

**NEVADA DEPARTMENT OF EDUCATION
COMMISSION ON SCHOOL FUNDING
JUNE 12, 2020
9:00 A.M.**

Meeting Location

Due to the circumstances created by the COVID-19 pandemic, the Commission on School Funding met via videoconference. In accordance with Governor Sisolak's State of Emergency Directive 006, Section 1, no physical location was designated for this meeting. The meeting was livestreamed on the Nevada Department of Education's (NDE) website.

SUMMARY MINUTES OF THE COMMISSION MEETING

COMMISSION MEMBERS PRESENT

Via Videoconference

Dusty Casey
Andrew J. Feuling
Jason A. Goudie
Guy Hobbs
Dr. David Jensen
Paul Johnson
Mark Mathers
Punam Mathur
Dr. R. Karlene McCormick-Lee
Jim McIntosh
Dr. Lisa Morris-Hibbler

DEPARTMENT STAFF PRESENT

In Las Vegas

Jessica Todtman, Chief Strategy Officer

In Carson City

Heidi Haartz, Deputy Superintendent of Business and Support Services
James Kirkpatrick, Administrative Services Officer III
Beau Bennett, Management Analyst IV
Megan Peterson, Management Analyst III

LEGAL STAFF PRESENT

Greg Ott, Chief Deputy Attorney General

SUBJECT MATTER EXPERTS PRESENT

Jeremy Aguero, Applied Analysis

AUDIENCE IN ATTENDANCE

Via Videoconference

1: CALL TO ORDER; ROLL CALL

Meeting called to order at 9:00 A.M. by Commission Chair R. Karlene McCormick-Lee. Quorum was established.

2: PUBLIC COMMENT #1

Sylvia Lazos, Nevada Immigrant Coalition submitted public comment regarding implementation of the Pupil-Centered Funding Formula. *(A complete copy of the statement is available in Appendix A)*

John Vellardita, Clark County Education Association submitted public comment regarding implementation of the Pupil-Centered Funding Formula. *(A complete copy of the statement is available in Appendix A)*

Rebecca Garcia, Nevada PTA submitted public comment regarding implementation of the Pupil-Centered Funding Formula. *(A complete copy of the statement is available in Appendix A)*

Lola Brooks, President of the Board of Trustees, Clark County School District, submitted public comment regarding the Hold Harmless Provision. *(A complete copy of the statement is available in Appendix A)*

Dr. Jesus Jara, Superintendent of Clark County School District, submitted public comment regarding the Commission on School Funding. *(A complete copy of the statement is available in Appendix A)*

3: APPROVAL OF COMMISSION MEETING MINUTES

Member David Jensen moved to approve the May 14th, 2020 Commission Meeting minutes. Member Paul Johnson seconded. Motion passed.

Member Jim McIntosh moved to approve the May 15th, 2020 Commission Meeting minutes. Member Andrew Feuling seconded. Motion passed.

4: PRESENTATION ON UPDATES TO THE PUPIL-CENTERED FUNDING PLAN MODEL

Jeremy Aguero, Applied Analysis, provided an Update regarding the Pupil-Centered Funding Plan (PCFP) Model.

Mr. Aguero stated that there are two versions of the model; the blueprint schematic and the model itself. The blueprint is a series of spreadsheets that allows for changes to elements, testing within the model, and comparison between the PCFP model and the Nevada Plan. Two changes to the blueprint since it was last presented to the Commission include updated information relating to enrollment for each district and charter schools, and a calculation for local revenue funds that are transferred to charter schools. Mr. Aguero noted that the current model reflects funds allocated to weighted categories of pupils using State sources only. Funds that will be distributed to weighted categories of pupils from local allocations or allocated at the discretion of districts are not included.

The enrollment summary outlines the most recent numbers for school districts and charter schools. Allocations have also been updated in accordance with information provided by the Nevada Department of Education (NDE). The schedule of allocations has been updated to include outside payments to charter schools. Previously, \$64 million had been identified as allocated to districts that has now been properly accounted for as an allocation to charter schools.

Referring to the model rather than the blueprint, Mr. Aguero noted that updates had been made regarding enrollment: statewide, inclusive of charter schools, and by individual school. Information is included by cohort, including the percentage that each school makes up of a given weighted category, and the percentage that a particular category makes up of all weighted portions.

Regarding concerns that the numbers within the blueprint continue to change, Mr. Aguero noted that the vast majority of the changes being seen have little to do with the Pupil-Centered Funding Plan (PCFP) Model itself. Instead, they are assumed under the Nevada Plan. Over 50 schedules have been added to explain how funds are allocated, and the complexity is not due to the PCFP, but rather with the intricacies of the Nevada Plan.

In response to concerns that the PCFP is less transparent than the Nevada Plan, Mr. Aguero stated that the PCFP is equally, if not more, transparent. He noted that administrative instructions are provided for each element of the PCFP model, including statutory references, source material, update instructions, and a log that tracks changes to

the model. The PCFP has an allocation waterfall that demonstrates the simplicity of the process and explains what happens when funds are added to the model. Mr. Aguero illustrated the funds that make up the K-12 Nevada Education Fund, and what happens when funds are added as they move through the waterfall. He noted that core tenant of the PCFP is that base funding must remain whole and does not erode. It must increase by inflation and enrollment growth.

Chair McCormick-Lee noted that much of the complexity seen is in part due to trying to understand where school funding is currently.

Member McIntosh asked for clarification regarding base funding: the Governor planned a 3% increase for teacher salaries in the 2019-20 biennium and most salaries will be funded from the base; in the event that the base is inadequate in a given year, what would the mechanism be for providing a 3% increase in salaries if the base does not grow, and in turn, the Governor wanted to add to the base without having it move through the waterfall? Mr. Aguero noted that they would have to make an adjustment to the funds.

Member Dusty Casey requested clarification regarding the waterfall and keeping funds whole. Mr. Aguero responded that the goal was to preserve the base. The default assumption of the PCFP is that the base cannot erode, and that funds cannot be taken from the base to begin a new program. Once the base is whole, funding would flow to the weights. The default position is the structure for the allocation of the funds.

Member Lisa Morris-Hibbler raised concern with funding shortages under the model that included the hold harmless provision and charter schools. Mr. Aguero noted that the PCFP is meant to work regardless of the amount of funds in the model. He added that SB 543 is constructed to preserve dollars over time. The hold harmless provision recognizes that inequities within the Nevada Plan have set the bar for some districts at particular levels, and legacy challenges from the Nevada Plan cannot be instantly eliminated. The Commission must determine if the right amount of money is being spent, what the right amount of money is, and how it should be funded.

Responding to Member Johnson, NDE Deputy Superintendent of Business and Support Services Heidi Haartz stated that the Commission has two funding focuses. The first is to make recommendations to the Legislature and the Governor for the successful implementation of the PCFP, including policy or timeline changes and reviewing the existing funds and funding sources for education. The second focus would be defining optimal funding and the cost of activities within optimal funding. If the Commission makes recommendations regarding optimal funding, it also must determine how to bring the State to optimal funding levels within ten years. Member Johnson raised concerns that discussions regarding optimal funding may be postponed until too late in the process to allow the Commission to make relevant changes impacting implementation.

Member Jensen noted that enrollment is currently taken on quarterly average enrollment; he inquired how the waterfall calculates for enrollment. Mr. Aguero responded that it is currently calculated on a single point in time enrollment count.

Member Jason Goudie asked if it was possible for the Commission to recommend an increase in funding. Deputy Superintendent Haartz responded that if the Commission recommends that the model be changed to increase the adjusted base budget per-pupil amount to a specific dollar value, the Commission would also need to indicate from where funds would be diverted from in order to increase the adjusted base per-pupil amount because everything in the model needs to be funded with dollars already in the Nevada Education Fund.

Member Casey commented on the funding within categories C and D and asked about the funding to charter schools. Deputy Superintendent Haartz noted that, under the PCFP, charter schools will be paid at the applicable adjusted base per pupil funding amount based on where the school is located, unless the student is enrolled full time in a program of distance education, in which case they would be paid at the State per-pupil funding amount. Transportation funding is included within category B. Under the Nevada Plan, categories C and D represent the basic support guarantee less transportation for charter schools. Member Mark Mathers noted that special education funds allocated from the State to Washoe County increase under the PCFP.

5: DISCUSSION OF PRELIMINARY RECOMMENDATIONS FOR THE SUCCESSFUL IMPLEMENTATION OF SENATE BILL 543

Heidi Haartz, Deputy Superintendent of Business and Support Services, Nevada Department of Education conducted a [PowerPoint](#) presentation regarding Recommendations for the Successful Implementation of Senate Bill 543.

Chair McCormick-Lee noted that the Commission meeting scheduled for July 13, 2020 would also be an opportunity to discuss recommendations, which are due to the Governor and Legislature on or before July 15, 2020.

Member Johnson supported the recommendation presented by WestEd regarding reporting. **Member Johnson moved to recommend that reporting dates be determined by NDE in collaboration with school districts, rather than encoding due dates within statutes. Member Punam Mathur seconded the motion. Motion passed.**

Further discussing recommendations made by WestEd, **Member Johnson moved to recommend consolidating personnel count reporting requirements as determined by NDE in consultation with the school districts. Member Mathur seconded.** Member Jensen wanted to ensure that reporting requirements would be consolidated effectively by NDE. Member Johnson noted that NDE would need to work collaboratively with school districts prior to moving forward, rather than NDE identifying items and dictating instruction. Chair McCormick-Lee amended the motion to include that staff reporting include limited categories and the elimination of the requirement to designate the number of staff dedicated to each category. Member Feuling suggested that one report, rather than one reporting deadline, may also alleviate concerns.

Member Johnson amended his motion to have NDE work in consultation with school districts to consolidate the personnel reporting requirement to include categorization and one reporting deadline, and to work to eliminate the requirements to identify the number of staff dedicated to each service for each subcategory; Member Mathur seconded the amendment. Motion passed.

Member Feuling moved to recommend that Section 12.5(e) of SB 543 be replaced to report annual expenditures on professional development by funding source in each district. Member Johnson seconded. Motion passed.

In relation to the SB 543 provision for modified allocations if enrollment significantly changes, the Commission discussed the impact of various enrollment shifts. Members noted that 5% is a significant change to a school district, and there was support for a 3% boundary. Megan Peterson, Management Analyst III, Nevada Department of Education, noted that district qualification for the enrollment hold harmless has declined, and it is more frequently used by charter schools. Member supported delaying a recommendation on this item until the July meeting.

Member Jensen requested that cost adjustment factors the Necessarily Small School Adjustment and the Small District Equity Adjustment, be deliberated upon during the July meeting, once NDE has had an opportunity to return with additional information.

Regarding Pupil County for Payment Purposes, Members Johnson and Jensen supported a single count day. Member Feuling supported multiple count days, or the recognition that enrollment shifts over the course of a school year. Member Goudie agreed and supported an average daily enrollment, despite its difficulties. Chair McCormick-Lee confirmed that the current process is an average daily enrollment reported quarterly and audited annually, with a fiscal year “true-up,” and that failure by the Commission to make a specific recommendation would uphold the current process.

Deputy Superintendent Haartz clarified that, under SB 543, payments will be made to school districts and charter schools based on 1/12 of the annual apportionment amount; they will receive an equal amount each month of the year. Under SB 543, the average daily enrollment information for the year would be compared to ensure that they were paid appropriately for the number of students enrolled during the school year. For gifted and talented education, the Department uses October 1, however there is a delay between the day of measure and the funding

that is distributed to school districts and charter schools. For example, the students deemed eligible for special education as of October 1 of the 2020-21 school year, under the current funding model, would not be reflected in the payments until the following school year; there is a full year delay between the count and the distribution of those funds. The same is true for gifted and talented. Because program and eligibility requirements may be changing for English Learners and students considered At-Risk, the date of measure for those categories must be established. Deputy Superintendent Haartz suggested that NDE will return with additional information on this item during the July meeting.

Regarding the ending fund balance, Member Mathers sought clarification regarding whether SB 543 referred to all school district funds or specifically the general fund or funds that receive property taxes. **Member Mathers moved to recommend that the ending fund balance apply only to school districts' unrestricted general fund, excluding debt service, proprietary funds, and the net proceeds of minerals.** Deputy Superintendent Haartz clarified that SB 543 indicates the purpose of sending excess funds back to a county is to mitigate the cyclical effects of the mining industry. Member Mathers noted that by assigning the ending fund balance to the unrestricted fund balance, funds such as the stabilization fund would be excluded. **Member Johnson seconded. Motion passed.**

Regarding Section 77 of SB 543 and the Education Stabilization Account, Deputy Superintendent Haartz clarified that it includes a provision that would temporarily reset the 16.6% threshold for transfer of funds to the Education Stabilization Account. If a school district has an unrestricted general fund ending fund balance as of June 30, 2020 that is greater than 16.6%, the school district may maintain that ending fund balance and no transfer is needed to the Education Stabilization Account. At the end of the next fiscal year, that elevated ending fund balance becomes the threshold. When a school district's balance falls below the 16.6%, the ending fund balance threshold would remain at 16.6%. Member Jensen inquired what that means for districts that are currently above 16.6%. Member Johnson responded that a higher threshold acts as the maximum until the fund balance dips below that amount, at which time its lower balance becomes the new maximum, until such time that the fund reaches 16.6%. The Commission was comfortable with Section 77 as currently written in SB 543.

Regarding the true up, **Member Jensen moved to recommend that NDE continue to have the opportunity to seek a supplemental appropriation during the second year of the biennium. Member Johnson seconded. Motion passed.**

[Convenience Break]

Regarding the Education Stabilization Fund, Members discussed seed money in the stabilization account and adequate funding. Deputy Superintendent Haartz noted that at the end of each fiscal year, unexpended funds in the State Education Fund would be transferred to the Education Stabilization Account, with the exception of federal funds, funds for maintenance of effort, and other funds not distributed through the PCFP. The Commission was comfortable with the Education Stabilization Fund as currently written in SB 543.

Regarding the Hold Harmless Provision, Vice Chair Guy Hobbs and Member Morris-Hibbler raised concerns regarding the impact of the Hold Harmless, and Members discussed potential impacts and inequities between school districts. Chair McCormick-Lee confirmed that the Hold Harmless references the allocated budgeted dollars for fiscal year 2020 (FY20) prior to any budget reductions related to the financial crisis created by the COVID-19 pandemic.

Regarding the cost of living allocation and adjusting for inflation, Chair McCormick-Lee asked if cost of living increases would affect the Hold Harmless. Deputy Superintendent Haartz noted that the allocation for each school district for the Hold Harmless would be the allocation each school district received in fiscal year 2020. The Hold Harmless related to declines in enrollment goes into effect when the school district has experienced two years of declining enrollment. Mr. Aguero added that the base will be adjusted by inflation and enrollment; the Hold Harmless does not have any inflation adjustment included. Member Johnson suggested that inflation for school funding should include hyperinflation; Members discussed inflation and school funding as it relates to the Hold Harmless extensively. To address inflation concerns, the Commission will be examining cost adjustments and have further discussions regarding optimal funding. Member Casey noted that the Commission should examine

the intended targets for the Hold Harmless provision. The Commission decided to postpone further discussion and recommendations regarding Hold Harmless until its July meeting.

6: FUTURE AGENDA ITEMS

The Commission indicated that it would continue discussions regarding recommendations for the successful implementation of SB 543 at its July meeting.

7: PUBLIC COMMENT #2

Lindsey Dalley, Moapa Valley Community Education Advisory Board, submitted public comment regarding rural schools. *(A complete copy of the statement is available in Appendix A)*

8: ADJOURNMENT

Meeting adjourned at 1:57 P.M.

Appendix A: Statements Given During Public Comment

1. Sylvia Lazos, Nevada Immigrant Coalition submitted public comment regarding implementation of the Pupil-Centered Funding Formula.
2. John Vellardita, Clark County Education Association submitted public comment regarding implementation of Pupil-Centered Funding Formula.
3. Rebecca Garcia, Nevada PTA submitted public comment regarding the implementation of the Pupil-Centered Funding Formula.
4. Lola Brooks, President of the Board of Trustees, Clark County School District, submitted public comment regarding the Hold Harmless Provision.
5. Dr. Jesus Jara, Superintendent of Clark County School District, submitted public comment.
6. Lindsey Dalley, Moapa Valley Community Education Advisory Board, submitted public comment regarding rural schools.

Item A1, Nevada Immigrant Coalition

Dear Commission Members:

First and foremost, thank you for your hard work serving on this commission.

With the budget shortfall that is being projected and the likely cuts to the K12 budget, we recommend that the Commission advise the Governor to postpone implementation of SB543.

The Commission has advanced many key concepts that will improve school funding for Nevada. However, our organization, representing working class and immigrant families, has faulted the Arguero formula for taking monies that now go to the children who suffer structural poverty and racial isolation (an equity concept) and spreading those limited funds via per pupil weights (based on an equality concept) to all students, from the richest zip codes to the poorest.

This is NOT the time to disinvest in historically poor communities of color. SB 543, without a grandfather clause, wipes out Zoom and Victory successes and almost a decade of hard work in recreating failing schools in our racially isolated and poorest zip codes, that is, the Indian reservations, previously de jure segregated neighborhoods, and co-ethnic immigrant enclaves. Our youth are demonstrating for racial and economic justice. Let's listen to the righteous call for justice and preserve quality education opportunities for our poorest students.

SB543 makes sense only with an investment in transition to a new formula so that no population is made worse off than before. The economic collapse caused by Co-vid19 unfortunately means that this Commission should not green light SB543.

Respectfully submitted,

Sylvia R Lazos
Education subcommittee

Item A2, Clark County Education Association

SB 543 Commission Members:

As the Commission begins to make recommendations to the Governor and the Nevada Legislature, the Clark County Education Association (CCEA) would like to enter into the record a statement followed with four (4) recommendations for the Commission to consider.

CCEA represents over 18,000 educators in CCSD, the largest number of educators in the State of Nevada. Our district is the largest, poorest, and most diverse in terms of students and has 70% of Nevada's public education students. We supported this legislation when it was passed, with the exception of our primary concern-that it was not funded. Out of all the recommendations, the most critical is the one the Commission will make regarding funding. Today, with the economic collapse our State is experiencing, there is tremendous pressure for us to not look at the reality of the true cost to bring our education system up to adequate funding levels-but to default to a cynical view that says "this is not the time". We believe there is no other time, nor moment, in history to put forward what our schools and students really need regarding funding.

As the Governor and Legislators receive your report, they will be consumed with dealing with the significant loss in State revenue this COVID-19 crisis has created. Today, their direction is cuts. However, we believe there is not enough budget cuts one can make to bridge the fiscal gap without decimating our public education delivery system. We believe that any budgets cuts must take place in the context of new revenue and restructuring the current revenue system. And that discussion should be done in the context of rebuilding Nevada's economy. Our economy must be more diversified, and key to that is having an educated workforce for today's economy to attract economic growth. And there will be no educated workforce at the levels needed to build a new economy without improving our public education system.

Accordingly, we are suggesting that the Commission do the following:

1. Make funding recommendations that reach adequate levels so that legislators know exactly how much funding our public school system really needs. Assign adequate funding levels for basic per pupil allocation as well as the four weights. We are asking that a recommendation propose full adequate funding levels now- not over a period of time. In other words, what would the cost be today if our system was funded to adequate levels? The Pupil Centered Funding Plan is supposed to address the 'needs' of students. We trust you will issue a recommendation regarding funding under the parameters outlined under SB543. However, we are asking that you put before the public, at a time when significant cuts to education are being proposed, what the real cost to adequately fund education would be under the new funding formula.
2. On the hold harmless issue, we have heard comments to build in an inflation factor after the baseline year. We disagree with this. Until the formula indicates that those school districts should receive more funding beyond the hold harmless level, it should remain the same level without inflation. Otherwise, if we build in an inflation factor, then that money will be taken from the formula's allocation for CCSD and as a result the District with the largest population of the most diverse and poorest will be shortchanged again. Furthermore, if Districts who are part of the hold harmless experience a shortfall in funding, then we would advise those Districts to look at their ending fund balances if they need more funding above the hold harmless level. Why do we propose this? Because that is what CCSD has always done year after year and as a result CCSD has the lowest ending fund balance state wide of all school districts at 2.25%, where other Districts have anywhere from 6% -16%.
3. The definition of at-risk should be academically centric and focus on students who systematically are underperforming and are at the bottom proficiency levels. In 2017, SB178 was passed and it targeted the bottom quartile student proficiency to allocate resources with prescriptive instructional intervention strategies to raise academic performance for those students of greatest needs. Given the significant impact any change in the definition of at-risk could be, we suggest the Commission's recommendation require further study and input from education stakeholders and experts to work on this issue.

4. Finally, we do not agree with any proposal that would delay the implementation of the new funding formula. The Commission should move forward with its recommendations and not alter that implementation date.

In closing, your charge and ultimate recommendation is being done in the most challenging times that our public education system has faced. However, it is also an opportunity to plow ahead and make structural changes to fund our educational system as part of a strategy to rebuild Nevada's economy. And though addressing Nevada's economy is not your charge-what recommendations you make will have an impact in that context.

The next significant decision will be before Governor Sisolak, who pledged when running for office to make our education system a number one priority. Please provide a recommendation of what the real cost to adequately fund our schools would be under the new formula. As we have shared with you in the past, CCEA will be advocating and organizing to fight for the needed revenue our students need.

Thank you,

John Vellardita, Executive Director
Clark County Education Association

Item A3, Nevada PTA

For the record Rebecca Garcia, President of the Nevada Parent Teacher Association. We are grateful for the hard work of the Commission. A new funding formula that puts the needs of Nevada students at the forefront is a vital step to improve educational outcomes in Nevada. A straightforward formula that provides clear tracking and transparency is essential to increase community trust. That transparency and trust will lead to a greater understanding of how resources are allocated and what funding is needed to support student success.

As implementation moves forward it is essential to honor the intent of the Legislature that all districts - and therefore all students - be held harmless. A new funding formula should not negatively impact schools and students nor compound the challenges of the existing inadequate level of funding. While we recognize that much of the work of this Commission is highly technical, we urge you to look beyond the numbers.

Those numbers represent the wonderfully diverse children of Nevada, who only have a finite time in our education system. The decisions you make will impact the resources and opportunities they receive. As decisions are made regarding weighted funding, definitions, and allocations, please recognize how that funding will impact the lives of children in need of better resources so that they can realize their full potential.

The Pupil-Centered Funding Formula should be just that, centered on the needs of students. This requires funding the real costs associated with providing a quality education to all children. Weights should be tied not to current insufficient funding levels, but rather to what is necessary to meet the educational needs of children. Nevada cannot just aspire to adequacy.

Thank you for your consideration and efforts to develop and implement a new formula.

Rebecca Garcia
President
Nevada PTA

Item A4, Lola Brooks

Good morning members of the Commission. My name is Lola Brooks, and I serve as the President of the Board of School Trustees for the Clark County School District.

I appreciate the work and considerations the Commissioners have dedicated to working out the logistics for the state's new education funding formula. Shifting to a formula focused on the needs of students versus allocating limited resources based on past expenses is an integral step in moving education forward in the State of Nevada.

This new funding formula is a pivotal step in ensuring that the needs of all students are met, even as demographics shift over time. We appreciate all the work the Commission has put into adjusting the initial weights, which will reshape how the state approaches education funding.

We also feel the simplicity of the new funding formula will help Districts and schools provide the transparency the public desires and deserves by clearly illustrating the resources dedicated to educating each student.

Parents and community members will finally be able to see how much money each student, in every county across the state, receives, which will provide for a more equitable distribution moving forward. Hopefully, such transparency will discourage the long-standing practice of supplanting education funding instead of adding new funding sources as promised to voters over the years.

This work demonstrates great progress, but it's important to recognize that Clark County has the largest class sizes in the nation. A reduction in staffing has led to unmanageable workloads and consistent salary freezes over the past decade have taken a toll on staff morale. Before this Commission changes the hold harmless provision from the original intent of the legislature, there should be a strong consideration to ensuring that CCSD is made whole again in order for this new funding formula to be truly equitable.

I ask this Commission, just as Dr. Jara did, to maintain the hold harmless provisions moving forward. I understand that you must take into account the needs of every district in the state. As we look to build a funding formula that is equitable for every student, please remember the students in Clark County have been underfunded for decades and they represent a majority of the students in the state.

Thank you for your time and consideration.

A5, Superintendent Jesus Jara

Good morning members of the Commission. My name is Dr. Jesus Jara, and I am the Superintendent of the Clark County School District.

I want to thank the Commission for allowing me today to provide feedback about how we overhaul the current 50+ year old school funding formula particularly in regards to the hold harmless provisions

I want to add that I am sympathetic to districts that do not have the benefit of economies of scale and face their own unique challenges. However, the new funding formula clearly shows the students in Clark County have a greater need than is currently being funded.

As we look at our data, our children have been under resourced for decades, and our educators have been struggling to provide quality education for all students due to the lack of funding.

As we sit here today, 70% of our state's students reside in Clark County. Let me be clear, under the current funding formula, nearly every school district in our state has very real, very immediate challenges. Adequacy does not distinguish between large and small or rural and urban districts. The order of magnitude may be larger in the Clark County School District, but the plight facing our students statewide is remarkably similar. However, given the greater need identified in multiple funding analyses and new formula, we cannot ignore the need to provide more services to these students.

Few realize that I am also the Superintendent of the fourth largest rural school district in Nevada. In fact, over 7,000 CCSD students attend rural schools. I realize we will not benefit from the small district equity adjustment; however, the construct of the small school adjustment, as well as the comparative wage index factors, are also particularly important to ensuring we can serve every student, in every school.

Our State Legislature, when they crafted this bill, outlined an implementation plan to hold harmless districts that might lose funding for several years, and this commission has been hard at work on those details. We must maintain this original language, because if we provide inflationary increases to every district in the state this will negatively impact CCSD's chance to ever see true equity.

While this should be a plan that works for all kids across the state, it should not be a plan that continues to negatively impact a district that has been hurt by the Nevada Plan for decades. Nobody can deny that students in CCSD have been proportionally under-funded for decades.

It's important that the new funding formula address the needs of our kids and not be based on expenses from the prior year like in the Nevada Plan.

Our students, employees and community have struggled for far too long under a funding formula that doesn't serve our needs today.

This new funding formula lays the groundwork for us to work together as a state to transform public education. As the superintendent representing nearly 320,000 students in Southern Nevada -- students who deserve our absolute best -- once again I want to say thank you.

A6, Lindsey Dalley

CCSD rural schools need recognition that they exist within the CCSD urban district. This would go a long way to have a formal recognition that remote, rural, and small schools do exist inside of the urban CCSD district. There are two main reasons.

- Equity funding reasons like every other rural District in Nevada.
 - While this committee's jurisdiction may not be able to extend funding past a district down to rural, remote, and small schools within the urban CCSD, identifying and recognizing this situation exist would help those communities to bring this message to the legislature for corrective action.
- Grant application reasons.
 - Because Clark County demographics show high population density our remote and rural schools miss out on grant funding opportunities for Native Americans and other At-Risk student populations, including Special Needs.
 - Many outside funding resources are closed to us because of this.