



**Washoe County School District**

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## Washoe County School District Testimony for Regulation Hearing R108-15

**Section 6.** Repeated testimony in legislative hearings and the State Board of Education meeting has referenced “chronically” underperforming schools being selected, but the regulations only mention a singular year of data being used. “Most Recent Year”. We suggest this is changed to multiple years and multiple measures or perhaps the “three consecutive most recent years”. And given the difficulty in our testing data, is this even possible? It doesn’t say the most recent “available” year so what data will be used for the initial selection and would using the most recent data available be a violation of the regulation? It has been stated publicly that district efforts to improve turnaround schools like the Acceleration Zone in Washoe County will be taken into consideration in the selection of schools, but there is no mention of it in the regulations. We request the addition of language that would acknowledge district efforts and take them into consideration when selecting schools.

**Section 7.** At no point was this discussed or vetted during AB448. Either the schools are selected or they aren’t. There doesn’t seem to be explicitly authority for this section in AB448? It sounds like schools can negotiate their way out of the ASD by agreeing to another state led plan? This was not discussed during AB448 or at any other time. We request this section be deleted.

**Section 9.** We recommend language to address how the ASD will consult with districts as required by Section 20, subsection 3c of AB448.

**Section 9, subsection 3** should include notifying the board of trustees or the district of the schools selected either instead of or in addition to the schools. Since the schools are currently district school, the district would like the opportunity to be part of notifying the schools about this designation in order to manage the questions and concerns of district staff.

**Section 10, Subsection 4.** Request the Executive Director SHALL obtain assistance from independent reviewers.

**Section 11, Subsection 3.** Define in the best interest of the students in the state? We suggest adding language to ensure the expansion would serve children from other low performing schools?

**Section 14.** To be consistent with our policy to add language that says \$15,000 AND has a useful life of at least one year.

**Section 16, subsection 2.** We suggest language to allow for annual reviews by the Executive Director to ensure proper transparency of the progress being made. – covered in section 17.

**Section 17, subsection 1.** We suggest a definition of performance review and who is engaged in this process. And then what happens if the contract is terminated? Should that process be outlined in the regulations?

The Washoe County School District also respectfully requests language be added to this regulation to address:

- The explicit requirement that ASD schools must address the needs of ALL students currently at the school including special education, English language learners, students in poverty, gifted students, high disciplinary need students and all students regardless of their necessary level of support.

- The prohibition of any exclusion or removal process for a CMO that may exclude students from attendance of the ASD school.
- The process by which a CMO and the district enter into any requested and or necessary fee-for-services for items like nutrition services, transportation, special education, and any other services.