief Funding	2
Policy & Legislative Affairs	
Policy & Legislative Affairs	4
Communication & Engagement	
Communication & Engagement	11
Office of the General Counsel	
Office of the General Counsel	18
School Turnaround	
School Turnaround	5
Achievement School District	
Achievement School District	9

Source: Tennessee Department of Education, 2024.

EXHIBIT A-8

UTAH DEPARTMENT OF EDUCATION DIVISIONS-DEPARTMENTS

Positions	Staff FTE
State Superintendent of Public Instruction	5
Chief of Staff	6
Deputy State Superintendent of Policy	15
Chief Audit Executive	8
UL Lead	3
Parent Engagement	1
Deputy Superintendent of Student Achievement	3
Assistant Superintendent Student Learning	5

Positions	Staff FTE
Director Career and Technical Education	25
Director Teaching & Learning Strategic Initiatives	79
Test & Data Coordinator	7
Assessment Development Coordinator	8
Assistant Superintendent Student Support	9
Director Special Education	41
Director School Improvement	27
Director Child Nutrition	27
Director School Safety and Student Services	22
Coordinator Student Support Fiscal, Data	7
Special Education Dispute Resolution Specialist	1
Deputy Superintendent of Operations	10
State Charter School Executive Director	9
Human Resources Field Offices	4
Assistant Superintendent Financial Operations	53
School Children's Trust	3
Administrative Services Manager	5
Director Technology	48
Director of Data & Statistics	9

Source: Utah Department of Education, 2024.

Department of Education Salaries

Exhibit A-9 shows the composite, average salaries for all employees at the Nevada Department of Education compared to the Arkansas and Oregon departments of education. The chart also shows the average salaries as adjusted for the cost-of-living in each state. The departments of education for Kentucky and Utah did not respond to requests for the data. Tennessee provided only average salaries by position which did not allow for a comparison of the overall average salary. The key observations include:

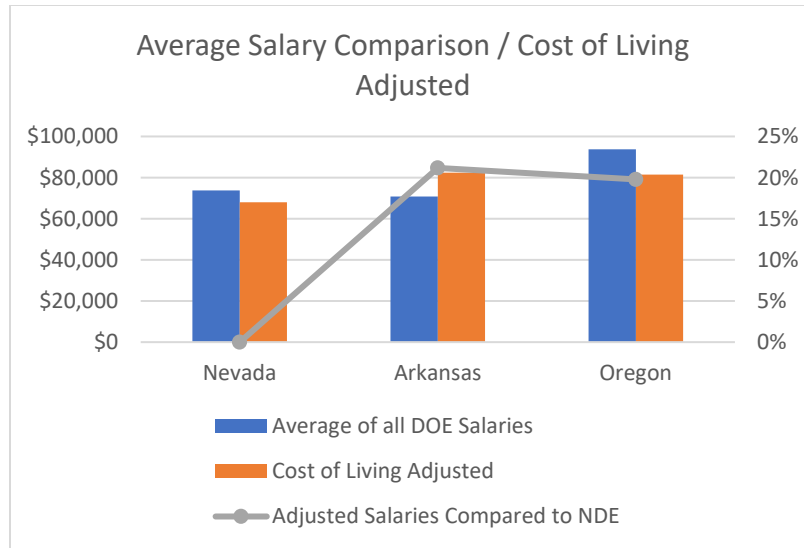
- **Nevada (NDE):**
 - **Average Salary:** \$73,790.
 - **Cost-of-Living Adjusted Salary:** \$68,009.
 - Serves as the baseline for comparison (0.0% adjustment).
- **Arkansas (ADE):**
 - **Average Salary:** \$70,791 (4.1% lower than NDE's average salary).
 - **Cost-of-Living Adjusted Salary:** \$82,410 (21.2% higher than NDE's adjusted salary).
 - Arkansas offers lower nominal salaries but adjusts favorably when considering cost of living, indicating better relative purchasing power compared to Nevada.
- **Oregon (ODE):**
 - **Average Salary:** \$93,756 (27% higher than NDE's average salary).
 - **Cost-of-Living Adjusted Salary:** \$81,456 (19.8% higher than NDE's adjusted salary).
 - Oregon's DOE salaries are among the highest nominally but adjust to a smaller advantage due to higher living costs.

- **Cost-of-Living Impact:**
 - Tennessee offers the highest cost-of-living-adjusted salaries, making it the most competitive state for DOE employees.
 - Despite having the lowest adjusted salary, Nevada maintains a baseline average salary close to Arkansas but lags significantly when considering purchasing power.
- **Arkansas' Efficiency:**
 - Although Arkansas offers nominal salaries lower than Nevada's, its cost-of-living adjustment provides a 21.2 percent advantage, demonstrating a better alignment between wages and affordability.
- **Oregon's High Nominal Salaries:**
 - Oregon pays significantly higher nominal salaries compared to Nevada (+27%), but its cost-of-living adjustment reduces this advantage to 19.8 percent, indicating the impact of its higher living costs.
- **Nevada's Position:**
 - Nevada lags behind all three states in terms of cost-of-living-adjusted salaries, suggesting that NDE employees have less purchasing power despite a moderate nominal salary.
- NDE offers the least competitive salaries when adjusted for cost of living, making it potentially harder to attract and retain employees compared to Arkansas or Oregon.
- This comparison highlights the importance of not just nominal salaries but also their real-world purchasing power, with cost-of-living adjustments providing a clearer picture of compensation fairness.

EXHIBIT A-9
STATE DOE SALARY AVERAGES & ADJUSTED AVERAGES

State	Average of all DOE Salaries	Cost of Living Adjusted	Adjusted Salaries Compared to NDE
Nevada	\$73,790	\$68,009	0.0%
Arkansas	\$70,791	\$82,410	21.2%
Oregon	\$93,756	\$81,456	19.8%

Source: NDE, ADE, ODE, 2024.



Salary Comparison by Position

Four departments of education (Nevada, Tennessee, Arkansas and Oregon) provided salary information by the positions in the organization. Using position titles only, similarly titled positions were compiled to illustrate how salaries in other state departments of education compared with Nevada. As a result of the variety in the position titles, only 27 of Nevada's 47 position titles matched with at least one of the other states. Different states might use identical titles for positions with different scopes of responsibility, or conversely, different titles for similar roles. For the analysis to be meaningful, job descriptions and qualifications should also be considered. There are four positions for which each state has position titles that are identical or similar: Audit Manager, Deputy Superintendent, IT Manager, and Public Information Officer. For the chief executive position, each of the states has a different title: Superintendent of Public Instruction in Nevada, Commissioner Education in Tennessee, Secretary of Education in Arkansas, and Director in Oregon.

Exhibit A-10 shows the salaries for the comparable position by position title and illustrates the following observations:

EXHIBIT A-10
AVERAGE SALARIES BY COMPARABLY TITLED POSITIONS

Position	NDE	TDE	ADE	ODE
ACCOUNTING ASSISTANT 2	\$39,022		\$46,743	\$61,113
ACCOUNTING ASSISTANT 3	\$43,327		\$58,053	\$81,156
ADMIN ASSISTANT 2	\$44,191	\$58,272		\$48,701
ADMIN ASSISTANT 3	\$44,538	\$59,160		\$43,718
ADMIN ASSISTANT 4	\$49,277	\$68,268		\$67,307
ADMINR, OFC OF ASSESS,DATA&ACC	\$105,950			\$143,808
AUDIT MANAGER	\$75,540	\$150,024	\$71,911	\$107,460
AUDITOR 2	\$61,404	\$72,660		\$61,032
AUDITOR 3	\$73,554	\$87,684		\$73,752
BUDGET ANALYST 2	\$67,618		\$49,805	
BUDGET ANALYST 3	\$88,193		\$54,201	

Position	NDE	TDE	ADE	ODE
DEP SUPT ADMIN/FISCAL SVCS	\$104,657	\$235,404	\$191,333	\$229,272
DEP SUPT INST/RSRCH/EVAL (EA)	\$113,422	\$235,404	\$191,333	\$229,272
EDUCATION & INFORMATION OFCR	\$69,741	\$138,960		
EDUCATION PROGRAMS DIRECTOR	\$86,489	\$107,784		\$99,429
EDUCATION PROGRAMS PROFESSIONL	\$92,264	\$93,120		\$112,251
EDUCATION PROGRAMS SUPERVISOR	\$96,629	\$180,648		\$180,303
EXECUTIVE ASSISTANT	\$63,973	\$99,804		\$76,488
GRANTS & PROJECTS ANALYST 2	\$73,287	\$71,880	\$70,877	
IT MANAGER 1	\$90,749	\$110,004	\$102,124	\$158,400
IT PROFESSIONAL 2	\$87,358	\$90,156	\$62,842	\$92,421
IT PROFESSIONAL 3	\$87,978		\$81,636	\$116,470
MANAGEMENT ANALYST 1	\$62,847			\$86,775
MANAGEMENT ANALYST 2	\$62,888			\$92,286
MANAGEMENT ANALYST 3	\$81,094			\$108,295
PUBLIC INFORMATION OFFICER 2	\$84,229	\$145,584	\$72,225	\$174,588
SUPT OF PUBLIC INSTRUCTION	\$145,217	\$270,336	\$262,650	\$288,516

Sources: NDE, TDE, ADE, ODE, 2024.

Department of Education Salaries Adjusted for Cost-of-Living

Exhibit A-11 shows the cost-of-living adjusted salaries for the 27 positions that had the same or similar position titles. It also shows the percentage difference from the Nevada salaries. Data for the cost-of-living came from the U.S. Bureau of Economic Analysis (BEA) – Regional Price Parities (RPP) 2023. Cost-of-living adjustments are essential to ensure meaningful comparisons of salaries across the states. They reflect the real value of compensation in each state, providing a clearer picture of which state offers the best financial situation for employees relative to their local economic conditions. This approach helps states assess their competitiveness and address gaps in employee compensation to attract and retain qualified education professionals.

Key observations from this analysis include the following:

- **NDE lags behind TDE, ADE, and ODE** for most positions, often significantly, after adjusting for cost of living.
- Leadership positions such as Deputy Superintendent and Superintendent show the **largest disparities** in adjusted salaries, where TDE, ADE, and ODE pay over **100 percent more** than NDE.

High-Level Positions

Deputy Superintendent of Administration/Fiscal Services:

- NDE: \$96,458 | TDE: \$264,796 (+175%) | ADE: \$222,739 (+131%) | ODE: \$199,194 (+107%)
 - NDE salaries for this position are drastically lower, which may impact the ability to attract qualified candidates for top roles.

Superintendent of Public Instruction:

- NDE: \$133,841 | TDE: \$304,090 (+127%) | ADE: \$305,762 (+128%) | ODE: \$250,666 (+87%)
 - Similarly, Nevada pays significantly less for its top leadership position, potentially weakening its competitiveness.

Mid-Level and Specialist Positions

Audit Manager:

- NDE: \$69,622 | TDE: \$168,756 (+142%) | ADE: \$83,715 (+20%) | ODE: \$93,362 (+34%)
 - NDE is uncompetitive, especially compared to TDE, where salaries are more than double.

Education Programs Supervisor:

- NDE: \$88,899 | TDE: \$203,204 (+129%) | ODE: \$156,649 (+76%)
 - Similar trends show a lack of parity for these specialized and critical education roles.

Public Information Officer 2:

- NDE: \$77,630 | TDE: \$163,762 (+111%) | ADE: \$84,080 (+8%) | ODE: \$151,684 (+95%)
 - Nevada trails all states, particularly Tennessee and Oregon, in compensating this role.

Administrative and Support Roles

Accounting Assistant 2 and 3:

- **Accounting Assistant 2:** NDE: \$35,965 | ADE: \$54,416 (+51%) | ODE: \$53,095 (+48%)
- **Accounting Assistant 3:** NDE: \$39,933 | ADE: \$67,582 (+69%) | ODE: \$70,509 (+77%)
 - Even lower-level positions receive significantly higher pay in ADE and ODE.

Administrative Assistants:

- **Admin Assistant 2:** NDE: \$40,729 | TDE: \$65,548 (+61%) | ODE: \$42,311 (+4%)
- **Admin Assistant 3:** NDE: \$41,048 | TDE: \$66,547 (+62%) | ODE: \$37,983 (-7%).
 - NDE salaries are uncompetitive with TDE and ADE, but occasionally close to ODE.

IT and Technical Roles

IT Manager 1:

- NDE: \$83,640 | TDE: \$123,739 (+48%) | ADE: \$118,887 (+42%) | ODE: \$137,619 (+65%)
 - Nevada pays significantly less in tech roles, where competitive salaries are critical to recruitment.

IT Professional 2:

- NDE: \$80,514 | TDE: \$101,413 (+26%) | ADE: \$73,157 (-9%) | ODE: \$80,296 (0%).
 - NDE is slightly competitive with ADE and ODE but trails TDE.

Management Analysts

- Management Analyst 1: NDE: \$57,923 | ODE: \$75,391 (+30%)
- Management Analyst 2: NDE: \$57,962 | ODE: \$80,179 (+38%).
 - NDE salaries lag across all analyst roles.

In summary:

- **Significant Gaps in Leadership Salaries:**
 - NDE struggles to compete for leadership roles, particularly compared to TDE and ADE.
- **Specialist and Mid-Level Positions Undercompensated:**
 - Many critical positions (e.g., Audit Manager, Education Programs Supervisor) show gaps ranging from **20 percent to 130 percent** in salaries compared to peers.
- **Competitiveness in Entry-Level Roles:**
 - Some administrative and IT positions are more competitive with ODE but still lag significantly behind TDE and ADE.
- **Implications for Recruitment and Retention:**
 - Nevada's cost-of-living-adjusted salaries reveal significant disadvantages in attracting and retaining top talent for most education department roles.

EXHIBIT A-11
DEPARTMENT OF EDUCATION COST-OF-LIVING ADJUSTED SALARIES
% DIFFERENCE FROM NDE

Position	NDE Adjusted	TDE Adjusted	ADE Adjusted	ODE Adjusted	TDE	ADE	ODE
ACCOUNTING ASSISTANT 2	\$35,965		\$54,416	\$53,095	51%	48%	
ACCOUNTING ASSISTANT 3	\$39,933		\$67,582	\$70,509	69%	77%	
ADMIN ASSISTANT 2	\$40,729	\$65,548		\$42,311	61%		4%
ADMIN ASSISTANT 3	\$41,048	\$66,547		\$37,983	62%		-7%
ADMIN ASSISTANT 4	\$45,417	\$76,792		\$58,477	69%		29%
ADMINR, OFC OF ASSESS, DATA&ACC	\$97,650			\$124,942			28%
AUDIT MANAGER	\$69,622	\$168,756	\$83,715	\$93,362	142%	20%	34%
AUDITOR 2	\$56,594	\$81,732		\$53,025	44%		-6%
AUDITOR 3	\$67,791	\$98,632		\$64,076	45%		-5%
BUDGET ANALYST 2	\$62,321		\$57,980			-7%	
BUDGET ANALYST 3	\$81,284		\$63,097			-22%	
DEP SUPT ADMIN/FISCAL SVCS	\$96,458	\$264,796	\$222,739	\$199,194	175%	131%	107%
DEP SUPT INST/RSRCH/EVAL (EA)	\$104,536	\$264,796	\$222,739	\$199,194	153%	113%	91%
EDUCATION & INFORMATION OFCR	\$64,277	\$156,310			143%		
EDUCATION PROGRAMS DIRECTOR	\$85,212	\$121,242		\$86,385	42%		1%
EDUCATION PROGRAMS PROFESSIONL	\$76,050	\$104,747		\$97,525	38%		28%
EDUCATION PROGRAMS SUPERVISOR	\$88,899	\$203,204		\$156,649	129%		76%
EXECUTIVE ASSISTANT	\$58,961	\$112,265		\$66,454	90%		13%
GRANTS & PROJECTS ANALYST 2	\$67,546	\$80,855	\$82,511		20%	22%	
IT MANAGER 1	\$83,640	\$123,739	\$118,887	\$137,619	48%	42%	65%
IT PROFESSIONAL 2	\$80,514	\$101,413	\$73,157	\$80,296	26%	-9%	0%
IT PROFESSIONAL 3	\$81,086		\$95,036	\$101,190	17%		25%

Position	NDE Adjusted	TDE Adjusted	ADE Adjusted	ODE Adjusted	TDE	ADE	ODE
MANAGEMENT ANALYST 1	\$57,923			\$75,391			30%
MANAGEMENT ANALYST 2	\$57,962			\$80,179			38%
MANAGEMENT ANALYST 3	\$74,741			\$94,087			26%
PUBLIC INFORMATION OFFICER 2	\$77,630	\$163,762	\$84,080	\$151,684	111%	8%	95%
SUPT OF PUBLIC INSTRUCTION	\$133,841	\$304,090	\$305,762	\$250,666	127%	128%	87%

Sources: NDE, TDE, ADE, and ODE, 2024; cost of living data from the U.S. Bureau of Economic Analysis (BEA) – Regional Price Parities (RPP) 2023.

State Employee Benefits

State-paid benefits refer to the specific benefits that the state government covers either fully or partially for its employees. In Arkansas, Kentucky, Nevada, Tennessee, and Utah, state government employees receive several state-paid benefits that typically include healthcare coverage, retirement contributions, and certain types of paid leave. Below are the specific state-paid benefits for each state:

Arkansas:

- **Healthcare:** The state pays a significant portion of health insurance premiums for employees. This includes coverage for medical, dental, vision, and prescription drug plans.
- **Retirement Contributions:** The state contributes to employee pensions through the Arkansas Public Employees Retirement System (APERS) or the Arkansas Teacher Retirement System (ATRS), covering a portion of the costs.
- **Life Insurance:** The state provides basic life insurance coverage for employees, often with the option to purchase additional coverage at the employee's expense.
- **Paid Leave:** The state covers the cost of vacation, sick leave, and paid holidays.

Kentucky:

- **Healthcare:** The state contributes toward the cost of employee health insurance through the Kentucky Employees Health Plan (KEHP), which covers medical, dental, and vision care.
- **Retirement Contributions:** Kentucky provides contributions to the Kentucky Retirement System (KRS) or the Kentucky Teachers' Retirement System (KTRS). The state funds a percentage of employee retirement benefits.
- **Life Insurance:** The state provides a basic life insurance policy at no cost to employees.
- **Paid Leave:** Employees are granted paid vacation, sick leave, and state-recognized holidays, with costs fully covered by the state.

Nevada:

- **Healthcare:** The state contributes a portion of health insurance premiums for employees through the Public Employees' Benefits Program (PEBP). This includes medical, dental, and vision insurance.
- **Retirement Contributions:** The state contributes to the Public Employees' Retirement System (PERS) of Nevada. The state covers the employer share of retirement contributions.
- **Life Insurance:** Basic life insurance is provided at no cost to state employees.

- Paid Leave: Nevada covers the cost of accrued annual leave, sick leave, and paid holidays for its employees.

Tennessee:

- Healthcare: The state pays a portion of the employee health insurance premiums, which includes medical, dental, and vision care.
- Retirement Contributions: Tennessee contributes to the Tennessee Consolidated Retirement System (TCRS), providing funding for pension plans, with additional state contributions to optional 401(k) and 457 plans.
- Life Insurance: State employees receive basic life insurance coverage at no cost.
- Paid Leave: Employees receive state-paid vacation days, sick leave, and public holidays.

Utah:

- Healthcare: The state covers a substantial portion of health insurance premiums for employees, which includes medical, dental, and vision benefits.
- Retirement Contributions: The state contributes to the Utah Retirement Systems (URS) for pension benefits. The state also makes contributions to optional 401(k) or 457 plans.
- Life Insurance: Utah provides state-paid basic life insurance coverage for employees.
- Paid Leave: Employees receive state-paid annual leave, sick leave, and paid holidays.

In each state, healthcare premiums, retirement contributions, life insurance, and paid leave are the primary state-paid benefits, with additional employee-specific options typically available at a subsidized rate. The actual state contribution can vary depending on the employee's plan and role within the government.

State Department Organization Chart Comparison

Three of the comparison departments of education, [Kentucky](#), [Oregon](#) and [Utah](#), provided organization charts displaying a visual overview of the structure of an organization, including roles, departments, and reporting relationships. The other two states, [Tennessee](#) and [Arkansas](#), provided lists of positions by organizational division including the employees that report to each manager in the division and department. Links to the actual organization charts for each of the five comparison state departments of education, along with the Nevada Department of Education, are provided with a summary of each district's chart followed by an analysis.

Span of Control

- Nevada: The Nevada Department of Education exhibits a somewhat narrow span of control, with multiple divisions under the State Superintendent, including Educator Effectiveness, Student Achievement, and Student Investment. Each division further divides into offices (e.g., Office of Assessments, Office of Career Readiness, Office of Inclusive Education), with each overseeing specific functions and sub-units. This structure enables managers to maintain focused oversight within each office.
- Kentucky: Kentucky's structure includes associate commissioners overseeing various offices (e.g., Career and Technical Education, Special Education and Early Learning, and Educator Licensure and Effectiveness). The span of control appears moderate, with associate

commissioners handling both high-level policy and operational functions across numerous support branches.

- Oregon: The Oregon Department of Education also shows a narrow span of control, with each department led by specific directors or associate commissioners, often segmented by distinct education focuses such as equity, accountability, and support services. This structure provides direct oversight and is closely aligned with Oregon's goals in educational support and program management.
- Utah: Utah appears to have a broader span of control under certain high-level managers, with fewer divisions or layers than Nevada. Each main division (e.g., Superintendent's Office, Communications, and specialized areas) oversees multiple units directly, suggesting that managers may handle more diverse responsibilities within a single reporting level. This broader span of control could mean Utah relies on higher autonomy among department heads and less detailed oversight than Nevada.
- Utah: Utah's lines of authority seem less compartmentalized, with many divisions directly under the top-level administration. This streamlined authority structure may encourage a more collaborative and flexible approach, where different units work together without strict boundaries. However, it could also lead to role ambiguity if the responsibilities are not clearly defined across the broader span of control.
- Tennessee: Tennessee's Department of Education (based on the employee and position titles list) appears to have a broader span of control. Given its list of positions, Tennessee seems to assign several responsibilities to individual managers or directors, which implies that managers may oversee a larger number of employees or functional areas. This broader span could improve flexibility but may require managers to have strong delegation skills to maintain efficiency across diverse functions.
- Arkansas: Arkansas also seems to exhibit a broad span of control, where directors or unit heads oversee a wide range of roles, covering diverse functions such as student support, curriculum development, and operational management. This structure can enhance cross-functional awareness but might strain managers if they are responsible for too many direct reports or varied tasks without adequate middle-management support.

Management Layers

- Nevada: Nevada's structure has multiple hierarchical layers from the State Superintendent down through the divisions and offices, with specific layers for program management. For example, the Student Achievement Division oversees five distinct offices, and the Educator Effectiveness Division oversees three. This layered structure allows for a systematic flow of authority but may introduce delays in decision-making due to the multiple levels involved.
- Kentucky: Kentucky exhibits a slightly more complex hierarchy, with an added layer involving advisors and specialized branches under each division. The organization comprises the Commissioner, Deputy Commissioners, and associate commissioners who manage a further subdivided branch structure, creating a system with potentially five to six management layers for focused leadership and departmental coordination.
- Oregon: Oregon's structure is similarly multi-layered, with roles ranging from the Superintendent to division heads and program-specific directors. This layering ensures detailed oversight across specific educational focuses, though the layers may add complexity to communication channels.

- Utah: Utah's Department of Education appears to have a simpler, more streamlined structure with fewer management layers than Nevada. Many functional units report directly to key executives, reducing the number of intermediate layers. This setup can allow for faster decision-making and better interdepartmental communication but may limit specialization in specific areas where more layers would support detailed oversight.
- Tennessee: Tennessee's staffing list suggests a simpler, flatter structure compared to Nevada, with fewer management layers between top leadership and frontline staff. This flatter structure can speed up decision-making and make the organization more responsive to changes, but it may lead to role overload for senior managers, especially if they are directly responsible for a wide array of tasks without intermediate support.
- Arkansas: Arkansas seems to have a hybrid structure, with some functions (like administrative and operational roles) having more layers, while other areas (such as program-specific roles) are closer to a flat structure. This mixed approach may work well for a balanced distribution of tasks but can create inconsistencies in authority levels and communication flow between different functional areas.

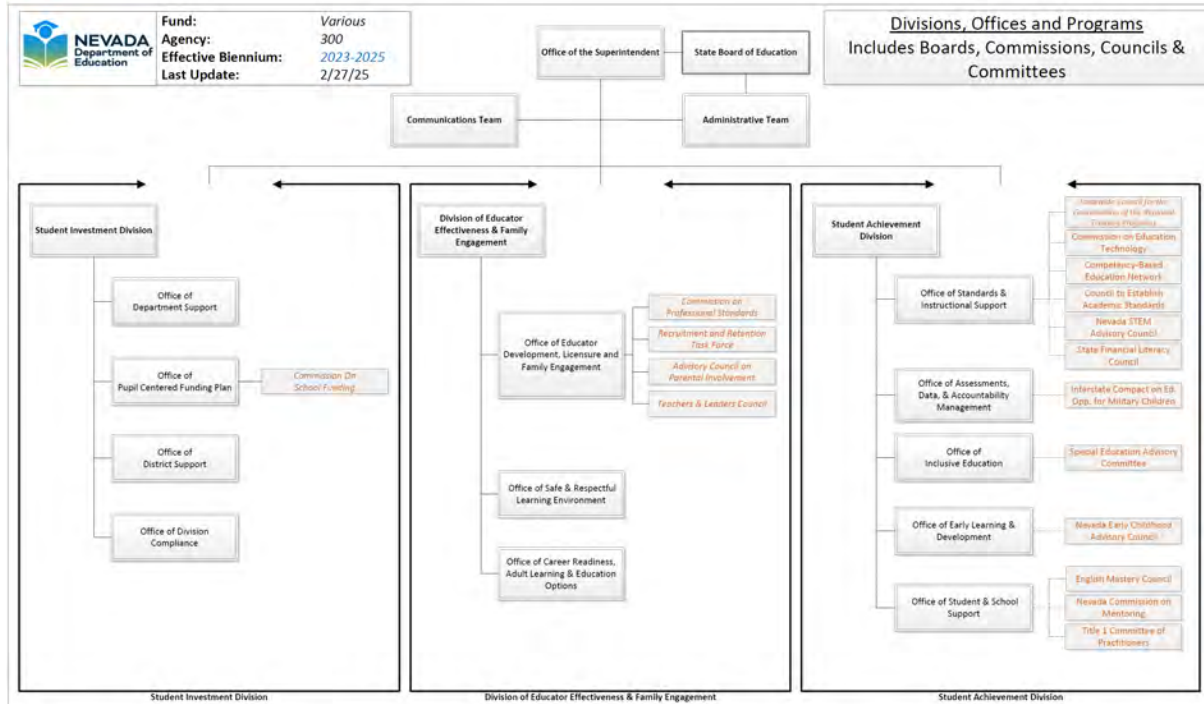
Lines of Authority

- Nevada: Nevada's lines of authority are clearly defined within each division. Each division head has distinct responsibilities, with designated offices focusing on specific mandates like Early Learning, Career Readiness, or Safe & Respectful Learning Environments. The clear delineation of roles helps prevent role overlap and ensures accountability within each department but may also restrict cross-functional collaboration due to rigidly defined divisions.
- Kentucky: Kentucky has a more complex line of authority, with associate commissioners directly managing multiple divisions. This arrangement may facilitate specialized support but can also create overlapping responsibilities if the boundaries of authority are not clearly defined. Kentucky's structure enables flexibility across divisions, such as legal services and educator licensure, with clear reporting lines within each office.
- Oregon: Oregon maintains distinct lines of authority across divisions, with a straightforward structure that allows office directors to directly manage their assigned program areas. This setup provides clarity and enables focused management within the framework of state-specific educational standards and accountability.
- Utah: Utah's lines of authority seem less compartmentalized, with many divisions directly under the top-level administration. This streamlined authority structure may encourage a more collaborative and flexible approach, where different units work together without strict boundaries. However, it could also lead to role ambiguity if the responsibilities are not clearly defined across the broader span of control.
- Tennessee: Tennessee's lines of authority appear to be less segmented, with a more direct reporting structure and fewer specialized divisions. This approach simplifies communication and makes it easier to coordinate across functions. However, the lack of strict divisions may lead to role overlap, as different functions could be managed under the same director without distinct boundaries.
- Arkansas: Arkansas's structure exhibits a balanced line of authority with specialized roles but fewer layers than Nevada. Directors and managers often handle diverse responsibilities within

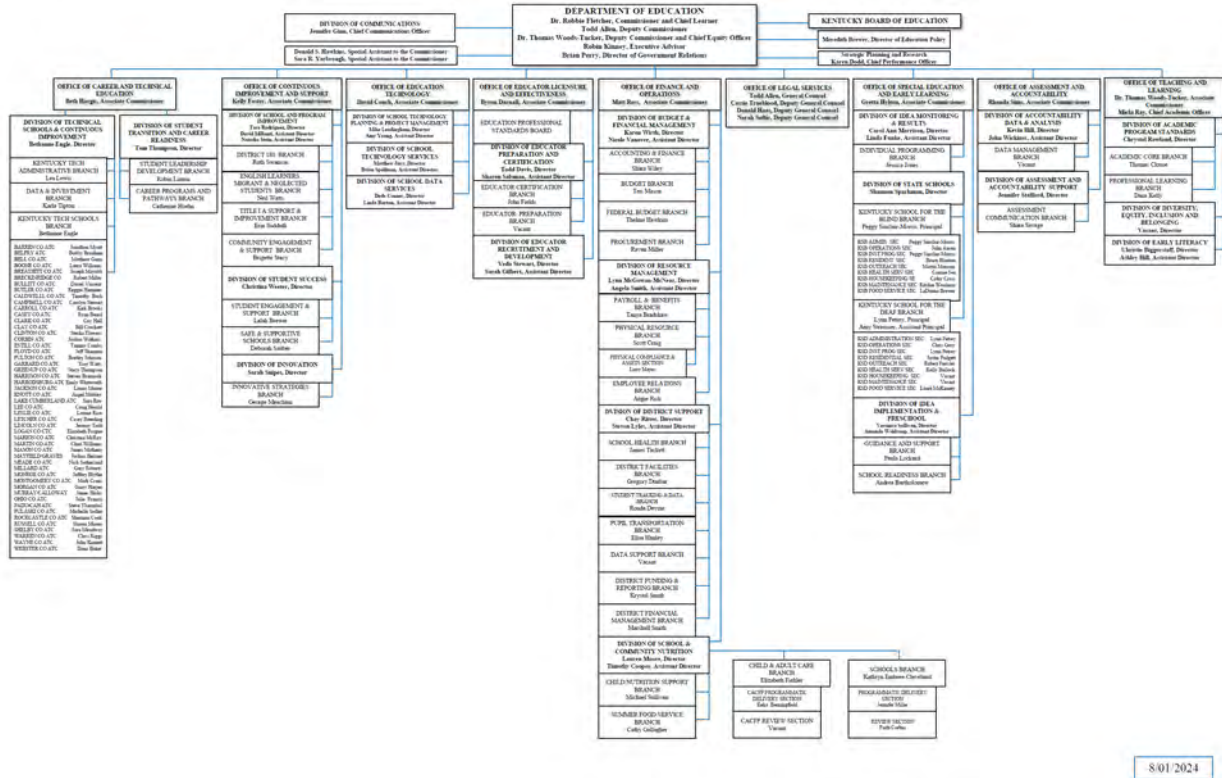
their units, which provides flexibility but may result in less clearly defined authority lines, especially if managers are overseeing functions that span multiple educational areas.

ORGANIZATION CHARTS

NEVADA DEPARTMENT OF EDUCATION

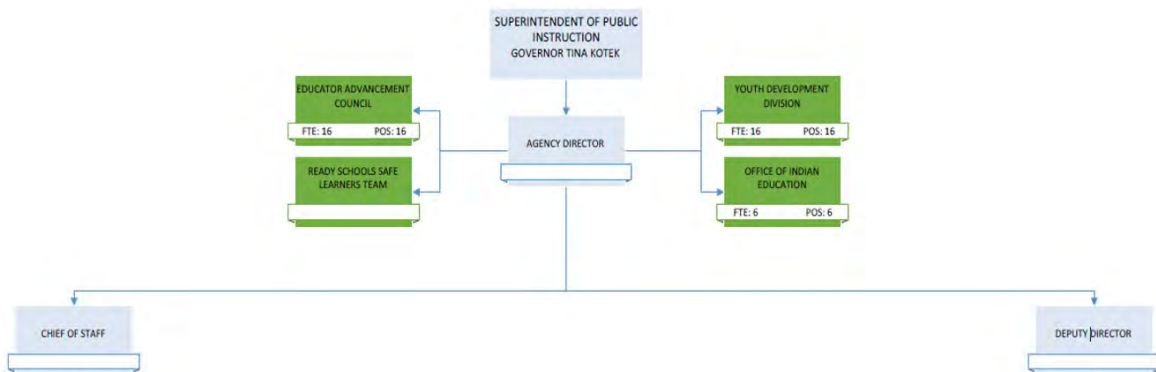


KENTUCKY DEPARTMENT OF EDUCATION



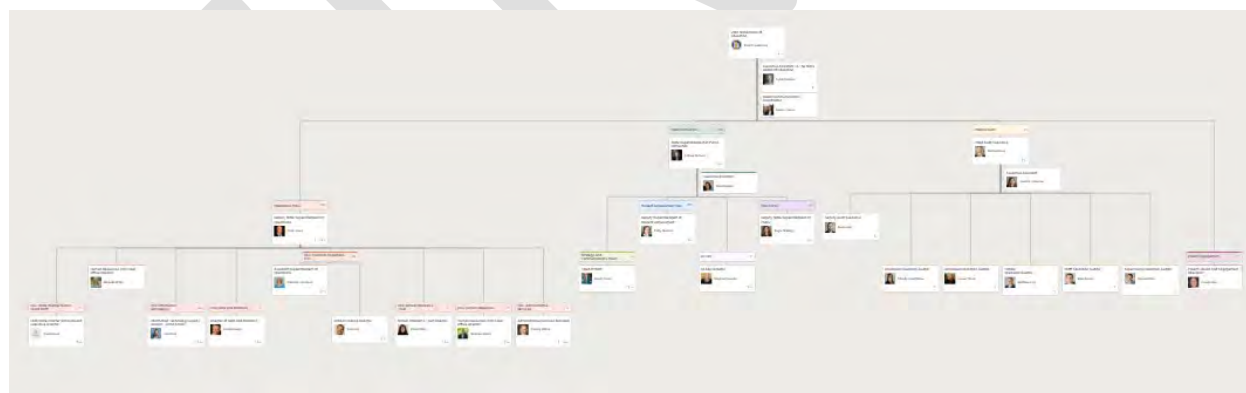
[https://www.education.ky.gov/comm/contacts/Documents/KDE Organizational Chart.pdf](https://www.education.ky.gov/comm/contacts/Documents/KDE%20Organizational%20Chart.pdf)

OREGON DEPARTMENT OF EDUCATION



[illegible]

UTAH DEPARTMENT OF EDUCATION



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TENNESSEE DEPARTMENT OF EDUCATION

Tennessee's organization chart was not available. However, a list of employees organized by division and departments is available at: [Tennessee Department of Education](#).

ANALYSIS OF EACH ORGANIZATION CHART

Nevada Department of Education

- Pros:
 - Clear Divisional Focus: The structure is divided into specific divisions (e.g., Student Achievement, Inclusive Education), allowing for targeted expertise and specialized focus within each office.
 - Streamlined Authority: With a well-defined hierarchy, lines of authority are clear, reducing the risk of ambiguity in roles and responsibilities.
 - Balanced Span of Control: The narrow span of control allows managers to provide closer supervision and guidance, which can be beneficial for program oversight and accountability.
- Cons:
 - Potential Bottlenecks: With multiple layers, decision-making might slow down as approvals and communication need to pass through several levels.
 - Limited Flexibility Across Divisions: Focused divisions with specific mandates can make inter-departmental collaboration challenging, especially when addressing multifaceted educational issues.

Kentucky Department of Education

- Pros:
 - Broad Management Layers: Kentucky's structure, with associate commissioners and several specialized branches under each division, supports detailed supervision, and allows the department to address diverse educational functions.
 - Flexible Cross-Divisional Coordination: The layered structure supports flexibility, with associate commissioners able to oversee multiple areas and manage overlaps across functions like legal services, career readiness, and special education.
 - Enhanced Specialization: Each office and division focuses on specific areas, fostering deep expertise within each department, especially for complex areas like technical schools and student transitions.
- Cons:
 - Complex Communication Channels: The multiple layers and wide span of control can lead to communication delays and potential misalignment, as decisions may take longer to move through the hierarchy.
 - Overlapping Responsibilities: Given the complex hierarchy, there might be overlaps in responsibilities, leading to confusion or inefficiency without clear boundaries between roles.
 - High Administrative Overhead: The broad structure with various advisors, managers, and specialized branches may lead to increased administrative costs and efforts to coordinate across offices.

Oregon Department of Education

- Pros:
 - Clear Lines of Authority: Oregon's hierarchy is straightforward, with well-defined lines of authority for each division, promoting clarity and accountability within each office.
 - Focused Program Management: The narrow span of control, combined with a clear reporting structure, allows for focused attention on specialized areas such as equity, inclusion, and early literacy.
 - Efficient Decision-Making: With fewer administrative layers compared to Kentucky, the organization can potentially make quicker decisions, especially within program-specific offices.
- Cons:
 - Reduced Cross-Functional Flexibility: The distinct lines of authority may limit cross-divisional collaboration, making it challenging to address interconnected issues across educational functions.
 - Limited Upper-Level Support for Broad Goals: Fewer management layers might mean less support for department-wide strategic goals, as divisions may focus more on their own objectives rather than unified, cross-departmental initiatives.
 - Risk of Managerial Overload: Directors and program heads may experience a high workload due to fewer intermediate layers, which could lead to challenges in maintaining oversight and engagement across all areas.

Utah Department of Education

- Pros:
 - Broader span of control may foster interdepartmental collaboration.
 - Fewer management layers allow for faster decision-making and communication.
- Cons:
 - Less specialization and detailed oversight within certain functional areas.
 - Risk of role ambiguity with broader managerial oversight.

Tennessee Department of Education

- Pros:
 - Flatter structure allows for faster decision-making and easier communication.
 - Broad span of control fosters flexibility and responsiveness.
- Cons:
 - Role overload risk for managers with broad responsibilities.
 - Potential role overlaps due to less-defined divisions.

Arkansas

- Pros:
 - Hybrid structure supports both specialization and flexibility in operations.

- Balanced lines of authority encourage a mix of oversight and autonomy.
- Cons:
 - Inconsistent layers across functions may lead to uneven communication.
 - Broader span of control might strain managers overseeing diverse tasks.

STATE EDUCATION DATA

Basic Information

Number of School Districts, Public Schools, Charter Schools 2013-14 to 2022-23

The table below shows the changes in the number of school districts, public schools and charter schools from 2012-14 to 2022-23.

Nevada, with its small number of school districts and growing number of public and charter schools, stands out for its sharp increase in educational infrastructure, particularly in charter schools, over the last decade. This contrasts with Kentucky, where charter schools are nonexistent, and with Arkansas, which saw only a moderate increase in public schools. Nevada's educational landscape reflects its fast-growing population and efforts to expand school choice through the charter system.

NUMBER OF SCHOOL DISTRICTS, PUBLIC SCHOOLS, CHARTER SCHOOLS, 2013-14 TO 2022-23

	School Districts		Public Schools		Charter Schools	
	2013-14	2022-23	2013-14	2022-23	2013-14	2022-23
State						
Arkansas	288	300	1,112	1,098	52	103
Kentucky	194	176	1,565	1,542	0	0
Nevada	19	20	653	748	41	101
Oregon	220	222	1,246	1,286	124	132
Tennessee	140	148	1,855	1,900	72	114
Utah	138	162	1,006	1,102	95	140

Source: NCES, 2024.

Percentage of Public Elementary and Secondary Schools by Enrollment Size of School, 2021-22

The table below provides an analysis of the percentage of elementary and secondary schools by enrollment size, comparing Nevada to the average of the other five states (Arkansas, Kentucky, Oregon, Tennessee, and Utah):

Under 200 Students:

- Nevada: 21% of its schools have fewer than 200 students.
- Average of Other States: 16% (Range: 11% in Tennessee to 22% in Oregon).

200-399 Students:

- Nevada: 13% of its schools fall in this range.
- Average of Other States: 30% (Range: 16% in Utah to 40% in Oregon).

400-599 Students:

- Nevada: 24% of its schools are in this category.
- Average of Other States: 26% (Range: 21% in Oregon to 29% in Arkansas and Tennessee).

600-799 Students:

- Nevada: 19% of its schools have 600-799 students.
- Average of Other States: 13% (Range: 7% in Oregon to 17% in Utah).

800-999 Students:

- Nevada: 6% of schools fall in this category.
- Average of Other States: 6% (Range: 3% in Oregon to 9% in Utah).

1,000 to 1,499 Students:

- Nevada: 8% of schools have between 1,000 and 1,499 students.
- Average of Other States: 5% (Range: 2% in Arkansas to 9% in Utah).

1,500 to 1,999 Students:

- Nevada: 3% of schools fall into this range.
- Average of Other States: 2% (Range: 0% in Arkansas to 3% in Utah and Tennessee).

2,000 to 2,999 Students:

- Nevada: 4% of its schools are in this size range.
- Average of Other States: 1% (Range: 1% across most states).

3,000 or More Students:

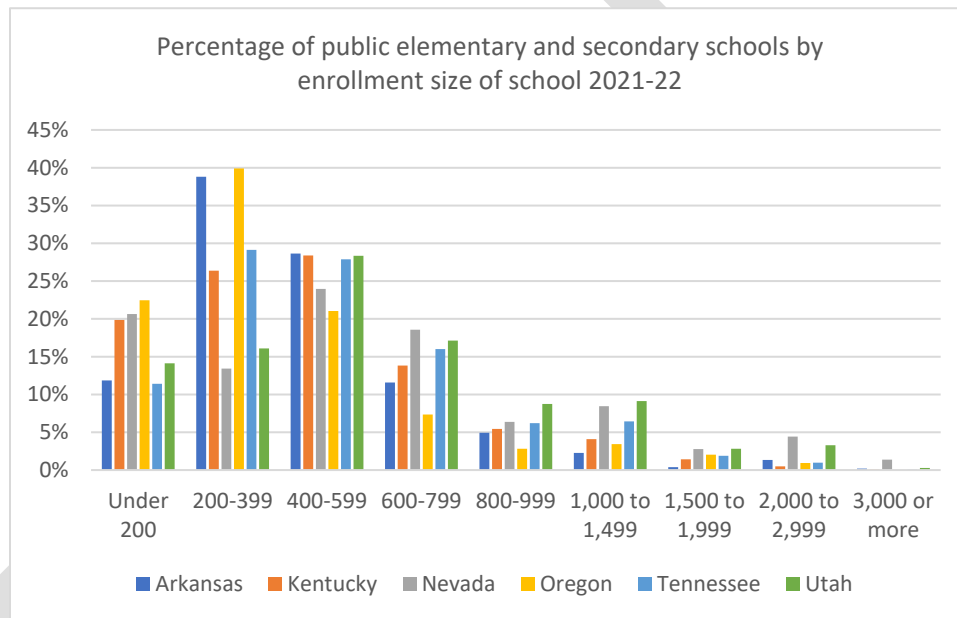
- Nevada: 1% of schools fall into this category.
- Average of Other States: 0% (None of the other states report schools in this range).

Nevada's school size distribution tends toward extremes, with a relatively higher proportion of both very small schools (under 200 students) and very large schools (1,500+ students), compared to the other states. It has fewer schools in the mid-range categories (200-599 students), while Oregon and Arkansas have a stronger concentration in this mid-sized range.

PERCENTAGE OF PUBLIC ELEMENTARY AND SECONDARY SCHOOLS BY ENROLLMENT SIZE OF SCHOOL, 2021-22

State	Under 200	200-399	400-599	600-799	800-999	1,000 to 1,499	1,500 to 1,999	2,000 to 2,999	3,000 or more
Arkansas	12%	39%	29%	12%	5%	2%	0%	1%	0%
Kentucky	20%	26%	28%	14%	5%	4%	1%	1%	0%
Nevada	21%	13%	24%	19%	6%	8%	3%	4%	1%
Oregon	22%	40%	21%	7%	3%	3%	2%	1%	0%
Tennessee	11%	29%	28%	16%	6%	6%	2%	1%	0%
Utah	14%	16%	28%	17%	9%	9%	3%	3%	0%

Source: NCES, 2024.



Enrollment: 1990 to 2022

The table below shows the enrollment changes from 1990 to 2022 across six states—Nevada, Arkansas, Kentucky, Oregon, Tennessee, and Utah. Nevada stands out with the most dramatic growth.

Nevada saw the highest increase in student enrollment, growing from 201,316 students in 1990 to 484,192 in 2022, marking a 141 percent increase. This is far higher than the growth in any other state. Nevada's rapid population growth, particularly in urban centers like Las Vegas, has driven this sharp increase in enrollment. As a result, Nevada has faced challenges in scaling its education infrastructure to accommodate this surge.

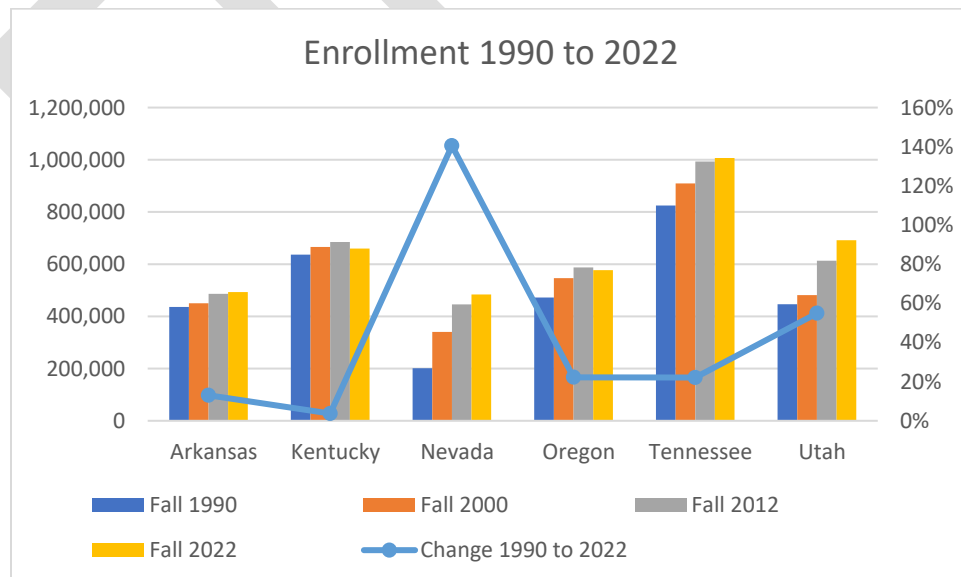
Utah saw the second-highest growth rate after Nevada, with a 55 percent increase from 446,652 in 1990 to 691,906 in 2022. Utah's substantial increase in enrollment reflects its high birth rate and rapid population growth. While not as extreme as Nevada, Utah's growth also presents challenges for education infrastructure.

This data suggests that Nevada and Utah were dealing with rapidly increasing student populations, requiring significant investment in education infrastructure, while Kentucky and Arkansas face more stable growth and fewer demands for large-scale educational expansion.

ENROLLMENT: 1990 TO 2022

State	Fall 1990	Fall 2000	Fall 2012	Fall 2022	% Change 1990 to 2022
Arkansas	436,286	449,959	486,157	493,130	13%
Kentucky	636,401	665,850	685,167	660,029	4%
Nevada	201,316	340,706	445,707	484,192	141%
Oregon	472,394	546,231	587,564	577,335	22%
Tennessee	824,595	909,161	993,496	1,006,752	22%
Utah	446,652	481,485	613,279	691,906	55%

Source: NCES, 2024.



Enrollment: 2018-19 to 2022-23

The COVID-19 pandemic had a profound impact on public education in many ways. The table below shows that from 2018-19 to 2022-23, most states experienced a decrease in student enrollment, with Nevada reflecting a 1.7 percent decline from 492,640 students in 2018-19 to 484,192 in 2022-23. This decline is modest compared to some other states, but still significant, largely influenced by the effects of the COVID-19 pandemic, which disrupted education across the country.

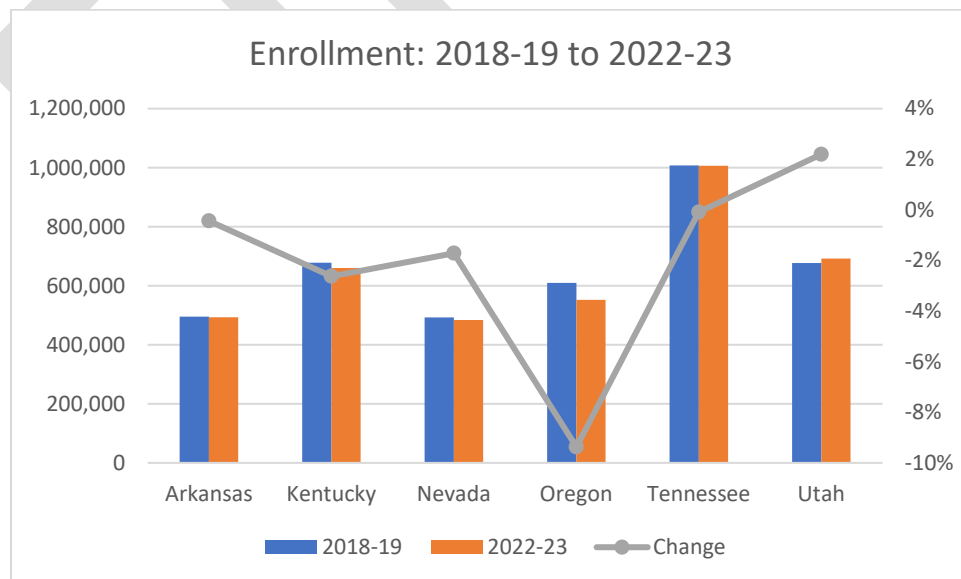
Oregon experienced the most dramatic decline, with a 9.4 percent drop in student enrollment. This significant reduction may reflect broader migration trends, as well as increased homeschooling and private schooling during and after the pandemic, as Oregon experienced some of the most stringent lockdown measures.

The pandemic had varying effects across states, with some seeing significant reductions in student numbers. Nevada's 1.7 percent decline can be attributed to both the immediate impacts of school being shut down and the longer-term effects of families rethinking educational options. Remote learning challenges, economic hardships, and migration patterns during the pandemic all played roles in reshaping public-school enrollment. However, Nevada's decline is more moderate compared to the severe drop in Oregon, and it suggests that Nevada's education system has maintained relative stability in the wake of the pandemic.

ENROLLMENT: 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	495,291	493,130	-0.4%
Kentucky	677,821	660,029	-2.6%
Nevada	492,640	484,192	-1.7%
Oregon	609,507	552,380	-9.4%
Tennessee	1,007,624	1,006,752	-0.1%
Utah	677,031	691,906	2.2%

Source: NCES, 2024.



Projected Enrollment, 2022 to 2031

The table below shows the projected student population for Nevada and the comparison states between 2022 and 2031.

Nevada, while projected to have a 2 percent decline, is in a relatively stable position compared to Oregon and Kentucky, which are expected to see significant decreases in student numbers.

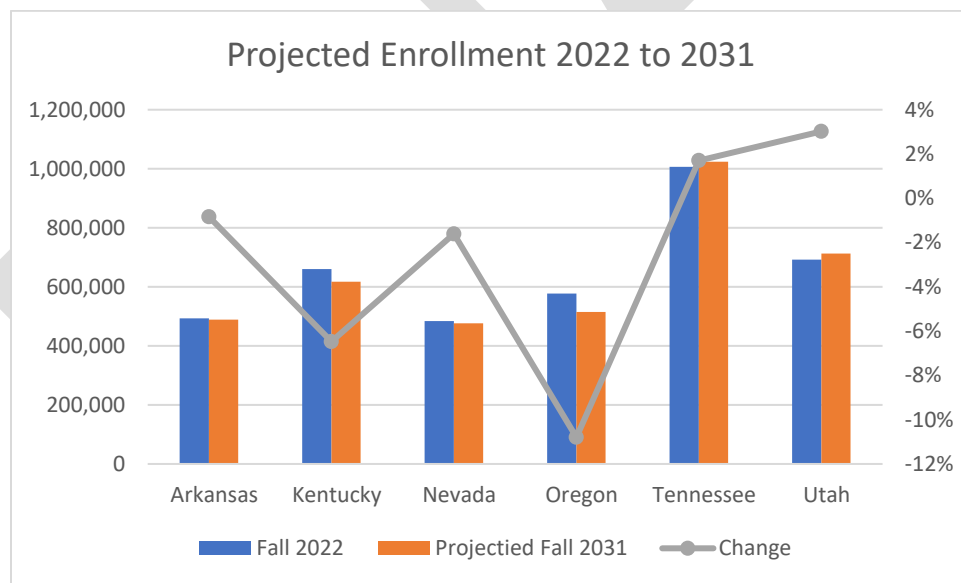
In contrast, Tennessee and Utah are projected to experience growth, with Utah seeing the most substantial increase in enrollment due to its higher birth rates and continued population expansion.

Overall, Nevada's decline reflects a balancing out after previous years of growth, indicating a shift toward a more stable population base.

PROJECTED ENROLLMENT, 2022 TO 2031

State	Fall 2022	Projected Fall 2031	% Change
Arkansas	493,130	489,000	-1%
Kentucky	660,029	617,300	-6%
Nevada	484,192	476,400	-2%
Oregon	577,335	515,000	-11%
Tennessee	1,006,752	1,023,900	2%
Utah	691,906	712,800	3%

Source: NCES, 2024.



Percent Enrollment by Race/Ethnicity, 2022-23

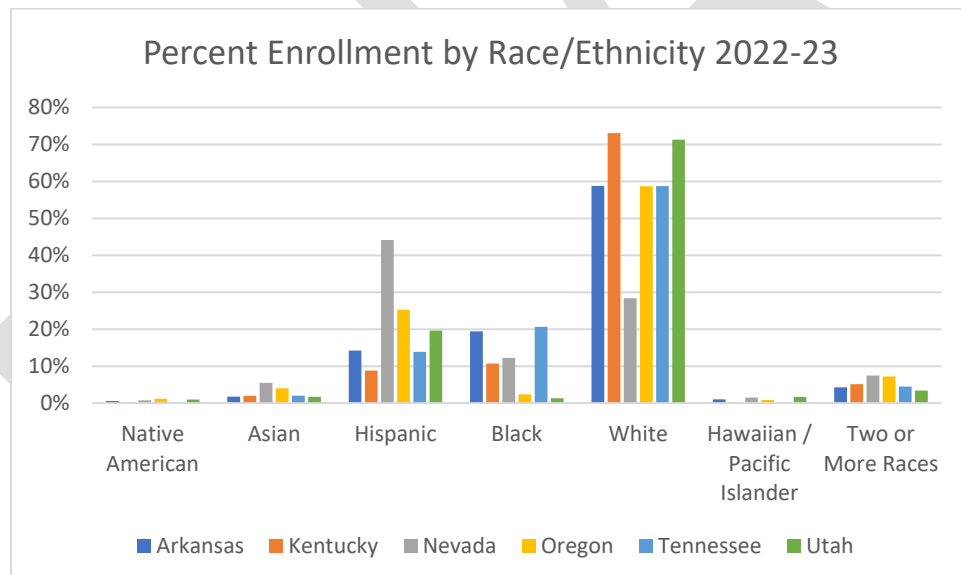
The table below shows the comparison of the percentage of students by race or ethnicity for Nevada and the comparison states for 2022-23.

Nevada's student population is more diverse than the average of the comparison states, with particularly high percentages of Hispanic (44.1%) and Asian (5.5%) students, and a relatively low proportion of White students (28.4%). In contrast, Kentucky and Utah have predominantly White student populations. This diversity in Nevada likely reflects the state's urbanization, particularly in Las Vegas, which attracts a more ethnically diverse population than many other states in the comparison group.

PERCENT ENROLLMENT BY RACE/ETHNICITY, 2022-23

State	Native American	Asian	Hispanic	Black	White	Hawaiian / Pacific Islander	Two or More Races
Arkansas	0.6%	1.8%	14.2%	19.4%	58.8%	1.0%	4.2%
Kentucky	0.1%	2.0%	8.8%	10.7%	73.1%	0.2%	5.1%
Nevada	0.8%	5.5%	44.1%	12.2%	28.4%	1.5%	7.5%
Oregon	1.2%	4.0%	25.3%	2.3%	58.7%	0.8%	7.2%
Tennessee	0.2%	2.0%	13.9%	20.6%	58.7%	0.1%	4.5%
Utah	1.0%	1.7%	19.6%	1.3%	71.3%	1.7%	3.4%

Source: NCES, 2024.



Percentage of Students with Disabilities, 2018-19 to 2022-23

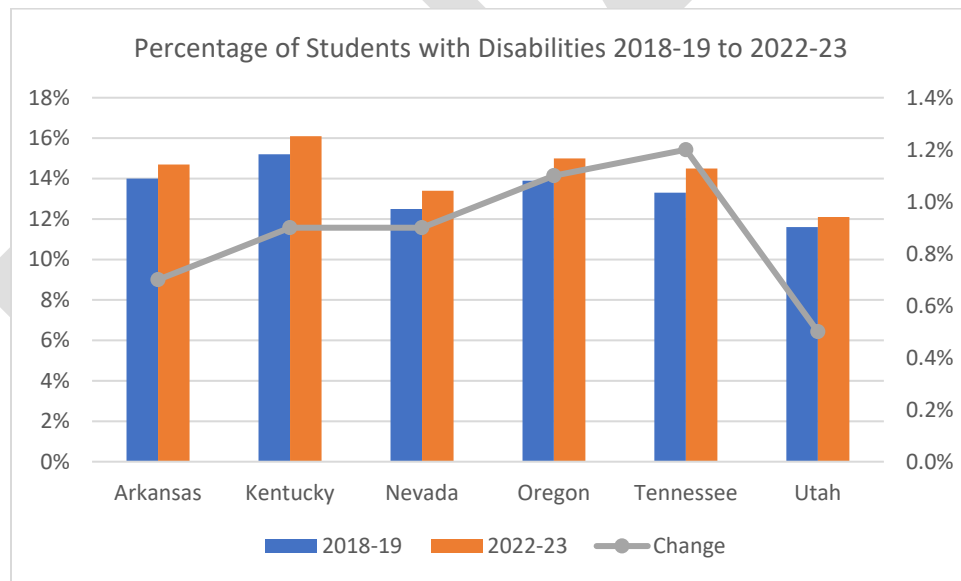
The table below compares the changes in the percentage of students with disabilities pre- and post-pandemic, 2018-19 to 2022-23.

- Nevada's increase of 0.9 percent is identical to Kentucky and slightly higher than Arkansas and Utah.
- Oregon and Tennessee experienced larger increases, with 1.1 percent and 1.2 percent respectively.
- While Nevada's growth is not the most significant, it reflects a broader trend of increasing identification of students with disabilities across states. This may be due to heightened awareness, better diagnostic processes, or increased support systems for students with special needs.

PERCENTAGE OF STUDENTS WITH DISABILITIES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	14.0%	14.7%	0.7%
Kentucky	15.2%	16.1%	0.9%
Nevada	12.5%	13.4%	0.9%
Oregon	13.9%	15.0%	1.1%
Tennessee	13.3%	14.5%	1.2%
Utah	11.6%	12.1%	0.5%

Source: NCES, 2024.



Percentage of English Language Learners, 2018-19 to 2022-23

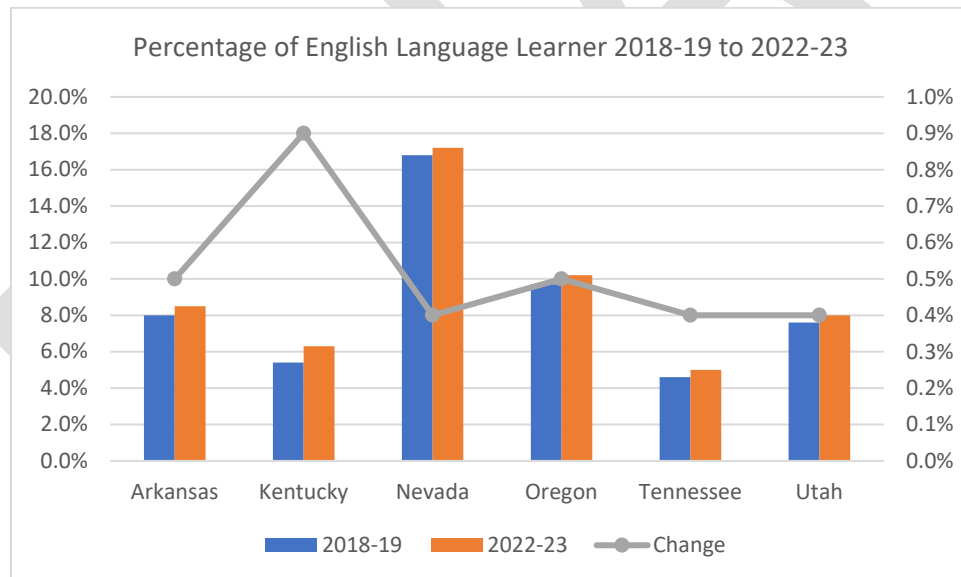
The table below compares the changes in the percentage of English Language Learners (ELL) in each of the six states between 2018-19 and 2022-23.

- Nevada continues to lead with the highest percentage of ELL students at 17.2 percent, reflecting its demographic diversity. Although Nevada's 0.4 percent growth is not the largest, the state still has a much larger base of English learners compared to the others.
- Kentucky experienced the largest growth at 0.9 percent, though its ELL population is still relatively small.
- Arkansas and Oregon saw moderate increases of 0.5 percent, while Tennessee and Utah matched Nevada's 0.4 percent growth.

PERCENTAGE OF ENGLISH LANGUAGE LEARNERS, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	8.0%	8.5%	0.5%
Kentucky	5.4%	6.3%	0.9%
Nevada	16.8%	17.2%	0.4%
Oregon	9.7%	10.2%	0.5%
Tennessee	4.6%	5.0%	0.4%
Utah	7.6%	8.0%	0.4%

Source: NCES, 2024.



Staffing Data

Pupil-Teacher Ratio, 2018-19 to 2022-23

The table below compares the pupil-teacher ratio for the six states between 2018-19 and 2022-23.

- **Nevada's Position:** Nevada consistently had a higher pupil-to-teacher ratio compared to the average of the comparison states. In 2018-19, Nevada's ratio of **21.2** was well above the average of **17.58** for the other states, and in 2022-23, its ratio of **21.0** also remained higher than the comparison state average of **16.68**.

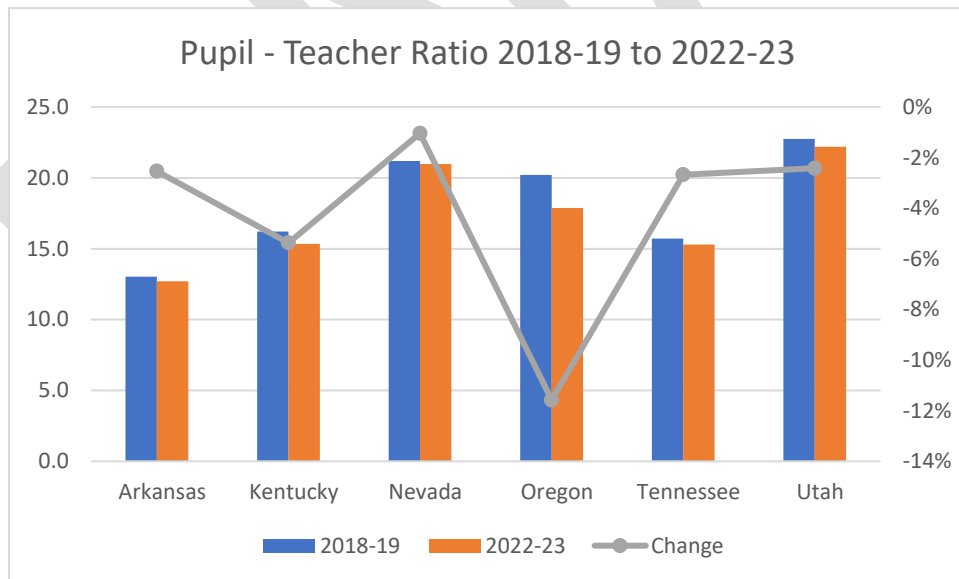
- **Change Comparison:** Nevada's **1.0 percent** reduction is notably smaller compared to the **5.12 percent** average decrease for the comparison states. This suggests that while comparison states have made more significant improvements in lowering their pupil-to-teacher ratios, Nevada has only managed a minimal reduction.
- **Highest Ratio:** Nevada's pupil-to-teacher ratio remains one of the highest, with only Utah surpassing it slightly in both periods (Utah's ratio was **22.8** in 2018-19 and **22.2** in 2022-23).
- **Oregon's Significant Change:** Among the comparison states, Oregon showed the largest improvement, with an **11.6 percent** reduction in its pupil-to-teacher ratio, moving from **20.2** to **17.9**, making Nevada stand out even more in terms of its higher ratios.

Nevada has not made as much progress in reducing its pupil-to-teacher ratio compared to the other states in the dataset. Its reduction of 1.0 percent is significantly lower than the average 5.12 percent decrease, indicating that efforts to reduce class sizes in Nevada may not be as aggressive or effective as those in other states. Nevada continues to maintain one of the highest ratios, which could point to challenges in reducing class sizes, despite national trends moving toward smaller classrooms.

PUPIL-TEACHER RATIO, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	13.0	12.7	-2.5%
Kentucky	16.2	15.3	-5.4%
Nevada	21.2	21.0	-1.0%
Oregon	20.2	17.9	-11.6%
Tennessee	15.7	15.3	-2.7%
Utah	22.8	22.2	-2.4%

Source: NCES, 2024.



Pupils-Per-Full-Time Equivalent (FTE) Staff, 2018-19 to 2022-23

The table below compares the pupil-staff member ratio for the six states for 2018-19 to 2022-23.

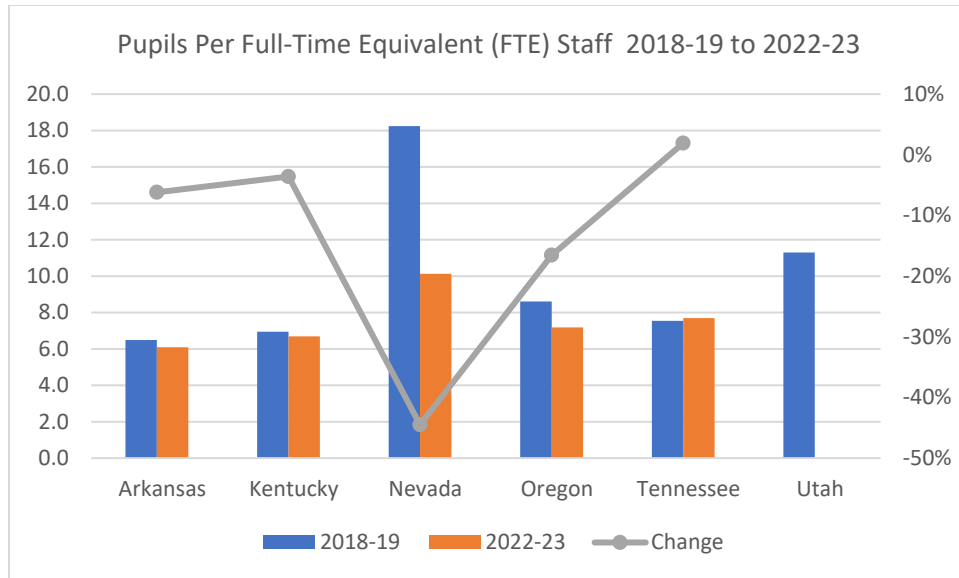
- **Nevada's Significant Drop:** Nevada's **44.5 percent** reduction in the number of pupils per FTE staff is substantially larger than the average **6.1 percent** reduction seen in the comparison states. This suggests a dramatic effort in Nevada to hire more staff, significantly improving the pupil-to-staff ratio.
- **Nevada's Initial High Ratio:** In 2018-19, Nevada had an unusually high ratio of **18.2** pupils per FTE staff, indicating a much larger workload for teachers and staff compared to other states, which had ratios between **6.5** and **8.6**.
- **Improvement:** By 2022-23, Nevada's ratio of **10.1** pupils per FTE staff was still higher than the average of **6.93** for the other states but represents a substantial improvement over its prior position.
- **Comparison States' Moderate Changes:** The comparison states show relatively small reductions in their ratios, with the most significant change seen in Oregon, where the ratio dropped from **8.6** to **7.2** (a **-16.5%** change). Tennessee is the only state with an increase, showing a **1.9 percent** rise in pupils per FTE staff, from **7.5** to **7.7**.
- **Nevada's Overall Context:** Nevada's substantial improvement can be linked to its aggressive increase in FTE staffing levels, as seen in earlier data. Despite this progress, Nevada's ratio remains higher than most other states, though it is much closer to parity than it was in 2018-19.

Nevada's pupils per FTE staff ratio have dropped dramatically, reflecting a 44.5% improvement, far exceeding the average 6.1% decrease seen in comparison states. This indicates that Nevada has made significant efforts to reduce class sizes and pupil loads on staff, although the state's ratio remains higher than the average of comparison states. Nevada's position in 2022-23 is a marked improvement from 2018-19, when it had an exceptionally high ratio of pupils per staff member, but it still suggests that further efforts may be needed to reach the staffing levels seen in Arkansas and Kentucky.

PUPILS-PER-FULL-TIME EQUIVALENT (FTE) STAFF, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	6.5	6.1	-6.2%
Kentucky	6.9	6.7	-3.6%
Nevada	18.2	10.1	-44.5%
Oregon	8.6	7.2	-16.5%
Tennessee	7.5	7.7	1.9%
Utah	11.3	N/A	

Source: NCES, 2024.



Pupils-Per-Paraprofessional/Instructional Aide, 2018-19 to 2022-23

The table below compares the number of students per paraprofessional or aide for the six states for 2018-19 to 2022-23.

- Nevada's Dramatic Improvement:** Nevada made the most significant reduction in the number of pupils per paraprofessional, with a **29.1 percent** decrease. However, even after this reduction, Nevada's ratio of **69** pupils per paraprofessional in 2022-23 remains higher than comparison states except for Tennessee.
- Starting Point:** Nevada's initial ratio in 2018-19 was **98** pupils per paraprofessional, considerably higher than comparison states. This extreme difference suggests that Nevada had significant room for improvement, which it achieved by reducing the number of pupils per paraprofessional by nearly a third.
- Comparison States' Moderate Improvements:** Some of comparison states, like Oregon and Arkansas, showed more moderate improvements, with Oregon's **11.1 percent** reduction being the next highest after Nevada. Arkansas and Kentucky also improved, though to a lesser degree.
- Tennessee's Unique Position:** Tennessee is an outlier with a **1.6 percent** increase in the number of pupils per paraprofessional, meaning it has slightly worsened in terms of staff-to-pupil ratios. This contrasts sharply with Nevada's progress and the trend of improvement seen in the other comparison states.
- Remaining High Ratios:** Despite the improvement, Nevada still lags behind Oregon and Arkansas in terms of its pupil-to-paraprofessional ratio, indicating that while Nevada has made significant strides, it may still need to make further improvements to match national averages.

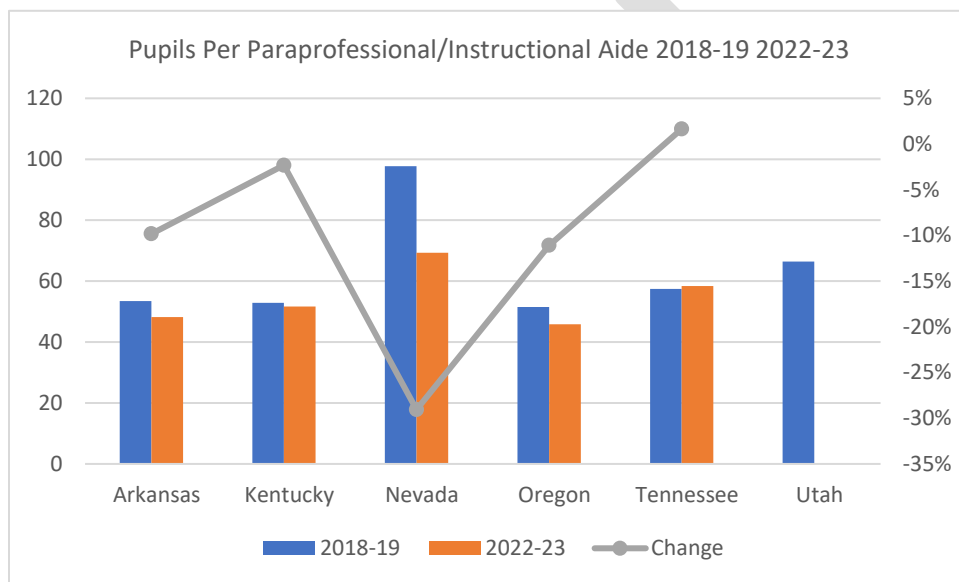
Nevada's 29.1 percent reduction in the number of pupils per paraprofessional/instructional aide marks significant progress, by far the largest improvement among the states compared. However, despite this progress, Nevada's ratio of 69 pupils per aide in 2022-23 remains higher than most of the comparison states. This suggests that while the state is moving in the right direction, more work may be needed to bring its staffing ratios in line with the national averages. Oregon and Arkansas have seen more

moderate but still significant improvements, while Tennessee stands out with a slight increase in its pupil-to-paraprofessional ratio.

PUPILS-PER-PARAPROFESIONAL/INSTRUCTIONAL AIDE, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	53	48	-9.8%
Kentucky	53	52	-2.3%
Nevada	98	69	-29.1%
Oregon	52	46	-11.1%
Tennessee	57	58	1.6%
Utah	66	N/A	

Sources: NCES, 2024, & NDE NRS Annual Report FY 19.



Pupils-Per-Instructional Coordinator, 2018-19 to 2022-23

The table below shows the comparison of the six states for pupil-instructional coordinator ratio for 2018-19 to 2022-23.

- Nevada's Major Improvement:** Nevada achieved the most significant reduction in the number of pupils per instructional coordinator, with a **69.7 percent** decrease. While Nevada initially had the highest ratio in 2018-19, it brought this down drastically by 2022-23, moving from **827** to **250** pupils per coordinator.
- Initial High Ratios:** Nevada and Oregon had notably high ratios in 2018-19, with Nevada at **827** and Oregon at **1,098**. Both states made significant strides to reduce these ratios, but Oregon remained the highest in 2022-23 with **713** pupils per coordinator.
- Arkansas' Strong Performance:** Arkansas saw a significant reduction, decreasing by **50.8 percent**. With a ratio of **229** in 2022-23, Arkansas now has one of the lowest pupil-to-coordinator ratios, following Nevada's improvement.

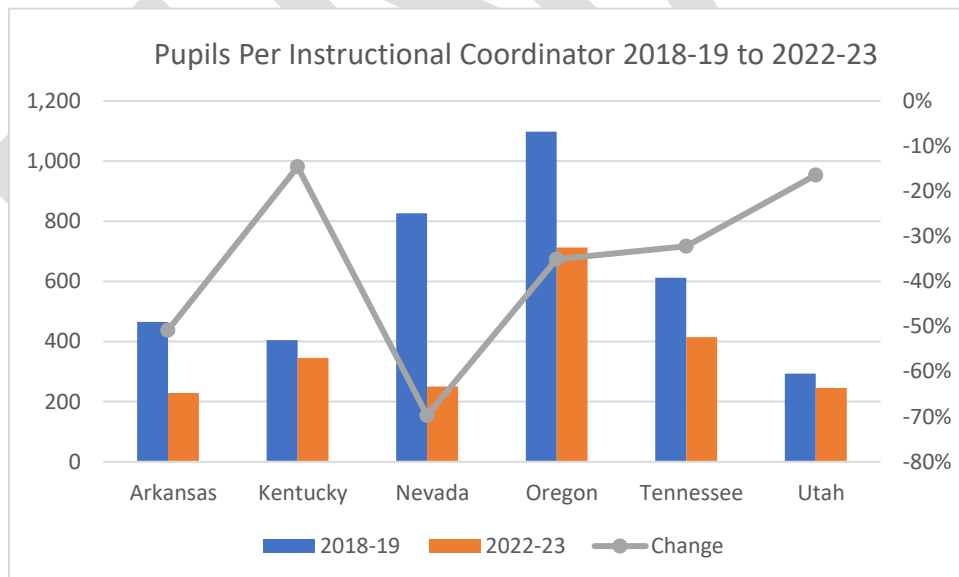
- **Tennessee's Moderate Improvement:** Tennessee made a significant reduction of **32.2 percent**, but it still lags behind Arkansas, Kentucky, and Utah in terms of having a higher pupil-to-coordinator ratio.
- **Utah's Already Low Ratio:** Utah started with one of the lowest ratios and continued to improve, showing a **16.4 percent** reduction. With **245** pupils per instructional coordinator in 2022-23, Utah remains among the states with the lowest ratios, suggesting a strong emphasis on providing adequate instructional coordination.

Nevada's 69.7 percent reduction in the number of pupils per instructional coordinator represents the most substantial improvement among the states. This drop suggests significant investments in hiring more instructional coordinators to balance the workload. While Nevada made remarkable progress, Arkansas and Oregon also showed significant reductions, with Arkansas achieving a 50.8 percent reduction and Oregon a 35.1 percent reduction. Utah continues to maintain one of the lowest ratios, while Tennessee, despite improvements, still has a relatively high pupil-to-coordinator ratio compared to Arkansas and Nevada.

PUPILS-PER-INSTRUCTIONAL COORDINATOR, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	465	229	-50.8%
Kentucky	405	346	-14.6%
Nevada	827	250	-69.7%
Oregon	1,098	713	-35.1%
Tennessee	612	415	-32.2%
Utah	293	245	-16.4%

Source: NCES, 2024.



Pupils-Per-School Counselor, 2018-19 to 2022-23

The table below compares the changes in student-counselor ratios for the six states for 2018-19 to 2022-23.

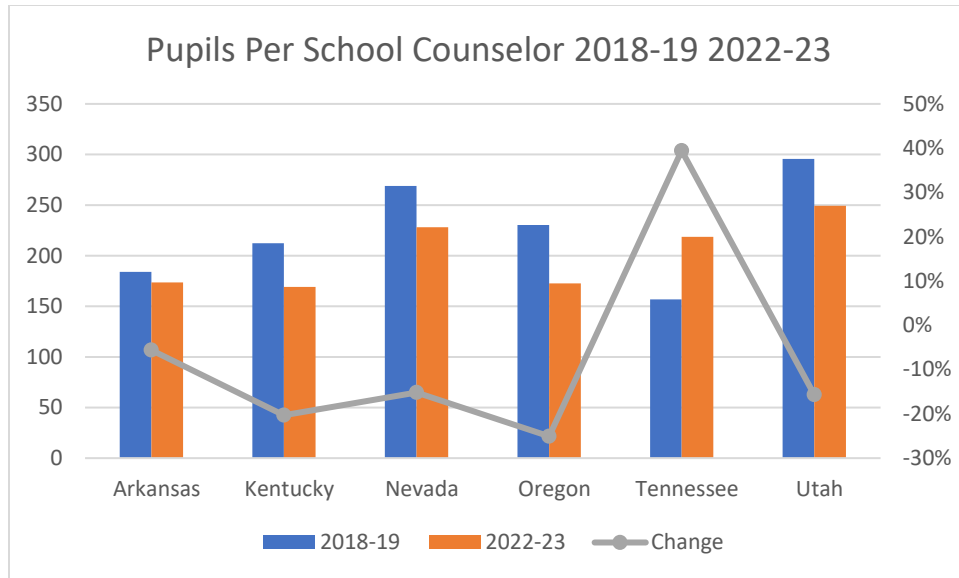
- **Nevada's Substantial Improvement:** Nevada's **15.2 percent** reduction reflects a considerable effort to improve access to school counselors, reducing the counselor workload. While its ratio of **228** pupils per counselor is better than Utah's **249**, it remains higher than Arkansas, Kentucky, and Oregon.
- **Oregon's Significant Progress:** Oregon saw the most dramatic reduction, with a **25.1 percent** improvement, lowering its ratio from **230** to **173**. This indicates a major commitment to reducing counselor workloads, leading to one of the lowest ratios in 2022-23.
- **Tennessee's Increase:** Tennessee is an outlier, with a **39.4%** increase in the ratio of pupils per counselor. The ratio increased from **157** to **219**, suggesting challenges in counselor staffing or rising enrollment. This reversal could impact the quality of student support in Tennessee schools.
- **Arkansas and Kentucky's Steady Improvements:** Arkansas and Kentucky both had significant reductions in their pupil-to-counselor ratios. Kentucky's **20.3 percent** decrease brings it to a low ratio of **169**, making it one of the most favorable states for counselor availability, while Arkansas also maintained a consistently low ratio.
- **Utah's High Ratio:** Despite improvements, Utah continues to have the highest pupil-to-counselor ratio at **249** in 2022-23, though it reduced this by **15.7 percent** from 2018-19. This suggests that while progress has been made, Utah still has considerable work to do to bring its ratio down to the levels of other states.

Nevada's 15.2 percent reduction in the number of pupils per school counselor reflects significant progress, though the state still has one of the higher ratios compared to others like Oregon and Kentucky. Oregon's 25.1 percent decrease leads the way in improvements, while Tennessee stands out with a troubling 39.4 percent increase, suggesting potential issues with counselor staffing. Arkansas and Kentucky continue to maintain relatively low ratios, with steady improvements. Utah, despite improvements, still lags behind in reducing its high counselor workload. Nevada's efforts show progress, but further reductions would be needed to match the more favorable ratios seen in Oregon and Kentucky.

PUPILS-PER-SCHOOL COUNSELOR, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	184	174	-5.6%
Kentucky	212	169	-20.3%
Nevada	269	228	-15.2%
Oregon	230	173	-25.1%
Tennessee	157	219	39.4%
Utah	296	249	-15.7%

Source: NCES, 2024.



Pupils-Per-Librarian/Media Specialist, 2018-19 to 22-23

The table below compares the student to Librarian-Media Specialist for the six states for 2018-19 to 2022-23.

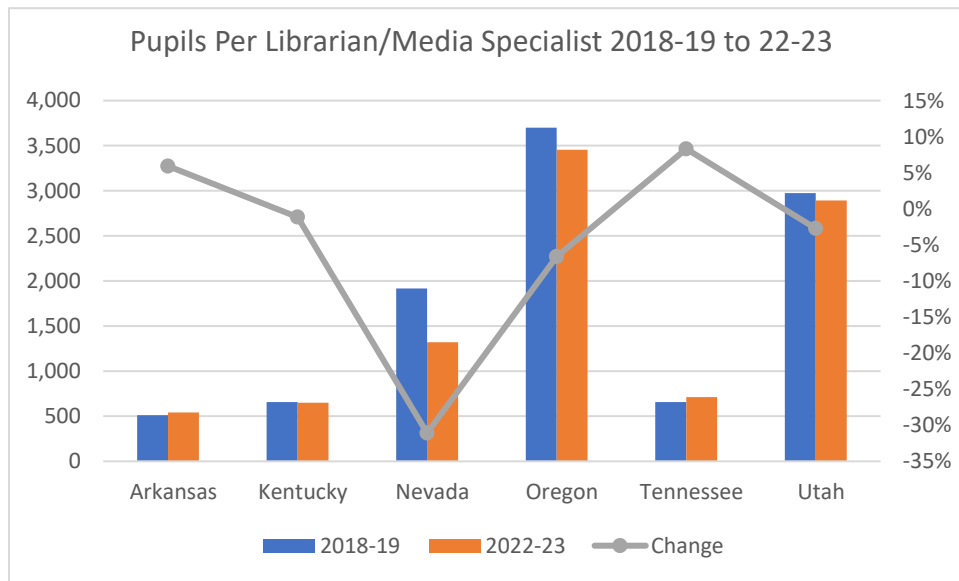
- **Nevada's Significant Improvement:** Nevada's 31.1 percent reduction is by far the most significant among all the comparison states. The drop from 1,917 to 1,321 pupils per librarian suggests a major effort to increase staffing and provide better access to library services. However, despite this large improvement, Nevada's ratio still remains higher than Arkansas, Kentucky, and Tennessee, indicating there is more room for improvement.
- **Oregon's High Ratio:** Despite a 6.6 percent reduction, Oregon continues to have the highest ratio of pupils per librarian at 3,455 in 2022-23. This highlights a persistent issue in Oregon where students have far less access to librarians compared to the comparison states.
- **Tennessee's Worsening Trend:** Tennessee's ratio increased by 8.3 percent, moving from 658 to 712 pupils per librarian. This worsening trend suggests that Tennessee has either reduced its library staff or experienced significant student growth without corresponding increases in staffing, which could limit access to library resources.

Nevada made the most substantial progress in reducing its pupils-per-librarian ratio, showing a strong commitment to improving student access to librarians and media specialists, though the state still has a higher ratio than many comparison states. Oregon continues to face challenges with the highest ratio, despite slight improvements. Tennessee's increase in its ratio raises concerns about access to librarians, while Arkansas, Kentucky, and Utah have seen smaller changes but maintained either stable or modestly improved ratios. Overall, Nevada's large reduction is commendable, though further efforts will be needed to bring its ratio closer to those seen in Arkansas and Kentucky.

PUPILS-PER-LIBRARIAN/MEDIA SPECIALIST, 2018-19 TO 22-23

State	2018-19	2022-23	% Change
Arkansas	512	542	5.9%
Kentucky	658	650	-1.2%
Nevada	1,917	1,321	-31.1%
Oregon	3,700	3,455	-6.6%
Tennessee	658	712	8.3%
Utah	2,973	2,892	-2.7%

Source: NCES, 2024.



Pupils-Per-Student Support Services Staff, 2018-19 to 2022-23

The table below compares the ratio of students to student support services staff for the six states for 2018-19 to 2022-23.

- Nevada's Significant Improvement:** Nevada's **45.9 percent** reduction is by far the most significant among all the comparison states. This improvement indicates a strong commitment to addressing staffing issues, though the state still has one of the highest ratios in 2022-23.
- Stable Arkansas:** Arkansas's ratio remained virtually unchanged, which suggests that the state already had sufficient staffing levels in place. With only **66** pupils per staff member, Arkansas is in a very favorable position compared to comparison states.
- Modest Improvements in Kentucky and Oregon:** Both Kentucky and Oregon made moderate progress in reducing their ratios by **6.1 percent** and **10.1 percent**, respectively. These improvements suggest incremental efforts to improve staffing and better manage student caseloads.
- Tennessee's Strong Progress:** Tennessee saw a **23.6 percent** reduction, making significant strides in improving its ratio. This suggests a strong focus on hiring more staff or optimizing staffing in ways that have had a meaningful impact.

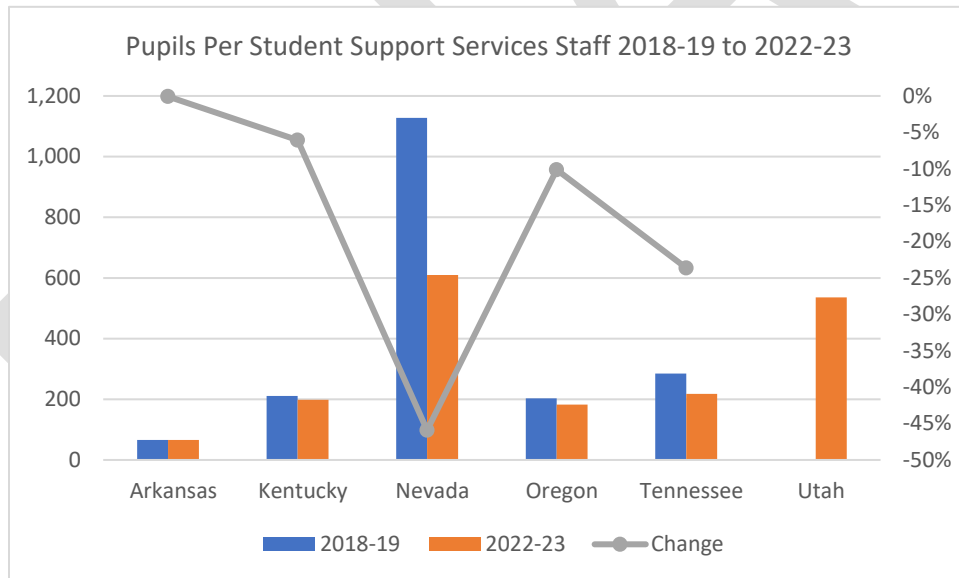
- **Utah's High Ratio:** With a ratio of **536** pupils per staff member in 2022-23, Utah is positioned between Nevada and the other comparison states. The lack of earlier data makes it difficult to assess trends, but Utah's current ratio suggests that the state has room for improvement.

Nevada has made the most dramatic improvement, with a 45.9 percent reduction in its pupil-to-staff ratio, though it still has a relatively high ratio compared to Arkansas, Kentucky, and Oregon. Arkansas, with its stable and low ratio, is in the most favorable position. Kentucky, Oregon, and Tennessee have all made solid improvements, with Tennessee seeing the second-largest reduction after Nevada. Utah, with no prior data for comparison, still has a high ratio and may need to prioritize further improvements. Nevada's progress is impressive, but additional efforts are likely needed to continue reducing its high pupil-to-staff ratio.

PUPILS-PER-STUDENT SUPPORT SERVICES STAFF, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	66	66	-0.1%
Kentucky	211	198	-6.1%
Nevada	1,128	610	-45.9%
Oregon	203	182	-10.1%
Tennessee	285	218	-23.6%
Utah	NA	536	

Source: NCES, 2024.



Pupils-Per-LEA Administrators, 2018-19 to 2022-23

The table below compares the student to LEA Administrator ratio for 2018-19 to 2022-23.

- **Nevada's Concerning Trend:** Nevada's **27.1 percent** increase in the number of pupils per LEA administrator stands out as one of the more concerning trends in the table. With more pupils under each administrator's responsibility, Nevada may face challenges in maintaining adequate educational oversight and support. This could impact the quality of leadership and responsiveness within the state's schools.

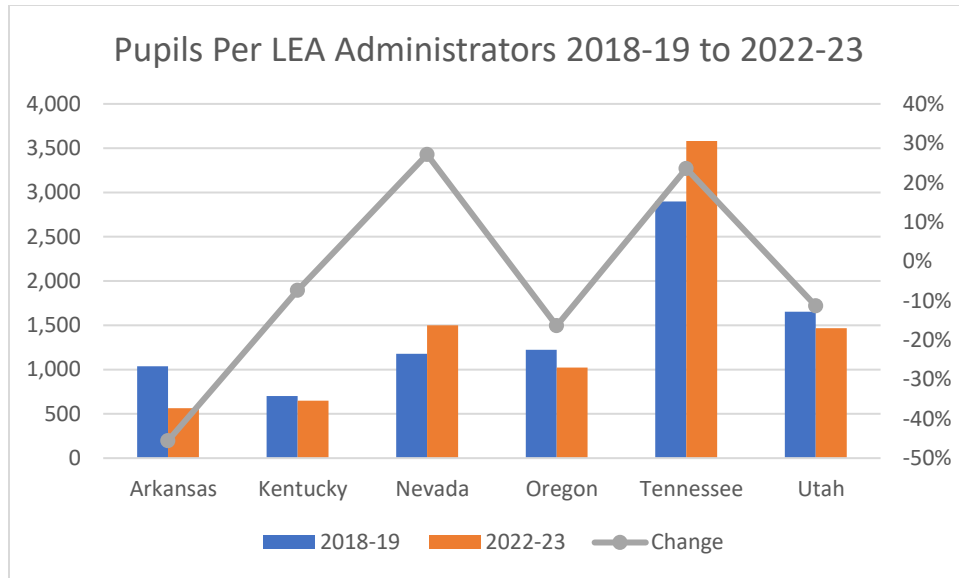
- **Arkansas's Major Improvement:** Arkansas leads in administrative capacity improvements, with a significant **45.6 percent** reduction in the ratio. This reflects a strong effort to ensure that administrators can effectively manage their responsibilities by reducing their workload.
- **Tennessee's Worsening Ratio:** Tennessee saw a substantial **23.6 percent** increase in its ratio, going from **2,898** to **3,581** pupils per LEA administrator. This is a significant concern, as it suggests that Tennessee's administrative capacity is being stretched thin, which could affect school management and operational efficiency.
- **Oregon's Moderate Improvement:** Oregon's **16.4 percent** reduction represents a positive trend, though the state still has a relatively high ratio. Oregon's efforts to decrease the number of pupils per administrator are commendable but could be expanded further.
- **Utah's Modest Progress:** Utah made some improvement with an **11.3 percent** reduction, but its ratio of **1,467** pupils per LEA administrator in 2022-23 is still on the higher end. This suggests the state is moving in the right direction but may need to accelerate its efforts.
- **Kentucky's Stability:** Kentucky, with a low ratio of **650** pupils per administrator in 2022-23, remains one of the states with the most manageable administrative workloads. Its **7.4 percent** reduction shows steady progress in ensuring that its LEA administrators are not overburdened.

Nevada's 27.1 percent increase in pupils per LEA administrator is a red flag, indicating growing pressures on administrative capacity in the state. In contrast, Arkansas and Oregon have made significant improvements, with Arkansas leading the way by nearly halving its ratio. Tennessee's situation is particularly concerning, as it continues to see an increase in its already high ratio, while Utah and Kentucky have shown moderate to modest improvements. Nevada's rising ratio suggests that the state needs to prioritize administrative staffing to better manage its growing student population and ensure effective school leadership.

PUPILS-PER-LEA ADMINISTRATORS, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	1,037	564	-45.6%
Kentucky	701	650	-7.4%
Nevada	1,179	1,499	27.1%
Oregon	1,223	1,023	-16.4%
Tennessee	2,898	3,581	23.6%
Utah	1,654	1,467	-11.3%

Source: NCES, 2024, & NDE NRS Annual Reports, 2019 and 2022.



Pupils-Per-School Administrators, 2018-19 to 2022-23

The table below compares the ratio of students to school administrators for 2018-19 to 2022-23.

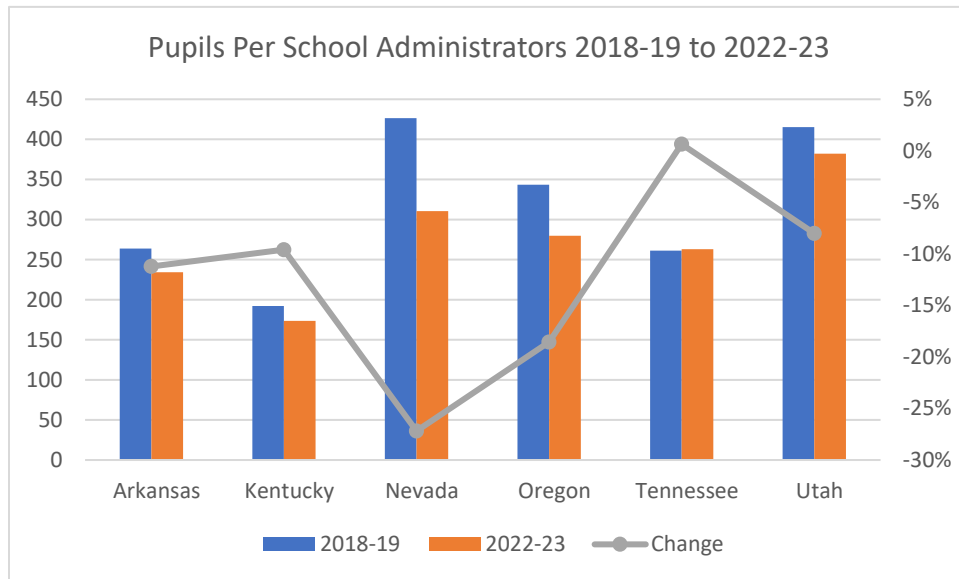
- Nevada's Significant Progress:** Nevada made the largest improvement, reducing its pupil-to-administrator ratio by **27.2 percent**, which is a notable effort in addressing administrative capacity. Despite this improvement, Nevada's ratio of **311** pupils per administrator is still higher than most states, though it is much closer to the levels of Oregon and Utah after this progress.
- Oregon's Strong Improvement:** Oregon also saw a significant reduction of **18.6 percent**, moving its ratio from **343** to **280**. Oregon's focus on reducing administrative workloads is evident, though it still has room for further improvement compared to Kentucky and Arkansas.
- Arkansas and Kentucky's Steady Progress:** Both states maintained low ratios to begin with and made further improvements, with **11.2 percent** and **9.6 percent** reductions, respectively. These states have consistently managed their administrative staffing well, resulting in low ratios relative to the others.
- Tennessee's Stagnation:** Tennessee's **0.6 percent** increase in the ratio indicates no real change in its administrative staffing relative to its student population. While Tennessee started with a relatively favorable ratio, the lack of improvement could indicate a potential challenge in keeping up with student growth or administrative demands.
- Utah's Modest Improvement:** Utah made a modest **8.0 percent** improvement, reducing its ratio from **415** to **382**. This is a positive trend, but Utah still has a relatively high ratio, indicating there is room for further reduction in pupil-to-administrator workloads.

Nevada made the most significant progress, with a 27.2 percent reduction in its pupils-per-school-administrator ratio. This improvement reflects a concerted effort to better support schools with more school-level administrators. Despite this progress, Nevada still has a higher ratio compared to Arkansas, Kentucky, and Oregon, indicating that further improvements may still be needed. Oregon also made notable gains, while Tennessee saw no meaningful change, and Utah made only modest improvements. Arkansas and Kentucky, which already had lower ratios, continue to manage their administrative staffing well.

PUPILS-PER-SCHOOL ADMINISTRATORS, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	264	234	-11.2%
Kentucky	192	174	-9.6%
Nevada	427	311	-27.2%
Oregon	343	280	-18.6%
Tennessee	261	263	0.6%
Utah	415	382	-8.0%

Source: NCES, 2024.



Number of Teachers as a Percentage of All School Staff, 2022

The table below provides the number of teaching and overall staff for 2022 and compares the proportion of teachers to the entire staff in each state.

- Nevada's Strong Teacher Representation:** With **48.3 percent** of its school staff being teachers, Nevada falls in the upper-middle range compared to the comparison states. While it does not have the highest percentage (which belongs to Tennessee), it is still a substantial proportion, indicating that nearly half of the school staff are directly involved in instruction.
- Tennessee's High Focus on Teachers:** Tennessee has the highest percentage of teachers, with over half (**50.3%**) of its school staff being in teaching positions. This suggests that Tennessee places a very strong emphasis on ensuring that a large portion of its workforce is focused on classroom instruction.
- Oregon's Lower Teacher Ratio:** Oregon stands out for having the lowest percentage of teachers, with only **40.2 percent** of its staff in teaching roles. This may indicate a greater reliance on support staff or administrative roles, possibly reflecting a different staffing strategy compared to Tennessee or Nevada.

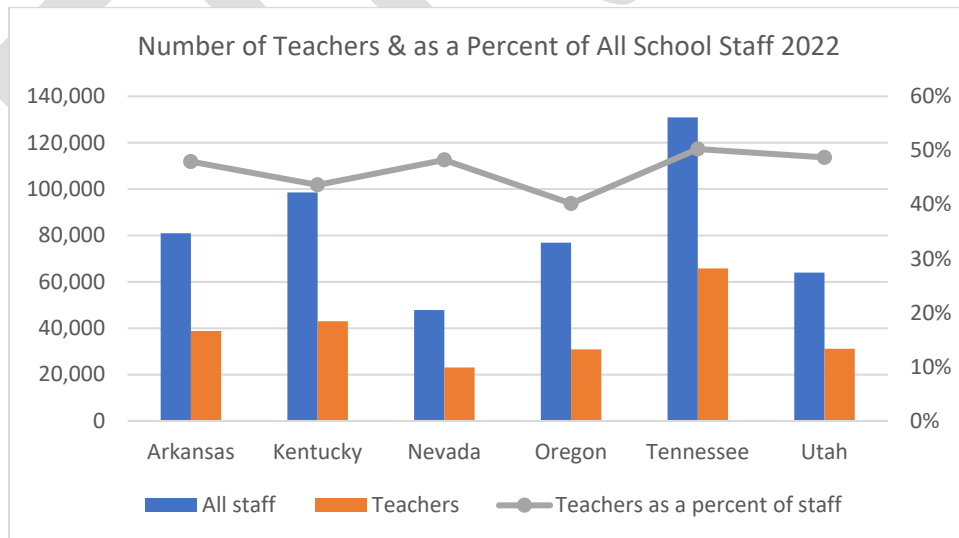
- **Arkansas and Utah’s Similarities to Nevada:** Both Arkansas and Utah have similar percentages of teachers relative to Nevada, with **47.9 percent** and **48.7 percent**, respectively. This suggests that these states share similar staffing models, with a near-even split between teachers and other school staff.
- **Kentucky’s Balance:** Kentucky, with **43.6 percent** of its staff being teachers, has a slightly lower ratio of teaching staff compared to Nevada and Utah. This may suggest a more balanced approach with a stronger emphasis on non-teaching roles relative to the other comparison states.

Nevada ranks near the top in terms of the proportion of teachers within its school staff, with 48.3 percent of its workforce being educators. This positions Nevada in line with Arkansas and Utah but below Tennessee, which has the highest percentage of teachers. Oregon stands out for its notably lower percentage of teachers, suggesting a different staffing emphasis. Nevada’s high percentage reflects a strong focus on ensuring a large portion of school staff is dedicated to teaching roles, though there may still be room to optimize the balance between teaching and support roles to improve educational outcomes further.

NUMBER OF TEACHERS & AS A PERCENTAGE OF ALL SCHOOL STAFF 2022

State Name	All staff	Teachers	Teachers as a percentage of staff
Arkansas	80,963	38,815	47.9%
Kentucky	98,580	43,023	43.6%
Nevada	47,824	23,076	48.3%
Oregon	76,889	30,906	40.2%
Tennessee	130,887	65,781	50.3%
Utah	63,974	31,164	48.7%

Source: NCES 2024



National Assessment of Educational Progress (NAEP)

NAEP Math / Reading Grade 4 All Students, 2019 to 2022

The table below compares the NAEP scale scores for Nevada to the comparison states for 2019 to 2022.

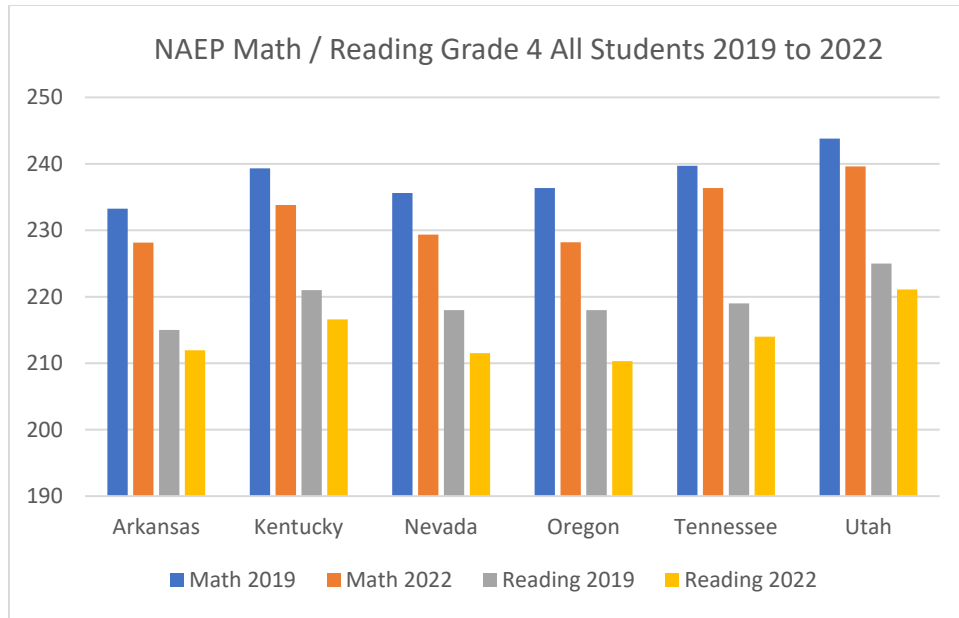
- **Nevada's Steeper Decline:** Nevada's 6-point drop in both Math and Reading is notable. While Nevada's Math decline matches Kentucky's, its Reading drop was among the higher ones, suggesting that Nevada's students faced challenges in literacy at a time when Arkansas and Utah were more stable.
- **Oregon's Challenges:** Oregon had the most significant declines in both Math and Reading, with 8-point drops in both subjects. This suggests that Oregon's students faced significant setbacks in academic achievement during the 2019-2022 period.
- **Utah's Resilience:** Utah had the smallest declines, with only 4-point drops in both Math and Reading. This resilience indicates that Utah's educational system was better able to weather the disruptions of the pandemic than the other comparison states.
- **Tennessee's Stable Math Performance:** Tennessee experienced the smallest Math decline at 3 points, suggesting that the state may have implemented effective measures to mitigate learning loss in mathematics. However, its 5-point drop in Reading shows that literacy challenges were still present.
- **Arkansas and Kentucky's Moderate Declines:** Both states saw moderate declines, with Arkansas performing better in Reading than Math, and Kentucky seeing a balanced but slightly larger decline in both areas. These states seem to have maintained a relatively stable academic performance compared to Nevada and Oregon.

Nevada experienced a notable 6-point drop in both Math and Reading, positioning it in the middle of the states analyzed. Although this decline is not as severe as Oregon's, it is still significant, especially in Reading, where Arkansas and Utah fared better. The data suggests that Nevada faced considerable academic challenges during this period, and additional focus may be needed to address literacy and math recovery efforts moving forward. Utah's resilience and Tennessee's stable Math performance offer potential models for strategies to mitigate learning loss in future crises.

NAEP MATH / READING GRADE 4 ALL STUDENTS, 2019 TO 2022

State	Math		Reading		Math Change	Reading Change
	2019	2022	2019	2022		
Arkansas	233	228	215	212	-5.1	-3.0
Kentucky	239	234	221	217	-5.5	-4.4
Nevada	236	229	218	212	-6.3	-6.5
Oregon	236	228	218	210	-8.2	-7.7
Tennessee	240	236	219	214	-3.3	-5.0
Utah	244	240	225	221	-4.2	-3.9

Source: NCES, 2024.



NAEP Math / Reading Grade 4 Eligible National School Lunch Program, 2019 to 2022

The table below shows the NAEP scales scores in reading and math for students eligible for free/reduced lunches in both 2019 and 2022 for the six states.

- Nevada's Relatively Stable Performance:** Nevada's 4-point decline in Math and 3-point decline in Reading are modest compared to the comparison states. Nevada performed better than Arkansas, Kentucky, Tennessee, and Utah in terms of minimizing academic loss, particularly in Reading where the decline was smaller than the national average.
- Oregon's Unique Improvement:** Oregon stands out as the only state that saw improvements in both Math and Reading scores for students eligible for the National School Lunch Program. This suggests that Oregon implemented successful interventions or strategies to support its lower-income students during this challenging period.
- Utah's Steep Decline:** Utah experienced the largest declines in both subjects, with a 10-point drop in Math and a 9-point decrease in Reading. This significant drop points to severe challenges for Utah's lower-income students, indicating that recovery efforts may need to be more intensive in this state.
- Kentucky and Arkansas' Larger Declines:** Both Kentucky and Arkansas saw relatively larger drops in both subjects, with Kentucky experiencing a 7-point decline in Math and 6 in Reading. These drops were more severe than Nevada's, signaling that students in these states may have faced greater obstacles in maintaining their academic progress.
- Tennessee's Consistent Decline:** Tennessee experienced similar drops in both subjects, declining by 5 points in Math and 4 points in Reading, suggesting a balanced but consistent decline in academic performance for students eligible for the National School Lunch Program.

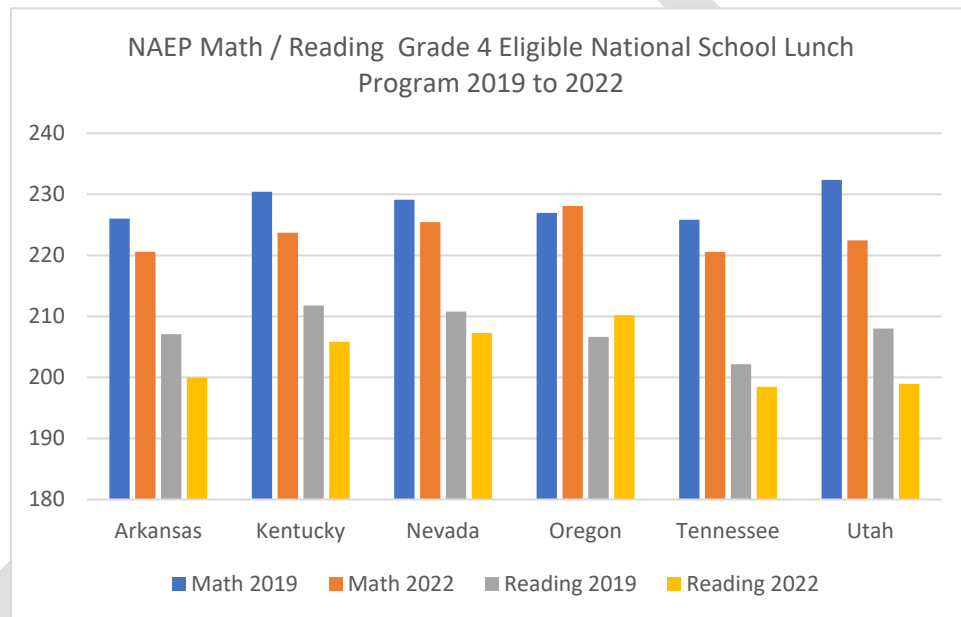
Nevada's performance, while showing declines, was relatively stable compared to the comparison states. The 4-point drop in Math and 3-point drop in Reading are less severe than the declines seen in Kentucky, Arkansas, and Utah. Oregon's improvement is an outlier, suggesting effective strategies to support lower-income students. Nevada's modest declines indicate that it was better able to maintain academic

performance for its lower-income students compared to most comparison states, but further efforts may be needed to recover from the learning loss experienced during this period.

NAEP MATH / READING GRADE 4 ELIGIBLE NATIONAL SCHOOL LUNCH PROGRAM, 2019 TO 2022

State	Math		Reading		Math Change	Reading Change
	2019	2022	2019	2022		
Arkansas	226	221	207	200	-5.4	-7.1
Kentucky	230	224	212	206	-6.7	-6.0
Nevada	229	225	211	207	-3.7	-3.5
Oregon	227	228	207	210	1.1	3.5
Tennessee	226	221	202	198	-5.3	-3.7
Utah	232	222	208	199	-9.9	-9.0

Source: NCES, 2024.



NAEP Math / Reading Grade 4 English Language Learners, 2019 to 2022

The table below compares the math and reading NAEP scale scores for the six comparison states for 2019 to 2022.

Between 2019 and 2022, Nevada experienced a decline in both math and reading scores for Grade 4 English Language Learners (ELLs) on the National Assessment of Educational Progress (NAEP). This trend is reflective of broader national challenges, but Nevada's decline is significant enough to merit comparison with other states.

In comparison, Nevada's 6-point drop in math is on par with Utah's, both being higher than Oregon's drop but still not as severe as Arkansas's steep decline. However, Tennessee stands out as the only state with a math score improvement, suggesting that Tennessee may have adopted successful strategies for supporting ELLs during this period.

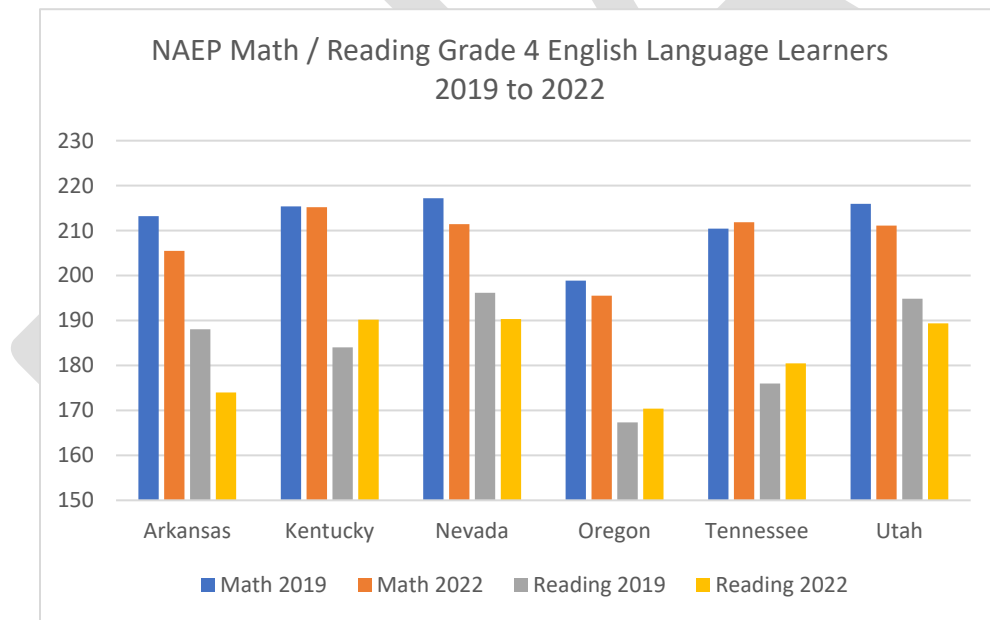
Nevada's ELL performance in both math and reading mirrored broader challenges faced by many states during the 2019 to 2022 period. The state's 6-point decline in both subjects, while concerning, was not as steep as Arkansas's significant drops in both areas. Kentucky and Tennessee, which saw reading or math improvements, stand out as exceptions to the trend, potentially indicating more effective ELL support systems.

Overall, while Nevada's performance was similar to Utah's and somewhat better than Arkansas's, it lagged behind Tennessee and Kentucky, which managed to either improve or maintain stability in their ELL scores.

NAEP MATH / READING GRADE 4 ENGLISH LANGUAGE LEARNERS, 2019 TO 2022

State	Math		Reading		Math Change	Reading Change
	2019	2022	2019	2022		
Arkansas	213	205	188	174	-7.7	-14.0
Kentucky	215	215	184	190	-0.2	6.1
Nevada	217	211	196	190	-5.8	-5.8
Oregon	199	196	167	170	-3.3	3.0
Tennessee	210	212	176	180	1.4	4.5
Utah	216	211	195	189	-4.9	-5.5

Source: NCES, 2024.



NAEP Math / Reading Grade 4: Students with Disabilities, 2019 to 2022

The data on Grade 4 Students with Disabilities from 2019 to 2022 for Math and Reading in the NAEP reveals varied trends across states, including Nevada.

- **Nevada's Stability in Math:** Nevada's 0-point change in math suggests resilience in this subject for students with disabilities, performing better in terms of score retention compared to

Arkansas, Utah, and Oregon, which experienced larger declines. Tennessee's slight dip in scores still left it with the highest math performance.

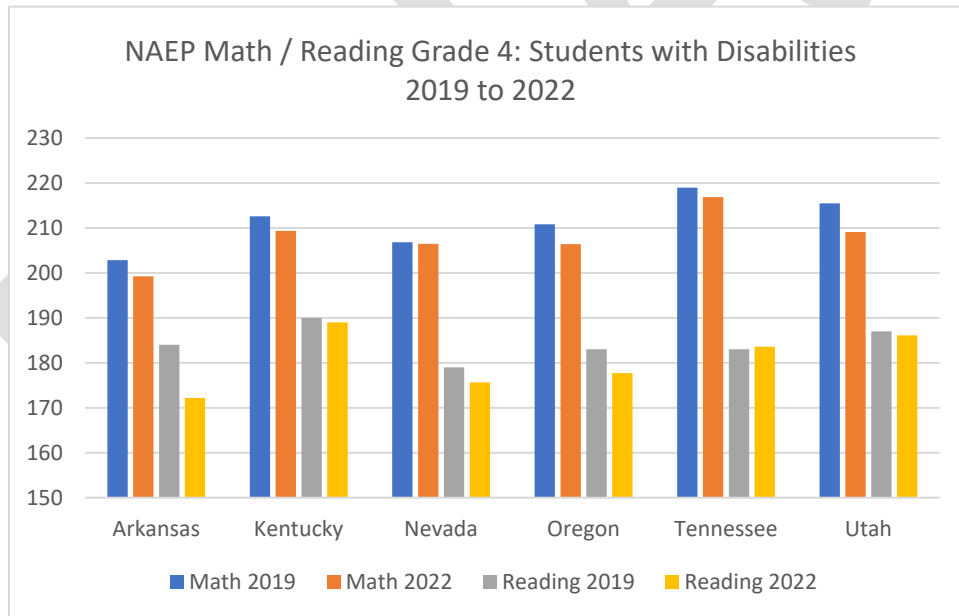
- **Moderate Decline in Reading:** Nevada's 3-point drop in reading was less drastic than Arkansas's sharp decline but was more pronounced than the minor changes seen in Kentucky and Utah. Tennessee again stands out for improving scores, while Nevada's reading performance in 2022 remained relatively low.

In conclusion, Nevada managed to hold its ground in math but experienced a moderate decline in reading. It performed better than Arkansas and Utah, but not as well as Kentucky or Tennessee, which managed to either mitigate declines or improve scores.

NAEP MATH / READING GRADE 4: STUDENTS WITH DISABILITIES, 2019 TO 2022

State	Math		Reading		Math Change	Reading Change
	2019	2022	2019	2022		
Arkansas	203	199	184	172	-3.6	-11.8
Kentucky	213	209	190	189	-3.2	-1.0
Nevada	207	206	179	176	-0.3	-3.4
Oregon	211	206	183	178	-4.4	-5.3
Tennessee	219	217	183	184	-2.1	0.6
Utah	215	209	187	186	-6.4	-0.9

Source: NCES, 2024.



NAEP Math / Reading Grade 8: All Students, 2019 to 2022

The table below shows the performance of Grade 8 students on the NAEP math and reading assessments for 2019 and 2022.

The data on Grade 8 Math and Reading for all students between 2019 and 2022 in the NAEP highlights both declines and improvements across states, including Nevada.

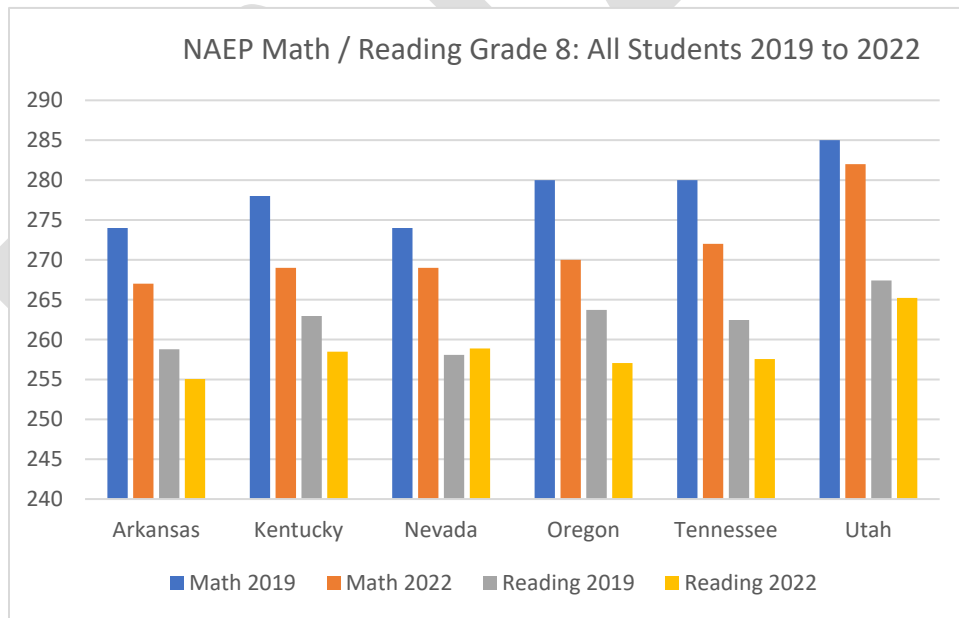
- Nevada's Math Decline: Nevada's 5-point decline in math is smaller than Oregon's, Kentucky's, and Tennessee's but larger than Utah's. In 2022, Nevada's math scores were on par with Kentucky's and Arkansas', all scoring 269, but behind Tennessee, Oregon, and Utah.
- Nevada's Reading Improvement: Nevada stands out for its 1-point improvement in reading, while all other comparison states saw declines. This improvement in reading is notable, particularly compared to the larger drops in Oregon and Tennessee.

In conclusion, Nevada's math performance followed a broader national decline, but the reading improvement distinguishes it from the comparison states, signaling some success in addressing literacy among Grade 8 students. Nevada's overall performance was mid-range in math but more positive in reading outcomes compared to Arkansas and Oregon.

NAEP MATH / READING GRADE 8: ALL STUDENTS, 2019 TO 2022

State	Math		Reading		Math Change	Reading Change
	2019	2022	2019	2022		
Arkansas	274	267	259	255	-7.0	-3.7
Kentucky	278	269	263	258	-9.0	-4.5
Nevada	274	269	258	259	-5.0	0.8
Oregon	280	270	264	257	-10.0	-6.7
Tennessee	280	272	262	258	-8.0	-4.9
Utah	285	282	267	265	-3.0	-2.2

Source: NCES, 2024.



NAEP Math / Reading Grade 8: Eligible National School Lunch Program, 2019 to 2022

The table below shows the comparison of students who are eligible for free / reduced lunches on the NAEP for Grade 8 in math and reading.

The data for Grade 8 students eligible for the National School Lunch Program (NSLP) in the NAEP for Math and Reading between 2019 and 2022 reveals different trends across the comparison states, especially Nevada.

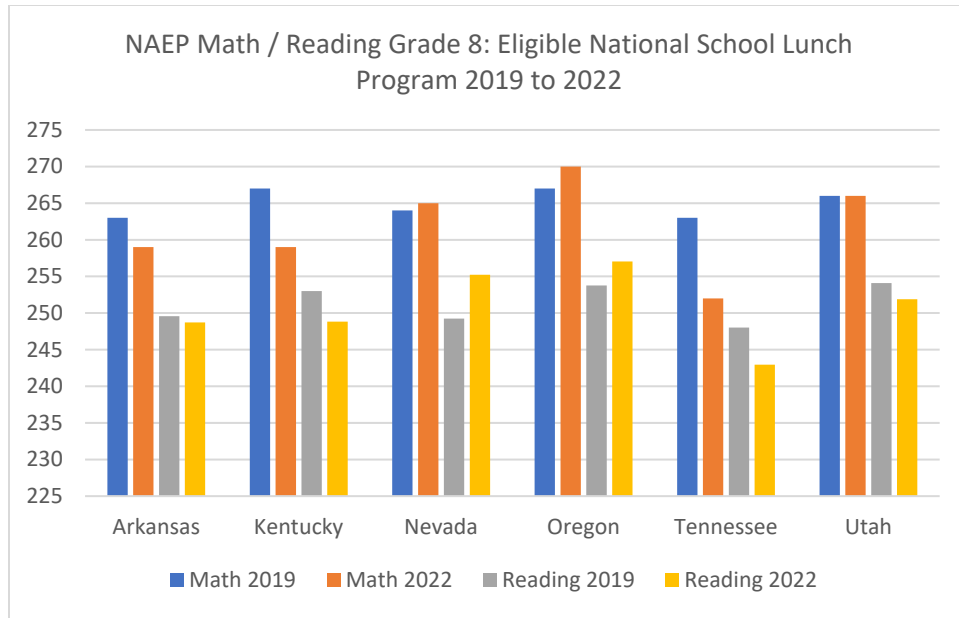
- **Nevada's Gains in Both Math and Reading:** Nevada's 1-point increase in math and 6-point improvement in reading are standout achievements compared to the other states. While most states saw declines, Nevada managed to make progress, particularly in reading, where its gain was the highest among the comparison states.
- **Oregon's Positive Performance:** Oregon also had positive outcomes, with a 3-point gain in math and a 3-point gain in reading, indicating improvements across both subjects, although not as strong as Nevada's.
- **Declines in Kentucky and Tennessee:** Kentucky and Tennessee saw significant declines, especially in math, with Kentucky's 8-point drop and Tennessee's 11-point drop highlighting major challenges in math education for NSLP students in those states. Tennessee's reading decline was also notable at 5 points.
- **Arkansas and Utah's Stability:** Arkansas had relatively stable performance with only a 4-point drop in math and 1-point drop in reading, while Utah saw no change in math and a minor 2-point decline in reading.

In conclusion, Nevada's performance was the strongest among these states, particularly in reading, where it saw a major improvement. Nevada's gains contrast sharply with the declines seen in Tennessee and Kentucky, and its resilience in math, coupled with Oregon's improvements, highlight that both states have been able to buck the national trend of declining performance among students eligible for the National School Lunch Program.

NAEP MATH / READING GRADE 8: ELIGIBLE NATIONAL SCHOOL LUNCH PROGRAM, 2019 TO 2022

State	Math		Reading		Math Change	Reading Change
	2019	2022	2019	2022		
Arkansas	263	259	250	249	-4.0	-0.9
Kentucky	267	259	253	249	-8.0	-4.2
Nevada	264	265	249	255	1.0	6.0
Oregon	267	270	254	257	3.0	3.3
Tennessee	263	252	248	243	-11.0	-5.1
Utah	266	266	254	252	0.0	-2.2

Source: NCES, 2024.



NAEP Math / Reading Grade 8: Students with Disabilities, 2019 to 2022

The table below shows the comparison of Grade 8 students with disabilities performance on the NAEP in both 2019 and 2022.

The data on Grade 8 students with disabilities from 2019 to 2022 for Math and Reading in the NAEP shows varying trends across Nevada and the comparison states.

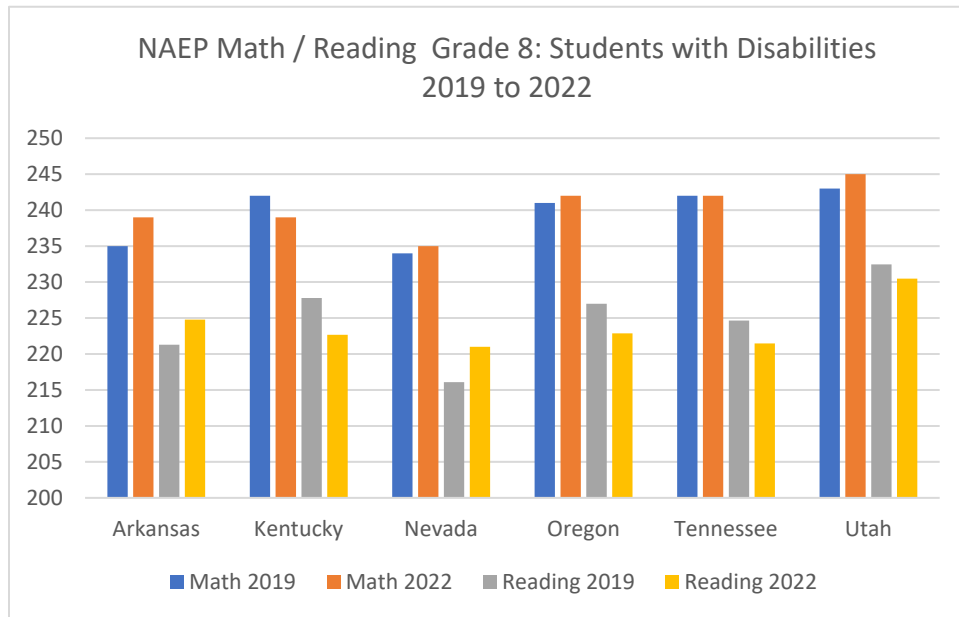
- **Nevada's Stability and Improvement:** Nevada's 1-point improvement in math and 5-point gain in reading make it a standout, especially in reading, where it had the largest improvement across all states. This suggests that Nevada's efforts to support students with disabilities in literacy were particularly successful between 2019 and 2022.
- **Arkansas's Significant Gains:** Arkansas also demonstrated positive results, with a 4-point gain in math and a 3-point gain in reading, showing consistent improvement in both subjects.
- **Declines in Kentucky, Tennessee, and Oregon:** Kentucky saw the most significant declines, particularly in reading, with a 5-point drop. Tennessee and Oregon also saw noticeable drops in reading performance, although Tennessee's math scores remained stable.
- **Utah's Balanced Performance:** Utah had the second-highest improvement in math with a 2-point increase, but saw a slight decline in reading, with a 2-point drop.

In conclusion, Nevada's improvement in reading was the most notable achievement, while Arkansas also made substantial gains in both math and reading. Kentucky, Tennessee, and Oregon experienced declines, particularly in reading, highlighting challenges in maintaining consistent performance for students with disabilities during this period.

NAEP MATH / READING GRADE 8: STUDENTS WITH DISABILITIES, 2019 TO 2022

State	Math		Reading		Math Change	Reading Change
	2019	2022	2019	2022		
Arkansas	235	239	221	225	4.0	3.5
Kentucky	242	239	228	223	-3.0	-5.1
Nevada	234	235	216	221	1.0	4.9
Oregon	241	242	227	223	1.0	-4.1
Tennessee	242	242	225	221	0.0	-3.2
Utah	243	245	232	230	2.0	-2.0

Source: NCES, 2024.

**NAEP Math / Reading Grade 8: English Language Learners, 2019 to 2022**

The table below compares the performance of Grade 8 English Language Learners on the NAEP for 2019 and 2022.

The data on Grade 8 English Language Learners (ELLs) from 2019 to 2022 for Math and Reading in the NAEP presents varied trends across Nevada and the comparison states.

- **Nevada's Performance:** Nevada's performance in both math and reading saw moderate declines, with a 3-point drop in math and a 3-point drop in reading. While these declines are concerning, Nevada did not experience the dramatic drop seen in Tennessee.
- **Oregon's Positive Gains:** Oregon showed the most consistent improvements, with a 5-point increase in math and a 1-point increase in reading. This suggests that Oregon may have implemented effective strategies to support ELL students during this period.
- **Tennessee's Significant Decline:** Tennessee's 15-point drop in math and 13-point drop in reading stand out as the most significant declines among the comparison states, indicating major challenges for ELL students in Tennessee.

- Utah's Strong Reading Improvement: Utah had a standout performance in reading, with a 12-point gain, while maintaining stability in math with no change. Utah's reading score of 231 in 2022 is the highest among the comparison states.
- Arkansas's Mixed Results: Arkansas saw a 5-point drop in math but a 2-point improvement in reading, resulting in a mixed performance for ELL students.

In conclusion, Nevada's decline in both math and reading places it in the middle of the group, performing better than Tennessee but not as well as Utah or Oregon. Oregon and Utah were the top performers, showing improvements in both subjects, while Tennessee's sharp declines reveal significant challenges for ELL education in the state.

NAEP Reading Grade 4: Race / Ethnicity, 2019 to 2022

The table below shows the NAEP Grade 4 Reading scale scores for 2019 and 2022 for the comparison states.

In comparing Nevada to the other states regarding NAEP Grade 4 Reading scores by race/ethnicity from 2019 to 2022, several observations emerge:

Asian/Pacific Islander:

- Nevada shows an improvement in scores for Asian/Pacific Islander students from 230 in 2019 to 235 in 2022, indicating progress in this demographic.
- In contrast, Kentucky experienced a decline from 235 to 208, while Utah also saw a decrease from 228 to 211. Oregon had a slight decline from 221 to 218.
- Arkansas and Tennessee did not meet the reporting standards for this demographic in 2022.

Black Students:

- Nevada's scores for Black students dropped from 200 in 2019 to 191 in 2022, indicating a decrease in performance.
- Arkansas also showed a decline from 197 to 188. Kentucky had a slight improvement from 199 to 200, and Tennessee showed a decrease from 204 to 193.
- Oregon and Utah did not meet reporting standards for this group in both years.

Hispanic Students:

- Nevada's Hispanic students' scores declined from 212 in 2019 to 205 in 2022, reflecting a reduction in performance.
- Arkansas and Oregon also saw declines in this category, with Arkansas going from 211 to 201 and Oregon from 199 to 191.
- Kentucky and Tennessee showed slight improvements in this demographic, with Kentucky increasing from 206 to 207 and Tennessee from 202 to 206.

Students of Two or More Races:

- Nevada saw a decline for students of two or more races, with scores dropping from 224 in 2019 to 210 in 2022.
- Kentucky also showed a decrease from 220 to 211, and Oregon went down from 228 to 213. Tennessee experienced a decline from 226 to 214.

- Utah did not meet the reporting standards in 2022, while Arkansas did not meet them in both years.

White Students:

- White students in Nevada showed a slight decrease in scores, from 229 in 2019 to 223 in 2022.
- This pattern of decline is consistent across the comparison states as well, with Arkansas dropping from 222 to 221, Kentucky from 225 to 220, Oregon from 224 to 217, Tennessee from 227 to 222, and Utah from 230 to 228.

Overall, Nevada, like many other states, experienced a general decline in NAEP Grade 4 Reading scores across most demographic groups from 2019 to 2022, with the exception of Asian/Pacific Islander students who showed improvement. This decline may point to broader trends in educational challenges during this period, potentially impacted by external factors such as the COVID-19 pandemic.

NAEP READING GRADE 4: RACE / ETHNICITY 2019 TO 2022

State	Asian / Pac Isl		Black		Hispanic		2 or More Races		White	
	2019	2022	2019	2022	2019	2022	2019	2022	2019	2022
Arkansas	219	*	197	188	211	201	*	*	222	221
Kentucky	235	208	199	200	206	207	220	211	225	220
Nevada	230	235	200	191	212	205	224	210	229	223
Oregon	221	218	*	*	199	191	228	213	224	217
Tennessee	*	*	204	193	202	206	226	214	227	222
Utah	228	211	*	*	207	200	226	*	230	228

Source: NCES, 2024.

* NCES Reporting Standards Not Met.

NAEP Math Grade 4: Race / Ethnicity, 2019 to 2022

The table below presents the data for NAEP Math Grade 4 scale scores for 2019 and 2022 for the comparison states.

In comparing Nevada to the other states regarding NAEP Grade 4 Math scores by race/ethnicity from 2019 to 2022, the following observations can be made:

Asian/Pacific Islander:

- Nevada's scores for Asian/Pacific Islander students show a slight decrease from 249 in 2019 to 245 in 2022.
- Kentucky and Oregon also experienced declines in this demographic, with Kentucky dropping from 260 to 255 and Oregon from 251 to 237.
- Utah showed a decrease from 245 to 236, while Arkansas and Tennessee did not meet the reporting standards for this demographic in both years.

Black Students:

- Nevada's scores for Black students decreased from 219 in 2019 to 211 in 2022.
- This trend of decline is also seen in Arkansas, which dropped from 215 to 207; Kentucky, which decreased significantly from 223 to 210; and Tennessee, which declined from 227 to 215.
- Oregon and Utah did not meet the reporting standards for this group in both years.

Hispanic Students:

- Nevada's Hispanic students' scores decreased from 230 in 2019 to 221 in 2022.
- Arkansas also saw a decline from 228 to 219, while Oregon's scores went down from 219 to 213.
- Kentucky maintained relatively stable performance with a slight decrease from 228 to 227, and Tennessee remained the same at 227. Utah experienced a decrease from 225 to 218.

Students of Two or More Races:

- Nevada saw a slight decrease for students of two or more races, with scores going from 241 in 2019 to 240 in 2022.
- Kentucky also showed a decrease from 239 to 235, and Oregon went down from 231 to 228. Tennessee experienced a slight decline from 244 to 243.
- Utah saw a marginal decrease from 245 to 244, while Arkansas did not meet the reporting standards in 2019 and showed a score of 222 in 2022.

White Students:

- White students in Nevada showed a slight decrease in scores, from 247 in 2019 to 242 in 2022.
- This pattern of decline is consistent across most comparison states, with Arkansas dropping from 240 to 236, Kentucky from 242 to 237, and Oregon from 243 to 233.
- Tennessee's scores declined slightly from 247 to 245, and Utah saw a marginal decrease from 249 to 247.

Overall, Nevada, similar to comparison states, experienced a general decline in NAEP Grade 4 Math scores across most demographic groups from 2019 to 2022. The declines suggest potential impacts from broader educational challenges during this period.

NAEP MATH GRADE 4: RACE / ETHNICITY, 2019 TO 2022

State	Asian / Pac Isl		Black		Hispanic		2 or More Races		White	
	2019	2022	2019	2022	2019	2022	2019	2022	2019	2022
Arkansas	*	*	215	207	228	219	*	222	240	236
Kentucky	260	255	223	210	228	227	239	235	242	237
Nevada	249	245	219	211	230	221	241	240	247	242
Oregon	251	237	*	*	219	213	231	228	243	233
Tennessee	*	*	227	215	224	227	244	243	247	245
Utah	245	236	*	*	225	218	245	244	249	247

Source: NCES, 2024.

* NCES Reporting Standards Not Met

NAEP Reading Grade 8: Race / Ethnicity, 2019 to 2022

The table below presents the data for NAEP Grade 8 Reading scale scores for 2019 and 2022 for the comparison states.

In analyzing NAEP Reading Grade 8 scores by race/ethnicity from 2019 to 2022 for Nevada compared to other states, the following observations can be made:

Asian/Pacific Islander:

- Nevada saw a slight decrease in scores for Asian/Pacific Islander students from 296 in 2019 to 292 in 2022.

- Kentucky and Tennessee reported the highest scores in 2019 (298 and 317, respectively) but did not meet reporting standards for 2022.
- Oregon displayed a notable increase, moving from 196 in 2019 to 293 in 2022.
- Arkansas and Utah did not meet reporting standards in 2022 for this demographic.

Black Students:

- Nevada's scores for Black students declined from 254 in 2019 to 247 in 2022, indicating a decrease in performance.
- Similar trends were observed in other states, with Arkansas dropping slightly from 249 to 248, and Kentucky showing a more significant decline from 256 to 248.
- Tennessee's scores also fell from 260 to 250.
- Oregon and Utah did not meet the reporting standards for this group in both years.

Hispanic Students:

- Hispanic students in Nevada experienced a decrease in scores from 266 in 2019 to 261 in 2022.
- This decline is consistent with trends in other states such as Arkansas, which saw a drop from 269 to 260, and Kentucky, which decreased from 270 to 259.
- Oregon also showed a decline from 258 to 256, while Tennessee fell from 267 to 259.
- Utah's scores remained stable at 263 in 2019 and 261 in 2022.

Students of Two or More Races:

- Nevada saw a decline in scores for students of two or more races from 279 in 2019 to 272 in 2022.
- Kentucky had a slight decrease from 267 to 265, and Oregon went down from 289 to 279.
- Tennessee's scores showed a marginal decrease from 279 to 276, while Utah had a more noticeable drop from 294 to 281.
- Arkansas did not meet the reporting standards in both years for this group.

White Students:

- White students in Nevada had a small decline in scores from 286 in 2019 to 284 in 2022.
- This trend is similar in other states, with Arkansas decreasing from 284 to 274, and Kentucky from 282 to 274.
- Oregon saw a drop from 287 to 275, and Tennessee from 287 to 281.
- Utah's scores showed a minimal decrease, from 291 to 290.

Overall, Nevada, like other comparison states, generally experienced declines in NAEP Reading Grade 8 scores across most demographic groups from 2019 to 2022. These patterns may indicate broader educational challenges during this time frame. However, the increase in Oregon's scores for Asian/Pacific Islander students is a notable exception.

NAEP READING GRADE 8: RACE / ETHNICITY, 2019 TO 2022

State	Asian / Pac Isl		Black		Hispanic		2 or More Races		White	
	2019	2022	2019	2022	2019	2022	2019	2022	2019	2022
Arkansas	276	*	249	248	269	260	*	*	284	274
Kentucky	298	*	256	248	270	259	267	265	282	274
Nevada	296	292	254	247	266	261	279	272	286	284
Oregon	196	293	*	*	258	256	289	279	287	275
Tennessee	317	*	260	250	267	259	279	276	287	281
Utah	282	*	*	*	263	261	294	281	291	290

Source: NCES, 2024.

* NCES Reporting Standards Not Met

NAEP Math Grade 8: Race / Ethnicity, 2019 to 2022

The table below presents the data for NAEP Grade 8 Math scale scores for 2019 and 2022 for the comparison states.

In analyzing NAEP Math Grade 8 scores by race/ethnicity from 2019 to 2022 for Nevada compared to other states, the following observations are noted:

Asian/Pacific Islander:

- Nevada experienced a slight decline in scores for Asian/Pacific Islander students, from 296 in 2019 to 292 in 2022.
- Oregon showed a marginal increase in this demographic, going from 296 to 293.
- Tennessee had the highest score in 2019 (317), but did not meet reporting standards for 2022.
- Arkansas, Kentucky, and Utah also did not meet reporting standards for this demographic in 2022.

Black Students:

- Nevada saw a decrease in scores for Black students, from 254 in 2019 to 247 in 2022.
- Arkansas showed a slight improvement, increasing from 249 to 253.
- Kentucky experienced a notable decline from 256 to 248, while Tennessee's scores dropped from 260 to 250.
- Oregon and Utah did not meet the reporting standards for this group in both years.

Hispanic Students:

- Nevada's scores for Hispanic students slightly decreased from 266 in 2019 to 261 in 2022.
- Arkansas showed a decrease from 269 to 261, while Kentucky's scores declined from 270 to 259.
- Oregon's scores also dropped from 258 to 256, and Tennessee saw a decrease from 267 to 259.
- Utah's scores remained relatively stable with a small decrease from 263 to 261.

Students of Two or More Races:

- Nevada experienced a significant drop in scores for students of two or more races, from 279 in 2019 to 172 in 2022.

- Other states generally showed more stability, with Kentucky seeing a slight decrease from 267 to 265 and Tennessee dropping from 279 to 276.
- Oregon displayed a decrease from 289 to 279.
- Arkansas did not meet the reporting standards in both years for this demographic.

White Students:

- Nevada's scores for White students remained relatively stable, with a slight decrease from 286 in 2019 to 284 in 2022.
- This stability is similar to the trend in Oregon, which saw a slight increase from 287 to 285.
- Arkansas and Kentucky both showed a decrease, with Arkansas going from 284 to 274 and Kentucky from 282 to 274.
- Tennessee's scores dropped slightly from 287 to 281, while Utah's scores were relatively stable, showing a minor increase from 291 to 290.

Overall, Nevada, like many comparison states, experienced a general decline or stabilization in NAEP Math Grade 8 scores across most demographic groups from 2019 to 2022, with a notable significant drop for students of two or more races. This trend may reflect broader challenges in maintaining educational performance during this period.

NAEP MATH GRADE 8: RACE / ETHNICITY, 2019 TO 2022

State	Asian / Pac Isl		Black		Hispanic		2 or More Races		White	
	2019	2022	2019	2022	2019	2022	2019	2022	2019	2022
Arkansas	276	*	249	253	269	261	*	254	284	274
Kentucky	298	*	256	248	270	259	267	265	282	274
Nevada	296	292	254	247	266	261	279	172	286	284
Oregon	296	293	*	*	258	256	289	279	287	285
Tennessee	317	*	260	250	267	259	279	276	287	281
Utah	282	*	*	*	263	261	294	281	291	290

Source: NCES, 2024.

* NCES Reporting Standards Not Met

Finance

Per Pupil Total Revenues 2018-19 to 2022-23

The table below provides the comparison for per pupil total revenues for 2018-19 and 2022-23 for the six states in the study.

Nevada's per pupil total revenue growth from the 2018-19 to the 2022-23 school year is relatively modest compared to the comparison states. With a 7 percent increase, Nevada experienced the smallest percentage growth in per pupil funding among the six states. Its revenue rose from \$11,194 in 2018-19 to \$12,024 in 2022-23.

When comparing Nevada to the other states:

- Arkansas, Kentucky, and Tennessee each saw increases of 9-10 percent, with Arkansas and Tennessee starting with lower initial per pupil revenues than Nevada but surpassing or matching Nevada's growth rate.

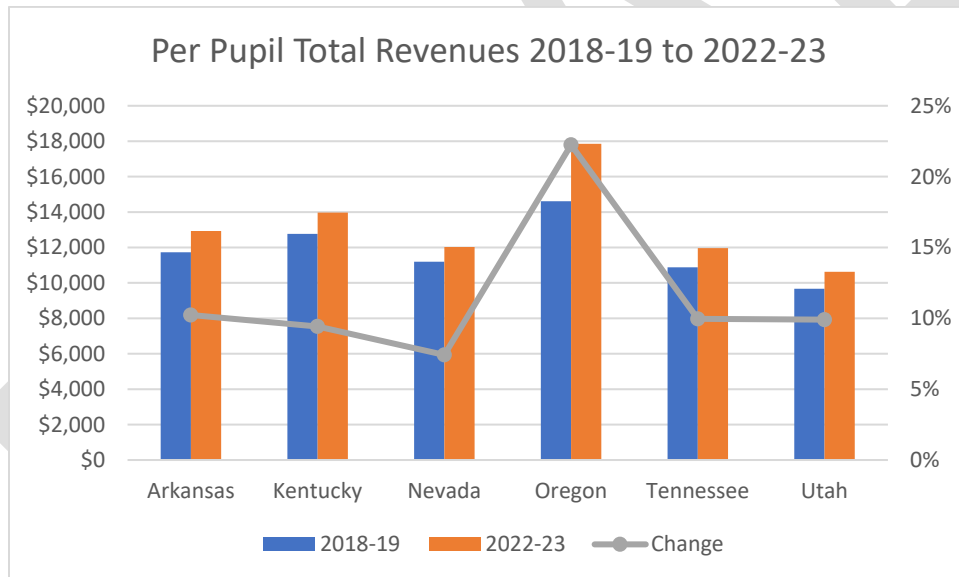
- Utah also had a 10 percent growth rate, though its overall per pupil revenue remains the lowest among the states listed, moving from \$9,672 to \$10,630.
- Oregon stands out with the highest growth rate at 22 percent, significantly outpacing all the other states. Oregon's per pupil revenue increased from \$14,608 to \$17,857, indicating a strong investment in education over this period.

Nevada's growth in per pupil total revenues is on the lower end compared to these other states, particularly when considering Oregon's significant 22 percent increase. This suggests that Nevada may be investing less aggressively in education funding relative to some of its peers.

PER PUPIL TOTAL REVENUES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$11,733	\$12,934	10%
Kentucky	\$12,764	\$13,967	9%
Nevada	\$11,194	\$12,024	7%
Oregon	\$14,608	\$17,857	22%
Tennessee	\$10,881	\$11,965	10%
Utah	\$9,672	\$10,630	10%

Source: NCES, 2024.



Per Pupil Local Revenues, 2018-19 to 2022-23

The table below shows the per pupil local revenues for the six states for both 2018-19 and 2022-23.

Nevada's per pupil local revenue increase from 2018-19 to 2022-23 was relatively modest, showing a 3 percent growth from \$6,429 to \$6,651. This increase is the lowest among the states compared, tied with Utah, which also experienced a 3 percent increase from \$3,654 to \$3,758. Despite the small growth rate, Nevada's local revenue per pupil in both years remains one of the highest, second only to Oregon in 2022-23.

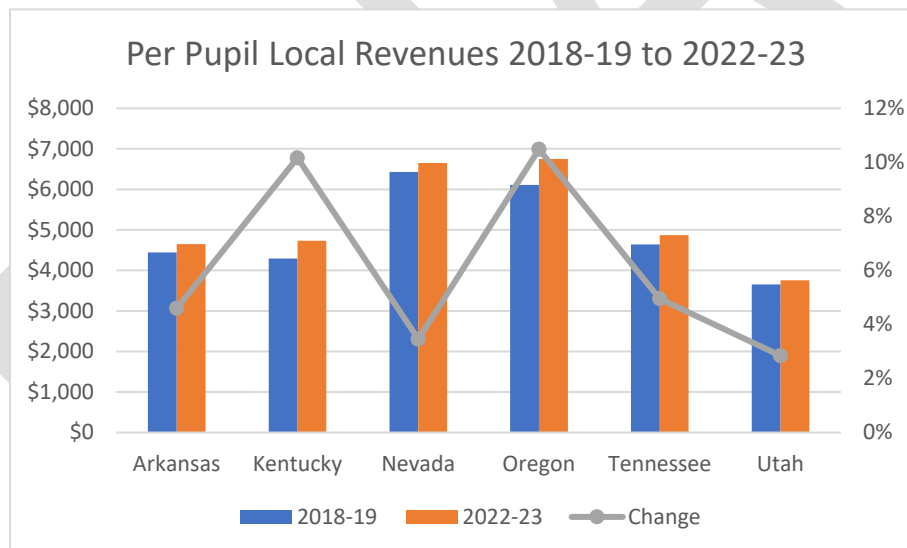
- Oregon saw a significant 10 percent increase in local revenue, rising from \$6,109 to \$6,749, the highest percentage increase along with Kentucky.
- Kentucky also achieved a 10 percent increase, with per pupil local revenues increasing from \$4,294 to \$4,730.
- Arkansas and Tennessee had moderate increases of 5 percent, with Arkansas moving from \$4,444 to \$4,649 and Tennessee from \$4,642 to \$4,871.

While Nevada's percentage growth is lower, it still maintains a high level of local revenue per pupil, indicating that while growth has slowed, the state relies substantially on local funding for education. This reliance on local revenue might reflect Nevada's tax structure and funding policies in comparison to other states.

PER PUPIL LOCAL REVENUES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$4,444	\$4,649	5%
Kentucky	\$4,294	\$4,730	10%
Nevada	\$6,429	\$6,651	3%
Oregon	\$6,109	\$6,749	10%
Tennessee	\$4,642	\$4,871	5%
Utah	\$3,654	\$3,758	3%

Source: NCES, 2024.



Per Pupil State Revenues, 2018-19 to 2022-23

The table below provides the state level per pupil revenues for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil state revenue increased by 5 percent from 2018-19 to 2022-23, rising from \$3,778 to \$3,969. Despite this growth, Nevada's per pupil state revenue remains significantly lower than the comparison states. This modest increase places Nevada in the middle range in terms of percentage change but still at the bottom in terms of actual funding levels.

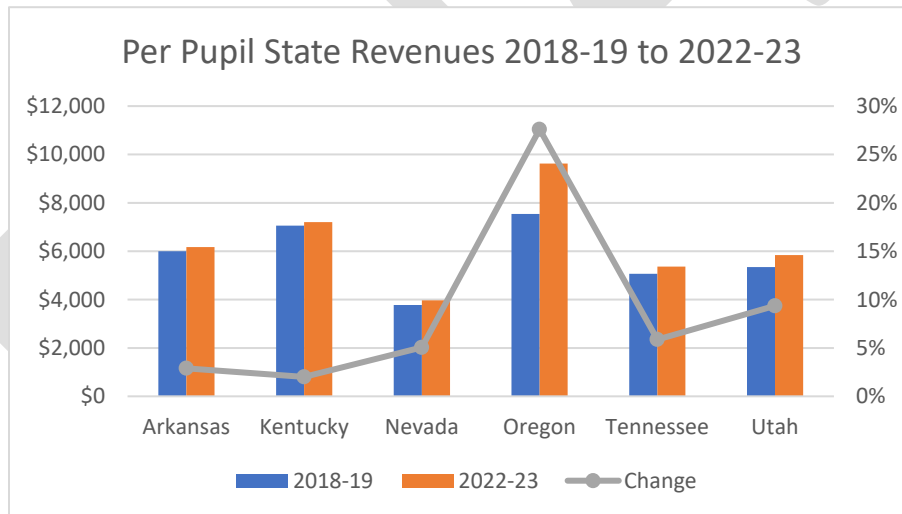
- Oregon experienced the highest increase in state revenue at 28 percent, growing from \$7,543 to \$9,624. This substantial investment reflects a strong state-level commitment to funding education.
- Utah saw a 9 percent increase, which is quite significant given its starting point, moving from \$5,343 to \$5,843.
- Tennessee had a 6 percent increase, going from \$5,067 to \$5,365, while Arkansas and Kentucky experienced much smaller increases of 3 percent and 2 percent, respectively.

Nevada's lower state revenue per pupil suggests a greater reliance on local revenue sources, as evidenced by its relatively high per pupil local revenues. However, the overall smaller growth in state funding might indicate limitations in state-level educational investment or different funding strategies compared to Oregon and Utah, which have shown more robust increases in state funding.

PER PUPIL STATE REVENUES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$6,000	\$6,174	3%
Kentucky	\$7,060	\$7,202	2%
Nevada	\$3,778	\$3,969	5%
Oregon	\$7,543	\$9,624	28%
Tennessee	\$5,067	\$5,365	6%
Utah	\$5,343	\$5,843	9%

Source: NCES, 2024.



Per Pupil Federal Revenues, 2018-19 to 2022-23

The table below provides the federal level per pupil revenues for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil federal revenue increased by 42 percent from 2018-19 to 2022-23, rising from \$987 to \$1,404. While this is a significant increase, it is still lower in percentage growth compared to most of the comparison states, except for Kentucky which had a 44 percent increase.

- Arkansas had the highest increase in federal revenue per pupil at 64 percent, with figures rising from \$1,289 to \$2,111. This substantial growth indicates a significant boost in federal funding.

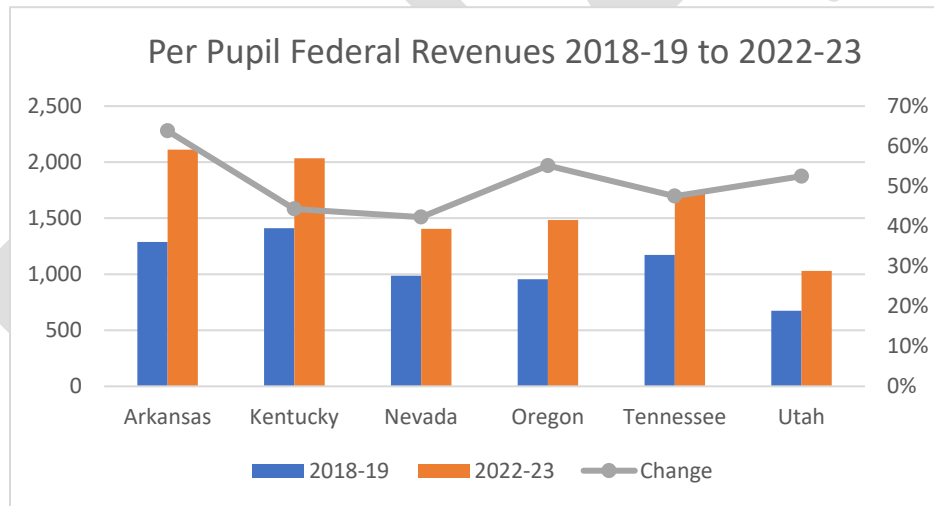
- Oregon saw a 55 percent increase, from \$956 to \$1,483, which is a higher growth rate than Nevada but started from a lower base amount.
- Utah experienced a 52 percent increase, which is notable given its initial lower federal revenue, going from \$675 to \$1,029.
- Tennessee received a 48 percent increase, from \$1,172 to \$1,729, marking a substantial rise in federal support.

Despite the substantial percentage increase in Nevada, the state's overall federal revenue per pupil remains moderate in comparison to others, suggesting that while there has been growth, the federal funding level is relatively balanced rather than being a primary source of education funding. This reflects a diverse funding strategy where Nevada doesn't heavily rely on federal funds alone for educational revenues.

PER PUPIL FEDERAL REVENUES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	1,289	2,111	64%
Kentucky	1,410	2,035	44%
Nevada	987	1,404	42%
Oregon	956	1,483	55%
Tennessee	1,172	1,729	48%
Utah	675	1,029	52%

Source: NCES, 2024.



Per Pupil Total Expenditures, 2018-19 to 2022-23

The table below compares the total per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil total expenditures increased by 8 percent from 2018-19 to 2022-23, rising from \$9,280 to \$10,034. This growth rate is moderate compared to the other states listed. Although it surpasses the increase seen in Arkansas and Kentucky (both at 6%) and Tennessee (at 4%), it falls behind Oregon's significant 18 percent growth and Utah's 12 percent.

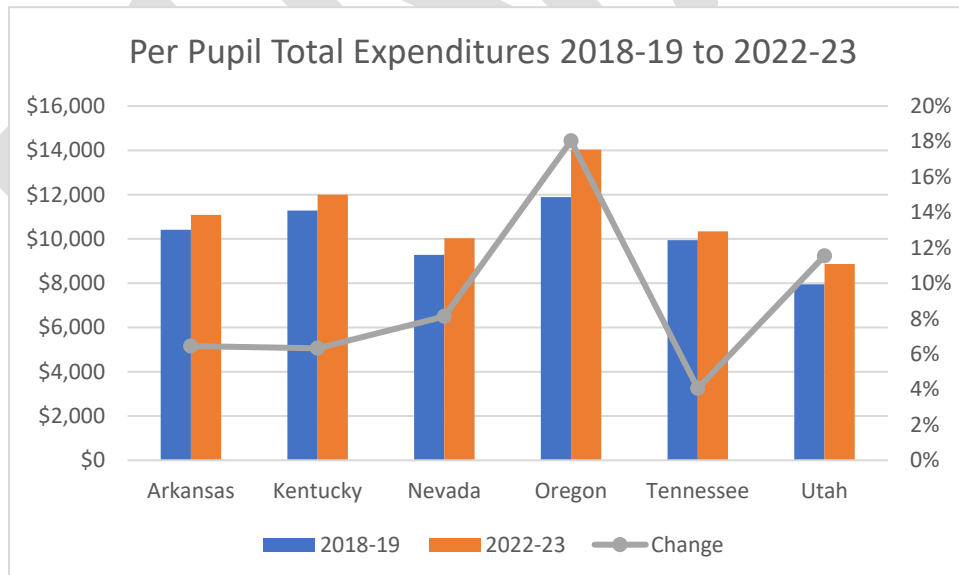
- Oregon experienced the highest increase in total expenditures per pupil, rising by 18 percent from \$11,889 to \$14,034. This indicates a substantial investment in education, which is also reflected in Oregon's higher revenue increases.
- Utah saw a 12 percent increase in total expenditures, from \$7,950 to \$8,868. Although Utah has the lowest overall expenditure per pupil, the growth rate suggests a growing investment in education.
- Arkansas and Kentucky each had a 6percent increase, moving from \$10,412 to \$11,083 and \$11,280 to \$11,994, respectively.
- Tennessee had the smallest increase in expenditures at 4percent, from \$9,941 to \$10,345.

Nevada's expenditure per pupil is increasing at a steady rate, reflecting a moderate but growing investment in education. However, it remains lower than Oregon and Kentucky, indicating that while Nevada is enhancing its educational funding, it still trails behind states with higher overall expenditures. This may impact the resources available for students and schools in Nevada compared to those in states with higher or more rapidly increasing per pupil spending.

PER PUPIL TOTAL EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$10,412	\$11,083	6%
Kentucky	\$11,280	\$11,994	6%
Nevada	\$9,280	\$10,034	8%
Oregon	\$11,889	\$14,034	18%
Tennessee	\$9,941	\$10,345	4%
Utah	\$7,950	\$8,868	12%

Source: NCES, 2024.



Per Pupil Instructional Expenditures, 2018-19 to 2022-23

The table below compares the instructional per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil instructional expenditures grew by 14 percent from 2018-19 to 2022-23, increasing from \$5,331 to \$6,054. This rate of growth is relatively high compared to other states in the list, indicating a significant increase in investment toward direct instructional costs such as teacher salaries and classroom resources.

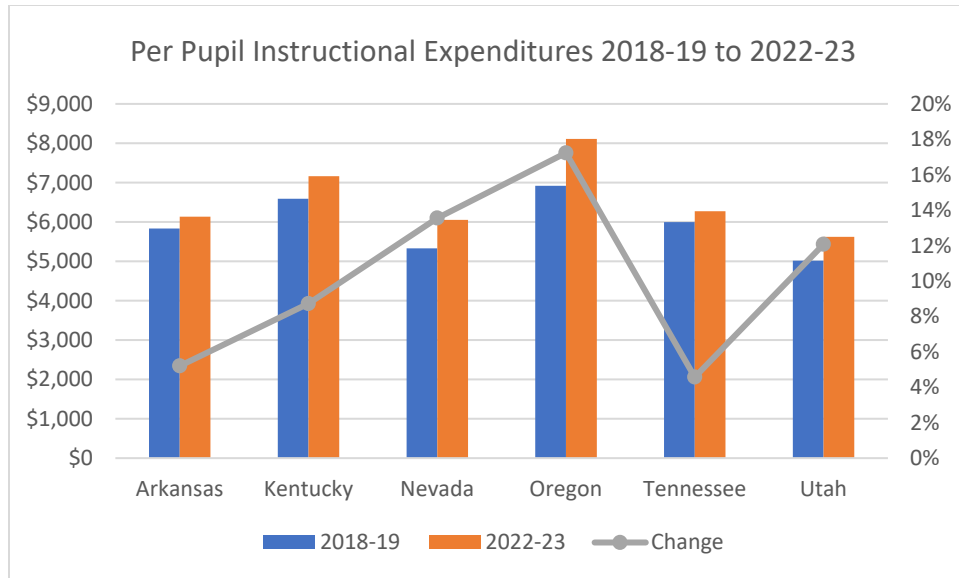
- Oregon had the highest increase in instructional expenditures at 17 percent, growing from \$6,919 to \$8,112. This substantial increase indicates a strong focus on improving the quality of instruction and educational outcomes in the state.
- Kentucky saw a 9 percent increase, with expenditures rising from \$6,589 to \$7,164. This steady growth reflects a continued investment in classroom and teacher-related expenses.
- Utah also showed a notable 12 percent increase in instructional spending, going from \$5,017 to \$5,623, which, despite being lower than Nevada's starting and ending points, suggests a commitment to enhancing instructional quality.
- Arkansas and Tennessee experienced smaller increases of 5 percent, with Arkansas increasing from \$5,832 to \$6,136 and Tennessee from \$5,998 to \$6,273.

Nevada's significant increase in per pupil instructional expenditures indicates a focused effort to enhance the quality of education directly affecting student learning experiences. Although starting from a lower base compared to Oregon and Kentucky, Nevada's relatively higher percentage growth signifies a prioritization of instructional investment, aiming to improve the educational outcomes and quality of instruction for students in the state.

PER PUPIL INSTRUCTIONAL EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$5,832	\$6,136	5%
Kentucky	\$6,589	\$7,164	9%
Nevada	\$5,331	\$6,054	14%
Oregon	\$6,919	\$8,112	17%
Tennessee	\$5,998	\$6,273	5%
Utah	\$5,017	\$5,623	12%

Source: NCES, 2024.



Per Pupil Support Services Expenditures, 2018-19 to 2022-23

The table below compares the support services per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil support services expenditures increased by a modest 3 percent from 2018-19 to 2022-23, rising from \$3,586 to \$3,694. This represents the smallest percentage increase among the states listed, indicating that Nevada's investment in support services, such as counseling, health services, and student transportation, has grown at a slower rate compared to others.

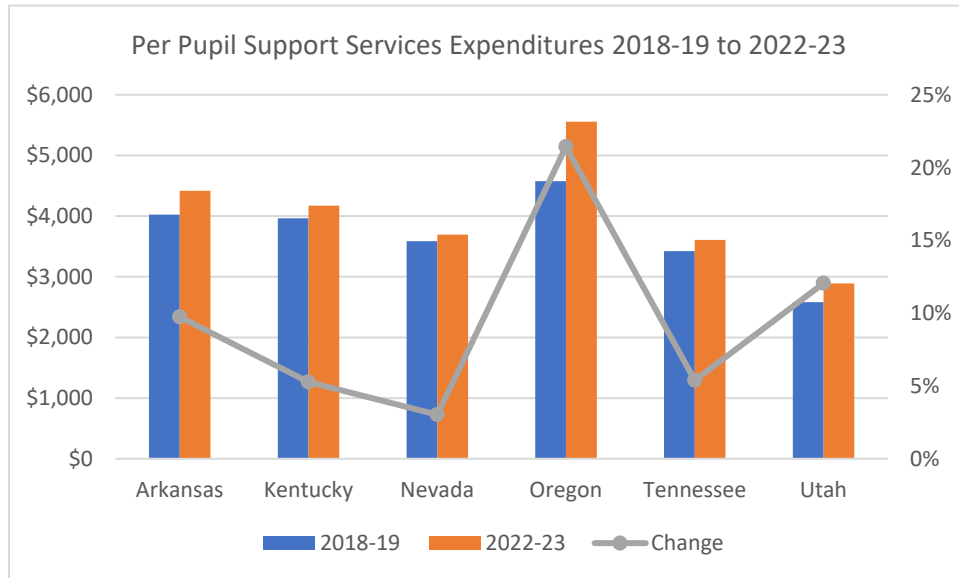
- Oregon had the highest increase in support services expenditures at 21 percent, with an increase from \$4,577 to \$5,558. This suggests a strong emphasis on enhancing student support services to contribute to overall student well-being and educational outcomes.
- Utah saw a 12 percent increase in these expenditures, from \$2,580 to \$2,891, which, despite being the lowest in terms of total expenditure, indicates a notable commitment to improving support services.
- Arkansas experienced a 10 percent increase, from \$4,025 to \$4,417, reflecting a moderate but steady growth in funding for support services.
- Kentucky and Tennessee both saw increases of 5 percent, with Kentucky rising from \$3,963 to \$4,172 and Tennessee from \$3,423 to \$3,607.

Nevada's relatively small increase in per pupil support services expenditures indicates a more conservative approach to growing these services. While Oregon and Utah have prioritized increasing their investment in student support, Nevada's growth in this area has been slower, which may impact the overall range and quality of services provided to students. This slower growth could reflect different funding priorities or resource limitations within the state's education budget.

PER PUPIL SUPPORT SERVICES EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$4,025	\$4,417	10%
Kentucky	\$3,963	\$4,172	5%
Nevada	\$3,586	\$3,694	3%
Oregon	\$4,577	\$5,558	21%
Tennessee	\$3,423	\$3,607	5%
Utah	\$2,580	\$2,891	12%

Source: NCES, 2024.

**Per Pupil Non-Instructional Expenditures, 2018-19 to 2022-23**

The table below compares the non-instructional per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada experienced a significant decrease in per pupil non-instructional expenditures from 2018-19 to 2022-23, with a reduction of 21 percent from \$364 to \$286. This decline is the largest among the states listed, indicating a substantial cutback in areas categorized as non-instructional, which could include administrative costs, facilities maintenance, and other operational expenses not directly related to classroom instruction.

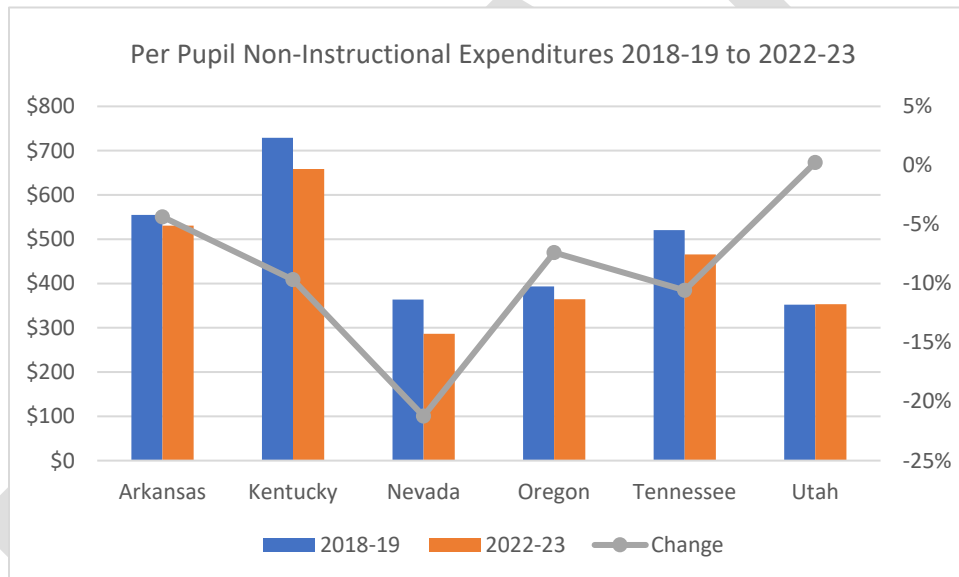
- Utah was the only state with virtually no change in non-instructional expenditures, remaining almost flat with a negligible increase from \$352 to \$353, indicating a consistent approach to non-instructional spending.
- Arkansas saw a 4 percent decrease, reducing from \$555 to \$531, and Oregon had a 7 percent decrease, from \$393 to \$364. Both states had relatively modest reductions compared to Nevada.
- Kentucky and Tennessee experienced larger reductions than Arkansas and Oregon, with Kentucky decreasing by 10 percent from \$729 to \$659, and Tennessee by 11 percent from \$521 to \$466.

Nevada's sharp reduction in non-instructional expenditures suggests a strategic reallocation of resources or budget constraints leading to reduced spending in areas outside direct instruction. This cutback could have been a result of efforts to prioritize direct educational services or respond to financial pressures, potentially affecting the operational aspects of schools, such as administrative support and facility management. The impact of this reduction on the overall quality of education would depend on how well schools can maintain necessary services with reduced funding in these areas.

PER PUPIL NON-INSTRUCTIONAL EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$555	\$531	-4%
Kentucky	\$729	\$659	-10%
Nevada	\$364	\$286	-21%
Oregon	\$393	\$364	-7%
Tennessee	\$521	\$466	-11%
Utah	\$352	\$353	0%

Source: NCES, 2024.



Per Pupil Total Salary Expenditures, 2018-19 to 2022-23

The table below compares the salary per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil total salary expenditures increased by 9 percent from 2018-19 to 2022-23, rising from \$5,326 to \$5,789. This growth rate is higher than several other states in the comparison but lower than Oregon and Utah, indicating a moderate increase in investment towards salaries, which include teachers, administrative staff, and other educational personnel.

- Oregon saw the highest increase in salary expenditures per pupil, with a 17 percent increase from \$6,098 to \$7,165. This substantial growth indicates a significant emphasis on increasing salaries, which may reflect efforts to retain and attract quality staff or adjust for cost-of-living increases.

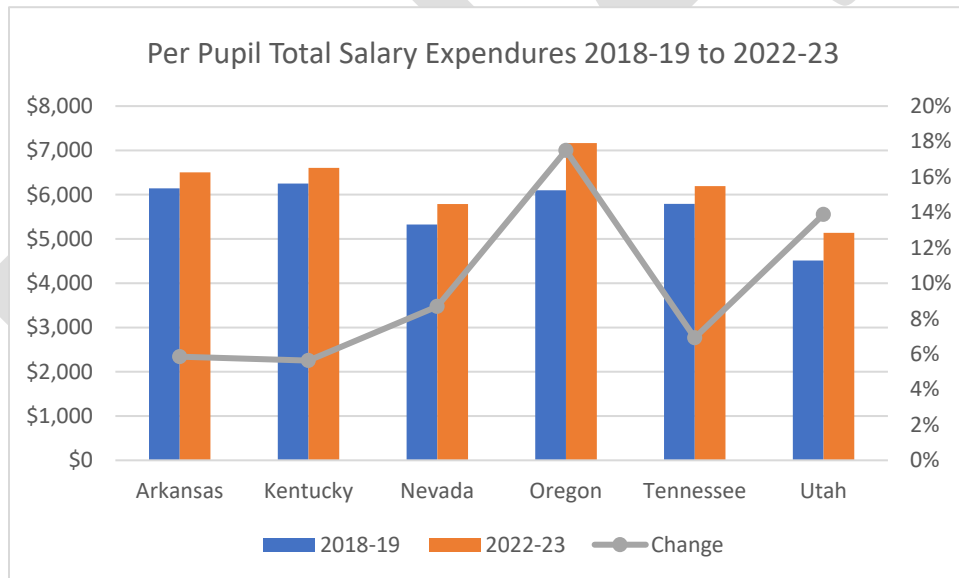
- Utah also experienced a notable increase of 14 percent, from \$4,513 to \$5,139. Despite starting from a lower base, Utah's significant percentage increase suggests a focus on enhancing compensation to improve educational quality.
- Tennessee had a 7 percent increase, with per pupil salary expenditures rising from \$5,793 to \$6,194. This steady increase indicates a balanced approach to salary adjustments.
- Arkansas and Kentucky both experienced similar growth rates of 6 percent, with Arkansas increasing from \$6,143 to \$6,503 and Kentucky from \$6,251 to \$6,603.

In summary, Nevada's 9 percent increase in per pupil salary expenditures shows a commitment to investing in staff and educational quality, but the total amount spent per pupil on salaries remains lower than Oregon and Kentucky. This indicates that while Nevada is improving its salary expenditures, it still has room for growth in terms of overall investment in personnel compared to some other states.

PER PUPIL TOTAL SALARY EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$6,143	\$6,503	6%
Kentucky	\$6,251	\$6,603	6%
Nevada	\$5,326	\$5,789	9%
Oregon	\$6,098	\$7,165	17%
Tennessee	\$5,793	\$6,194	7%
Utah	\$4,513	\$5,139	14%

Source: NCES, 2024.



Per Pupil Employee Benefits Expenditures, 2018-19 to 2022-23

The table below compares the employee benefits per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil employee benefits expenditures increased by 12 percent from 2018-19 to 2022-23, rising from \$2,200 to \$2,463. This increase is relatively moderate compared to the other states listed,

showing a commitment to enhancing employee benefits for educational staff but not as significantly as in some other states.

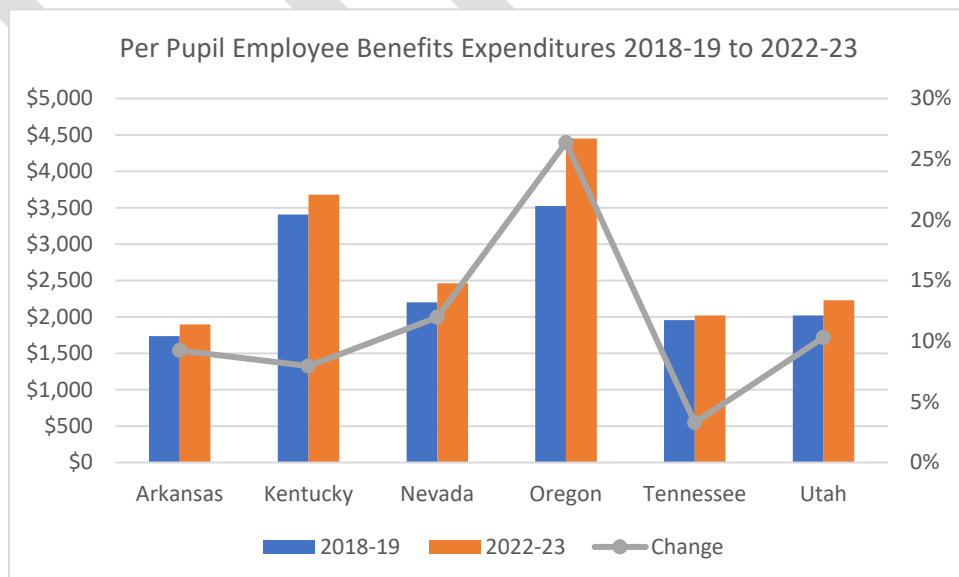
- Oregon had the highest increase in employee benefits expenditures per pupil, with a significant 26 percent increase from \$3,523 to \$4,452. This suggests a strong emphasis on improving benefits for educators and other school employees, possibly reflecting efforts to improve recruitment and retention.
- Utah experienced a 10 percent increase, rising from \$2,020 to \$2,228. Although starting from a lower base, Utah's growth indicates a meaningful improvement in employee benefits.
- Arkansas saw a 9 percent increase in expenditures, from \$1,736 to \$1,897, and Kentucky experienced an 8 percent increase from \$3,408 to \$3,679, showing steady but moderate enhancements in benefits.
- Tennessee had the smallest increase at just 3 percent, from \$1,955 to \$2,020, indicating a more conservative approach to changing employee benefits.

In summary, while Nevada's increase in per pupil employee benefits expenditures is significant, it is still lower than Oregon's robust increase. This suggests that while Nevada is making strides in improving benefits for its educational staff, the level of increase and overall expenditure remains more moderate, indicating different priorities or budgetary constraints in comparison to states with larger increases like Oregon.

PER PUPIL EMPLOYEE BENEFITS EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$1,736	\$1,897	9%
Kentucky	\$3,408	\$3,679	8%
Nevada	\$2,200	\$2,463	12%
Oregon	\$3,523	\$4,452	26%
Tennessee	\$1,955	\$2,020	3%
Utah	\$2,020	\$2,228	10%

Source: NCES, 2024.



Per Pupil Purchased Services Expenditures, 2018-19 to 22-23

The table below compares the purchase services per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada experienced a 4 percent decrease in per pupil purchased services expenditures from 2018-19 to 2022-23, dropping from \$742 to \$710. This reduction is the largest percentage decrease among the states listed, suggesting a move toward reducing spending on services that are typically contracted out, such as transportation, maintenance, or professional services.

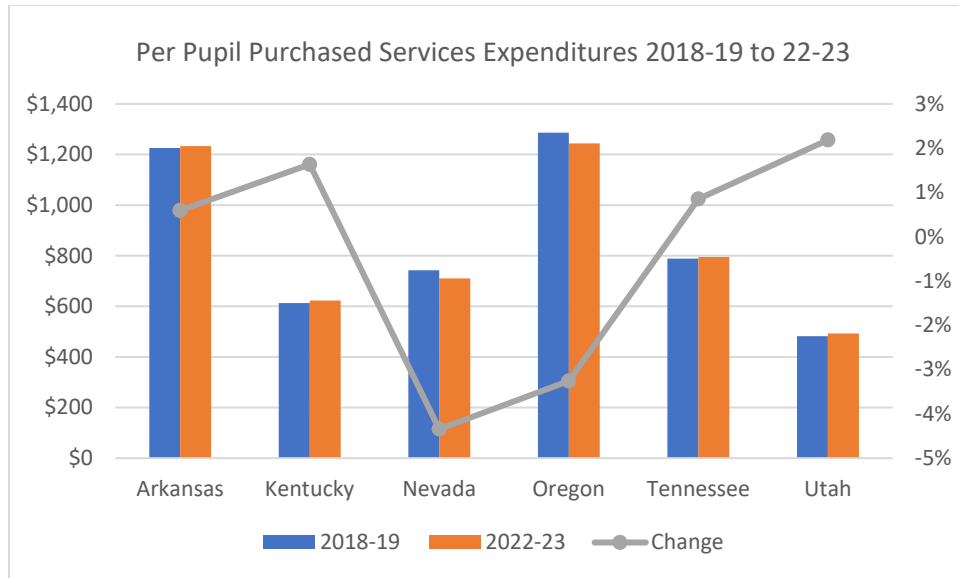
- Oregon also saw a decrease in purchased services expenditures, with a 3 percent reduction from \$1,286 to \$1,244. Although the reduction is less than Nevada's, Oregon still maintains the highest overall expenditure on purchased services per pupil among the states listed.
- Arkansas and Tennessee had slight increases of 1 percent, with Arkansas rising from \$1,226 to \$1,233 and Tennessee from \$788 to \$795, indicating stable investment in these services.
- Kentucky and Utah both experienced a 2 percent increase, with Kentucky moving from \$613 to \$623 and Utah from \$482 to \$493. Despite these increases, they still have relatively low expenditures on purchased services compared to other states.

In summary, Nevada's reduction in per pupil purchased services expenditures suggests a strategic decision to cut back on certain outsourced services or a reallocation of resources toward other areas. While Oregon and Arkansas maintain higher expenditures in this category, Nevada's decrease could reflect a focus on internalizing services or prioritizing other budgetary needs. The impact of this change would depend on how these services are managed and their effectiveness in supporting educational outcomes.

PER PUPIL PURCHASED SERVICES EXPENDITURES, 2018-19 TO 22-23

State	2018-19	2022-23	% Change
Arkansas	\$1,226	\$1,233	1%
Kentucky	\$613	\$623	2%
Nevada	\$742	\$710	-4%
Oregon	\$1,286	\$1,244	-3%
Tennessee	\$788	\$795	1%
Utah	\$482	\$493	2%

Source: NCES, 2024.



Per Pupil Supply Expenditures, 2018-19 to 2022-23

The table below compares the supply per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil supply expenditures increased by 9 percent from 2018-19 to 2022-23, rising from \$921 to \$1,001. This growth rate is moderate compared to the other states listed, indicating a steady increase in investment in supplies necessary for educational activities, such as textbooks, classroom materials, and other instructional resources.

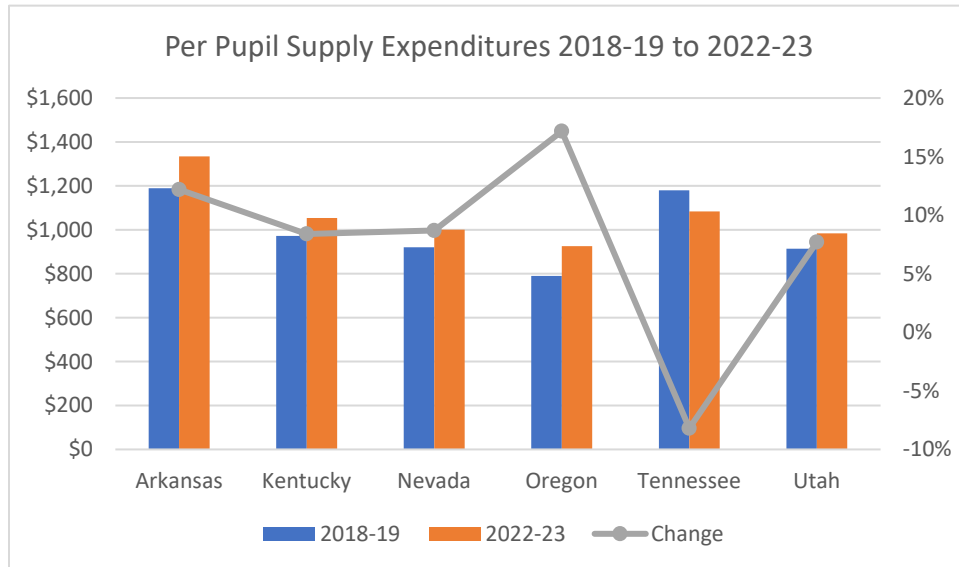
- Oregon had the highest increase in supply expenditures, with a 17 percent rise from \$790 to \$925. Despite starting from a lower base, Oregon's substantial increase reflects a strong focus on enhancing the availability and quality of instructional supplies.
- Arkansas also experienced a significant 12 percent increase, from \$1,189 to \$1,334, suggesting an emphasis on ensuring adequate supplies for students and teachers.
- Kentucky and Utah both saw an 8 percent increase in supply expenditures. Kentucky's expenditures increased from \$972 to \$1,054, while Utah's went from \$914 to \$984, indicating consistent efforts to maintain or slightly improve supply quality.
- Tennessee is the only state that experienced a decrease in supply expenditures, dropping by 8 percent from \$1,180 to \$1,084, which might suggest cost-saving measures or reallocation of funds to other areas.

In summary, Nevada's 9 percent increase in per pupil supply expenditures indicates a moderate investment in educational materials, aligning with Kentucky and Utah in terms of growth rate. However, compared to Oregon and Arkansas, Nevada's increase is less aggressive, indicating a more balanced approach to budgeting for educational supplies. This steady growth shows a commitment to providing necessary materials for education while maintaining a cautious approach to spending.

PER PUPIL SUPPLY EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$1,189	\$1,334	12%
Kentucky	\$972	\$1,054	8%
Nevada	\$921	\$1,001	9%
Oregon	\$790	\$925	17%
Tennessee	\$1,180	\$1,084	-8%
Utah	\$914	\$984	8%

Source: NCES, 2024.

**Per Pupil Total Expenditures, 2018-19 to 2022-23**

The table below compares the total per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada's per pupil total expenditures increased by 5 percent from 2018-19 to 2022-23, rising from \$11,482 to \$12,076. This increase is modest compared to some other states but indicates a steady growth in the state's investment in education.

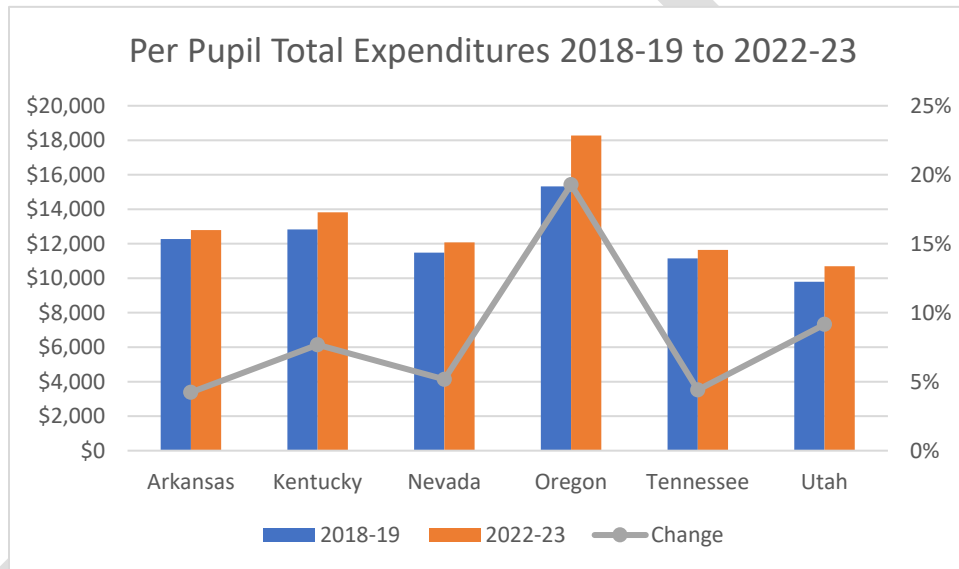
- Oregon experienced the most significant increase, with a 19 percent rise in per pupil expenditures from \$15,323 to \$18,278. This suggests a substantial investment in enhancing educational resources and services, making Oregon the highest spender per pupil among the states listed.
- Utah saw a 9 percent increase, from \$9,799 to \$10,696, indicating a strong effort to increase educational funding despite starting from a lower base.
- Kentucky also had a notable 8 percent increase, moving from \$12,833 to \$13,817, reflecting a steady commitment to improving educational funding.
- Arkansas and Tennessee both had smaller increases of 4 percent, with Arkansas rising from \$12,276 to \$12,795 and Tennessee from \$11,147 to \$11,637. These smaller increases suggest a more conservative approach to growth in educational spending.

While Nevada's 5 percent increase in per pupil total expenditures indicates a commitment to growing its educational funding, it is still less aggressive compared to Oregon and Utah. Nevada's overall per pupil spending remains on the lower side in comparison, suggesting that while there is a steady increase, the state may have room to further enhance its investment in education to reach the levels seen in Oregon.

PER PUPIL TOTAL EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$12,276	\$12,795	4%
Kentucky	\$12,833	\$13,817	8%
Nevada	\$11,482	\$12,076	5%
Oregon	\$15,323	\$18,278	19%
Tennessee	\$11,147	\$11,637	4%
Utah	\$9,799	\$10,696	9%

Source: NCES, 2024.



Per Pupil Facilities Acquisition / Construction Expenditure, 2018-19 to 2022-23

The table below compares the facilities acquisition / construction per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada experienced a 13 percent decrease in per pupil facilities acquisition and construction expenditures from 2018-19 to 2022-23, declining from \$1,634 to \$1,428. This reduction indicates a significant cutback in spending on school facilities and construction projects, possibly reflecting a strategic decision to limit capital expenditures or reallocate resources to other areas.

- Oregon had a notable increase of 25 percent, from \$2,514 to \$3,138, indicating a strong investment in expanding or upgrading school facilities. Oregon's focus on facilities could suggest an effort to improve learning environments or accommodate growing student populations.
- Kentucky also saw a significant increase of 16 percent, rising from \$922 to \$1,069. This growth in spending on facilities acquisition and construction may reflect efforts to enhance infrastructure or update school buildings.

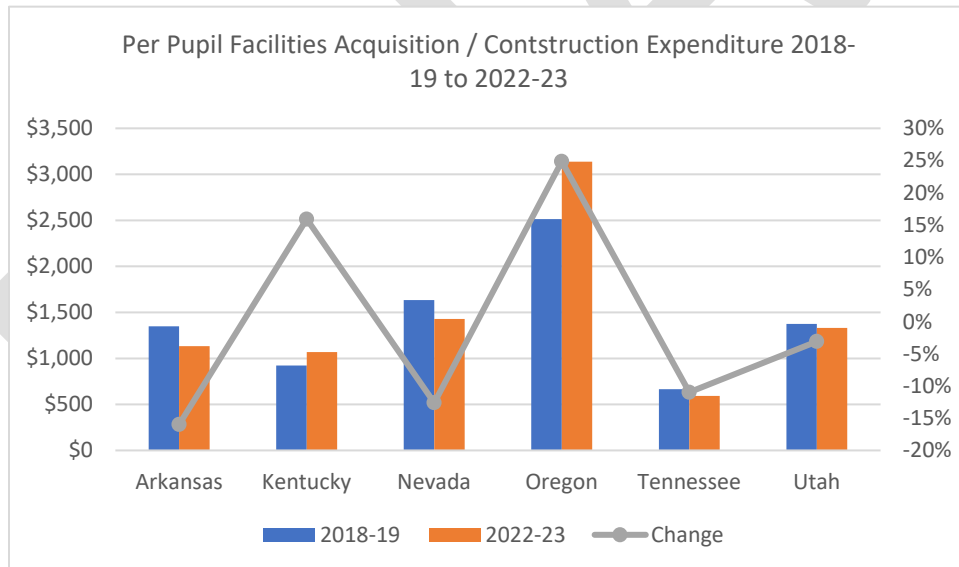
- Arkansas experienced a 16 percent decrease in expenditures, going from \$1,349 to \$1,134, and Tennessee saw an 11 percent decrease, from \$666 to \$593. Both states appear to be reducing investment in facilities, similar to Nevada, though at slightly different rates.
- Utah had a minimal decrease of 3 percent, from \$1,374 to \$1,332, indicating a relatively stable investment in facilities over this period.

In summary, Nevada's decrease in per pupil facilities expenditures suggests a reduction in capital spending, which could impact the state's ability to expand or update school infrastructure. This reduction contrasts with Oregon and Kentucky, which have increased their investment in this area, possibly prioritizing the enhancement of educational environments. Nevada's cutback might indicate a strategic reallocation of funds or a response to financial constraints, but it could also raise questions about the long-term implications for the state's educational facilities.

PER PUPIL FACILITIES ACQUISITION / CONSTRUCTION EXPENDITURE, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$1,349	\$1,134	-16%
Kentucky	\$922	\$1,069	16%
Nevada	\$1,634	\$1,428	-13%
Oregon	\$2,514	\$3,138	25%
Tennessee	\$666	\$593	-11%
Utah	\$1,374	\$1,332	-3%

Source: NCES, 2024.



Per Pupil Replacement Equipment Expenditures, 2018-19 to 2022-23

The table below compares the replacement equipment per pupil expenditures for the six comparison states for 2018-19 and 2022-23.

Nevada saw an 11 percent decrease in per pupil replacement equipment expenditures from 2018-19 to 2022-23, declining from \$116 to \$103. This reduction indicates a cutback in spending on equipment updates, such as technology, classroom furniture, or other necessary school equipment

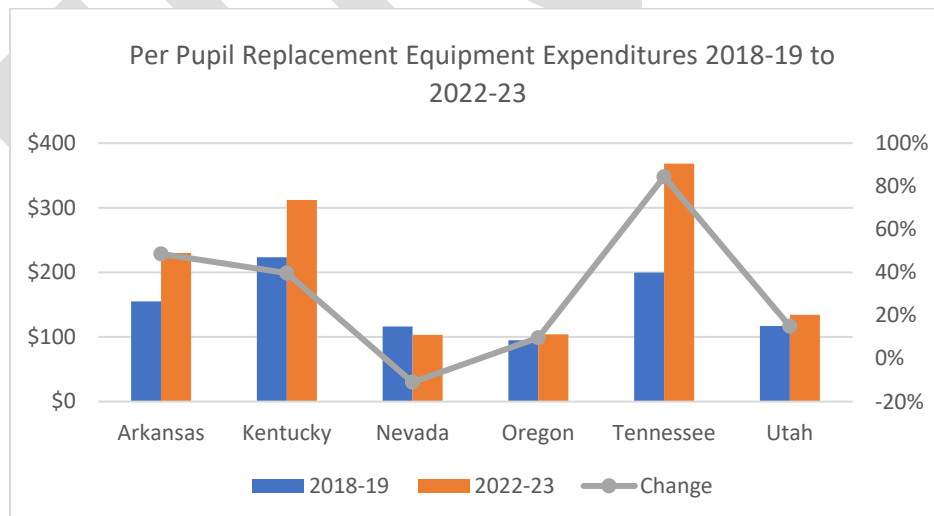
- Tennessee experienced the most significant increase in this category, with an 84 percent rise from \$200 to \$368. This suggests a strong focus on updating or replacing equipment, potentially indicating an investment in technology or other critical resources for schools.
- Arkansas also had a substantial increase of 49 percent, from \$155 to \$230, indicating a significant investment in maintaining up-to-date equipment for educational use.
- Kentucky saw a 40 percent increase, rising from \$223 to \$312, showing a continued effort to improve and replace necessary equipment in schools.
- Oregon and Utah had more modest increases of 10 percent and 15 percent, respectively. Oregon's expenditures went from \$95 to \$104, while Utah's increased from \$117 to \$134, suggesting steady but less aggressive investment in this area compared to Tennessee and Arkansas.

In summary, Nevada's decrease in per pupil replacement equipment expenditures stands in contrast to the increases seen in other states, particularly Tennessee, Arkansas, and Kentucky. This reduction could imply a prioritization of other areas in the education budget or a shift toward longer lifecycles for equipment. The potential impact of this reduction might include slower technology adoption or deferred maintenance of educational tools, which could affect the learning environment.

PER PUPIL REPLACEMENT EQUIPMENT EXPENDITURES, 2018-19 TO 2022-23

State	2018-19	2022-23	% Change
Arkansas	\$155	\$230	49%
Kentucky	\$223	\$312	40%
Nevada	\$116	\$103	-11%
Oregon	\$95	\$104	10%
Tennessee	\$200	\$368	84%
Utah	\$117	\$134	15%

Source: NCES, 2024.



Context for Comparison Data

Graduation Rate 2021-22 / Bachelor's Degree or Higher

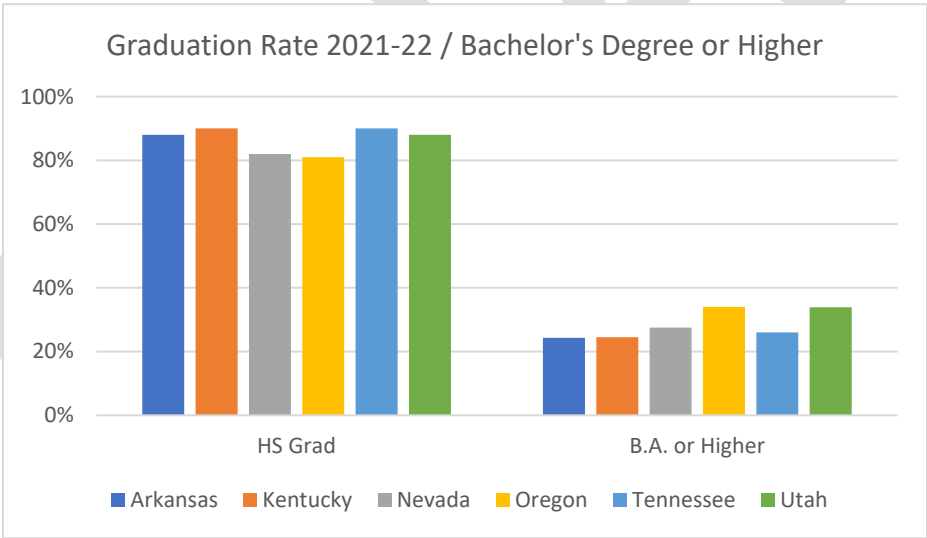
The table below shows the high school graduation rates and the proportion of residents with a bachelor’s degree or higher.

Nevada's high school graduation rate for the 2021-22 year is 82 percent, which is lower than the other states listed except Oregon at 81 percent. Despite this, Nevada has a higher percentage of individuals with a bachelor's degree or higher at 27.5 percent compared to Arkansas (24.3%) and Kentucky (24.5%). However, it still falls behind Oregon (34.0%) and Utah (33.9%) in this category. This suggests that while Nevada has a lower high school graduation rate, it has a relatively higher rate of residents obtaining higher education degrees.

GRADUATION RATE 2021-22 / BACHELOR'S DEGREE OR HIGHER

State Name	HS Grad	B.A. or Higher
Arkansas	88%	24%
Kentucky	90%	24%
Nevada	82%	27%
Oregon	81%	34%
Tennessee	90%	26%
Utah	88%	33%

Sources: NCES, 2024, U.S. Census Bureau.



COST OF LIVING DIFFERENCES AMONG COMPARISON STATES

The table below shows a cost-of-living summary for the six comparison states.

Nevada has a higher cost of living index (108.5) compared to Arkansas (85.9), Kentucky (88.9), and Tennessee (88.9). Its housing costs are high, which contrasts with the low housing costs in Arkansas, Kentucky, and Tennessee. Nevada's healthcare costs are average, higher than the low costs in Arkansas, Kentucky, and Tennessee but lower than Oregon's high healthcare costs. Overall, Nevada's cost of living is moderate, higher than the very low to low cost in Arkansas, Kentucky, and Tennessee, but lower than

Oregon's high cost of living. Utah has a similar cost of living index to Nevada but with slightly higher healthcare costs and a moderate to high overall cost.

COST OF LIVING DIFFERENCES AMONG COMPARISON STATES

State	Cost of Living Index	Housing Cost	Healthcare Cost	Overall Cost of Living
Arkansas	85.9	Low	Low	Very Low
Kentucky	88.9	Low	Low	Low
Nevada	108.5	High	Average	Moderate
Oregon	115.1	High	High	High
Tennessee	88.9	Low	Low	Low
Utah	108.4	High	Slightly High	Moderate to High

Sources: U.S. Bureau of Economic Analysis (BEA) – Regional Price Parities (RPP), 2023.

SUMMARY TABLE OF KEY HEALTH METRICS

Nevada's health outcomes are generally better than those in Arkansas, Kentucky, and Tennessee but still face challenges. With a life expectancy of 79.3 years, Nevada is near the national average, surpassing the lower life expectancies of Arkansas (75.5), Kentucky (75.5), and Tennessee (75.6). While Nevada has moderate rates of chronic conditions, access to healthcare is limited, especially for children. In contrast, Oregon (79.9 years) and Utah (80.2 years) have better health outcomes, with lower rates of smoking, obesity, and chronic diseases, and strong focus on preventive care and children's health.

SUMMARY TABLE OF KEY HEALTH METRICS

State	Life Expectancy	Adult Health Outcomes	Children's Health	Overall Health
Arkansas	75.5 years	High rates of chronic diseases, obesity	Poor, high infant mortality and obesity	Poor
Kentucky	75.5 years	High smoking, obesity, and chronic disease rates	Poor, high child poverty and obesity	Poor
Nevada	79.3 years	Moderate chronic disease rates	Struggles with uninsured children and obesity	Moderate
Oregon	79.9 years	Low obesity and smoking rates	Good vaccination and child health, mental health concerns	Good
Tennessee	75.6 years	High rates of chronic disease, obesity	High child poverty and infant mortality	Poor
Utah	80.2 years	Low smoking, obesity, and chronic disease	Low infant mortality, good child health	Excellent

Source: National Center for Health Statistics, 2024.