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September 18, 2026

Dr. Victor Wakefield
State Superintendent of Public Instruction
700 E. Fifth Street
Carson City, NV 89701

PETITION TO ELIMINATE OR SUSPEND SPECIFIED REPORTING REQUIREMENTS

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

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

To comply with the implementation guidance provided in Guidance Memorandum 26-11, this cover letter is followed by a set of individual reports that should qualify as separate submissions under 26-11.

Contact Information

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General Statement of Administrative Burden & Necessity

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

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

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

Reporting Requirements Nominated for Action

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

Local Review Certification

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

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

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

Dated this 18th day of September, 2026.

Respectfully submitted,



AJ Feuling

President, Nevada Association of School Superintendents (NASS)

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

Overview

These following reports center on the state's Nevada Report Card, including two reports for suspension (i.e., require a petition) and two recommended process changes to consolidate current data collections.

A note about the structure of this petition as it differs from the prior submission. The following is similar to the analysis shared in July that formed the initial petition NASS submitted to the Superintendent of Public Instruction with one important exception. The July petition included action specific to reports or data collections required by statute and administrative code. For this submission, in addition to recommendations related to reports required by statute, each individual report includes space for any process changes. A recommended process change is requisite for a given action under the petition authority or the recovery of time without the required petition. A process change refers to actions that fall under existing statutory authority but may carry resource impacts for NDE. For example, there are recommendations in the class size reports that include a process change to the Nevada Report Card to maintain public transparency if the petition to suspend a specific set of reports is to be pursued.

1a. Career and Technical Education: Average Daily Attendance

- Source of Requirement: NRS 385A.290 (3)
- Summary of the Requirement:
    - The annual report on accountability includes a set of metrics specific to Career and Technical Education, including the average daily attendance of pupils enrolled in CTE (via the DF40).
- Recommendation: Suspend
    - The reports are not required by federal law (e.g., Perkins); and
    - The administrative burden of producing the reports is not justified by its use.
- Explanation/Justification:
    - Districts and charter schools comply with this requirement by submitting a unique data collection via the DF 40 - CTE Student Average Daily Attendance.

      CTE data are widely utilized by the state. These data include course and program enrollment, career clusters pursued, certificate or skill attainment, and graduation rate. A combination of federal and state reporting provides actionable information to develop regional and state incentives to ensure pathway alignment with workforce needs. CTE-ADA is one report, requiring a significant amount of time to develop, with little to no usage to justify the time spent to develop.

      The Nevada Report Card displays information specific to CTE. This includes enrollment by race/ethnicity, program completion, and average daily attendance. Through various workgroup discussions, CTE average daily attendance stood out as a data collection that requires a significant amount of time to develop with no known utilization other than transparency. It is also unique to CTE, meaning other programs (e.g., GATE) don't require ADA reporting.

1b. Career and Technical Education: Average Daily Attendance Process Change

- No changes to existing processes are recommended.

2a. Short Term Substitutes

- Source of Requirement:
  - Districts: NRS 385A.230 (3) and (4)
  - School: NRS 385A.440 (3) and (4)
- Summary of the Requirement:
  - Districts and schools are required to report the number of persons employed as a substitute teacher for less than 20 consecutive days, designated as short-term substitute teachers (via DF39).
- Recommendation: Suspend
  - The reports are not required by federal law;
  - There is a reliable proxy for this information in the existing teacher average daily attendance available on the Report Card; and
  - The administrative burden of producing the reports is not justified by its use.
- Explanation/Justification:
  - Completion of this required data collection necessitates a significant amount of manual work at the district. An example was provided where a member of the district had to manually count the periods, days, and subject area for one specific substitute to determine if that substitute met the 20-day threshold in law. Given the amount of manual work required, it also introduces a significant amount of human error rendering the outcome less reliable.

    Additionally, these data are reported via the Report Card; however, specific information related to short-term substitutes is only available if the user elects to see a “more detailed report”. Long-term substitutes are reported on the Report Card’s landing page under Personnel. Teacher average daily attendance is reported on the Report Card and contains similar information.

2b. Short Term Substitutes: Process Change

- No changes to existing processes are recommended.
- It is noted that NDE is working on an enterprise solution that integrates workforce data into the state’s database. Once complete, this will become the single source for workforce data, streamlining many reports and an example of "collect once, report multiple times” best practice.

3a. Chronic Absenteeism and Average Daily Attendance

- There are no recommendations that require a petition.

3b. Chronic Absenteeism and Average Daily Attendance: Process Change

- Source of Requirement:
  - NRS 392; NRS 385A
- Summary of the Requirement:
  - Chronic Absenteeism: Districts/Charters use the Chronic Absenteeism report in IC to prepare and upload their data files.
  - Average Daily Attendance: Districts/Charters pull their data from Infinite Campus to complete the DF17 for the Accountability Report Card
- Recommendation: Consolidate
  - Sunset the DF17 ADA collection and use the Chronic Absenteeism file as the single data source for attendance related reporting.
- Explanation/Justification:
  - The Working Group explored the implications of using the Chronic Absenteeism (CA) file for all attendance related reporting. It found minor differences between the CA file and ADA (DF17) that may be a function of the business rules (e.g., 100-day requirement for DF17 versus the full year for CA). The group is comfortable with this variance.
  - The Reporting Working Group recommends a note of explanation appear on the report card regarding the shift from the 100-day business rule to full school year under CA for the public, especially if they are comparing data across years.
  - Given the consolidation of two data collections into one, the goal is for accurate and timely district reporting using the CA process rather than two separate collections.
  - This consolidation reflects the “collect once, report multiple time” best practice.

4a. Discipline Reporting

- There are no recommendations that require a petition.

4b. Discipline Reporting: Process Change

- Source of Requirement:
  - NRS 392 (via the "AB285" collection); NRS 385A.250 (via the DF50)
- Summary of the Requirement:
  - NRS 392 establishes expectations for public schools related to the planning and reporting of student behavior, assigns the Nevada Department of Education with certain responsibilities related to the reported data, and establishes key definitions.
  - NRS 385A is a longstanding collection of student behavior data that is reported publicly via the Nevada Accountability Portal.
- Recommendation: Consolidate, create a single source for discipline data to meet all reporting needs.
  - Sunset the DF50-Discipline data collection and utilize the AB285 collection as the single source of discipline data that is used to populate all reporting requirements.
  - This recommendation would take effect for the data collection cycle in August 2027, based on the School Year 2026-2027. This provides time to make necessary adjustments and training of districts to utilize the open-source coding to pull this information directly from Infinite Campus.
- Explanation/Justification:
  - Districts currently report the same or similar disciplinary data through two distinct events - DF50 and AB285.
  - The Behavior Working Group (as established by NDE) shared their findings with the Report Working Group and it was determined that the AB285 data collection can meet the needs of the legacy reporting under NRS 385A.
  - There is no impact on compliance nor district support activities if this recommendation is adopted.