Information

President
Andrew Feuling

Vice President
Tim Logan

Secretary-Treasurer
Jhone Ebert

Executive Director
Susan Keema
Phone: (775) 690-1720
skeema@nvsupts.org

District Superintendents
Carson City
Andrew Feuling
Churchill
Blake Cooper
Clark
Jhone Ebert
Douglas
Angelo Alvarado
Elko
Clayton Anderson
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Storey
Dan Sadler
Washoe
Tiffany McMaster
White Pine
Angela Angelopoulos
State Charter Authority
Melissa Mackedon

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

- AJ Feuling, Superintendent Carson City School District and President Nevada Association of School Superintendents
    - Email: afeuling@carson.k12.nv.us
      Phone: (775) 283-2000

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 two reports are designated for action in the School District Reporting Analysis. Specifically, each report is recommended for "elimination - pending" a conversation with the report's receiving entity. On behalf of the Reporting Working Group, the ESC held multiple conversations with each entity to understand the report's use, shared the recommendation with the entity, and incorporated the feedback in this report.

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. 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. Physical Conditions of Schools Report

- Source of Requirement: NAC 387.501, via State Board of Education (SBE) authority established in NRS 385.080
- Summary of the Requirement:
    - By August 1 of each year, each school district shall provide a report to the SBE identifying the physical condition of each school within the district.

- Recommendation: Suspend
    - This report is not required by federal law;
    - No impact on the accountability of public school for their quality; and
    - The administrative burden of producing this report is not justified by its use.
- Explanation/Justification:
    - The annual reporting requirement for school facility conditions was established in 1999 by the State Board of Education following a U.S. General Accountability Office study on nationwide infrastructure degradation. It appears the report was intended to inform discussions, recommendations, and potentially funding levels to support replacement of aging school infrastructure.

      As state oversight has transitioned to the Pupil-Centered Funding Plan (PCFP) budgeting functions have shifted from an expenditure-based model to a revenue-driven model. The original reporting mechanism no longer aligns with current strategic infrastructure planning. Therefore, it is recommended that this report be suspended.

      It should be noted that removing this state-level reporting requirement does not affect or remove separate obligations for individual school districts to maintain internal facility inventories to support capital improvement planning and local bond initiatives.

1b. Physical Conditions of Schools Report: Process Changes

- No changes to existing processes are recommended.

2a. Reporting on Financial Aid Activities (Treasurer's Office)

- Source of Requirement: NRS 388.224(5)
- Summary of the Requirement:
    - Every July 1, the board of trustees of a school district and governing body of a charter school report the number of 12th grade pupils or parents/guardians that participate in FAFSA completion events, those receiving assistance, and those completing the FAFSA. If available, the report includes the number of pupils offered, accepted, and the type and amount of aid.
- Recommendation: Suspend
    - This report is not required by federal law;
    - It is redundant;
    - No impact on the accountability of public school for their quality; and
    - The administrative burden of producing this report is not justified by its use.
- Explanation/Justification:
    - Removing barriers to college access has long been a priority for the state and the intent behind NRS 388.224 was to further Nevada's goal of increasing completion of the Free Application for Federal Student Aid and knowledge of Nevada's Kick Start Program.

      The Districts, charters, and Treasurer's Office have an active set of strategies to raise awareness and completion of associated opportunities for financial aid. Districts and charter schools report numerous events in the schools and community dedicated to raising awareness and completion of financial aid resources. The Treasurer's Office maintains a website (Resources - NVigate) dedicated to the resources available to Nevada students and their families/guardians, staffs four full time College Navigators that participate in school and community events, offers specific programming for rural Nevada communities that includes information nights, and invites students/families/guardians to scheduling meetings with their staff.

      In discussion with a representative from the Treasurer's Office, the report required by NRS 388.224(5) appears to be submitted for compliance purposes only, is not uniformly submitted, and is not used to inform decisions due to the active engagement of the Treasurer's Office with schools and communities. The Treasurer's Office supports the recommendation.

      Any action on the report required by NRS 388.224(5) is only contemplated because the report, itself, does not add value to the overarching goal of college access - it is not utilized given the ambitious work of the Treasurer's Office and our school system to ensure access to financial aid resources.

2b. Reporting on Financial Aid Activities (Treasurer's Office)

- No changes to existing processes are recommended.