Educational and Operational Efficiency Study Final Report

Prepared for:

Clark County School District

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Executive Summary

This is a final report of an Educational and Operational Efficiency Assessment Study conducted by Gibson Consulting Group (Gibson) for the Clark County School District (CCSD). Gibson is a management consulting and research firm exclusively dedicated to the education industry for the past 20 years.

The study was initiated by Superintendent Jhone Ebert, authorized by the Board of School Trustees, and competitively bid in the Fall of 2025. The objectives of this study were to:

- **Improve student outcomes** through more effective use of existing resources, including targeted support for underperforming schools within current policy and funding constraints.
- **Assess how well financial and staffing resources align with district priorities**, using peer district benchmarks and key operational ratios to identify improvement opportunities.
- **Evaluate how people, time, and money are organized and managed** to determine where operations can be made more efficient, effective, and timely.
- **Strengthen budget strategy, transparency, and return on investment**, including programs to expand, redesign, or discontinue to better support student achievement.

This project consisted of two phases. The purpose of the first phase was to identify 10-12 of the most impactful opportunities that would significantly improve student achievement and/or achieve significant, annually recurring General Fund cost savings. The second phase focused on converting these opportunities to specific recommendations, working with the administration on implementation planning, solidifying fiscal impacts, and developing a monitoring framework to ensure their success.

The study began in January 2026 and was conducted over a five-month period. The approach included the examination of instructional systems, operational functions, financial practices, and decision authority across the district. The consulting team conducted a comprehensive review and analysis of district-provided data and documentation, benchmarked CCSD data against peer districts, conducted 28 school visits and 220 classroom observations, and interviewed 160 district and department leadership, staff, and external stakeholders.

Five peer districts were selected by Gibson with input from CCSD leadership for comparisons of educational and operational outcomes. Selection criteria included student enrollment, student achievement, and student demographics, among other factors. The peer districts are Los Angeles Unified School District (LAUSD; CA); Broward County Public Schools (BCPS; FL); Houston Independent School District (HISD; TX); Dallas Independent School District (DISD; TX); and Charlotte-Mecklenburg Schools (CMS; NC).

Gibson's team of 30 consultants and researchers included several alliance partners who brought specific education or technical expertise to this project.

- TNTP – a nationally-recognized leader in educational transformation, conducted an assessment of CCSD's Tier I instruction.

- Prismatic Services, Inc. (Prismatic) – a management consulting firm that has provided operational and support assessments for school districts over the past 20 years, focused on the identification of cost savings in facilities management, transportation, food services, and certain aspects of technology.
- SPED Direct Education Consultants, LLC (Dr. Jennifer Alexander) – a former state agency director over Special Education, provided technical leadership and support for the assessment of CCSD's Special Education programming and service delivery.
- National Multilingual Services (Dr. Myrna Rosado-Rasmussen) – a nationally recognized expert in the area of English Language Learner (ELL) instruction, provided technical leadership and support for the assessment of CCSD's ELL programming and service delivery.

On behalf of the entire project team, Gibson wishes to thank Felicia Gonzales, Deputy Superintendent of Business Operations, and Kristofer Huffman, Assistant Superintendent of Assessment, Accountability, Research, and School Improvement, for their partnership and support throughout this project. Both were instrumental in ensuring timely access to requested data and in supporting coordination across departments, which enabled this study to be completed within the five-month timeframe. Gibson also recognizes and appreciates the time and cooperation of CCSD district and department leadership and staff and the oversight provided by the Board of School Trustees.

Background and Context

CCSD has experienced significant legislative and economic changes over the past 11 years. In 2015, the Nevada legislature established a law requiring schools in a large district (of which CCSD was the only one) to become school "precincts," which transferred specific decision authority from the district level to schools. Principals and legislatively established School Organizational Teams (SOTs), consisting of local community members, were to have more say in decisions affecting schools. In 2019, Nevada's education funding methodology was transformed by the legislature from a decades-old, district-based funding approach (the Nevada Plan) to a student-based funding approach called the Pupil-Centered Funding Plan (PCFP). This plan, which was implemented over three years, also authorized additional weighted funding for students with additional needs.

Beginning in 2020, the COVID-19 pandemic had significant short-term educational, operational, and fiscal implications for school systems across the country, including CCSD. The nation's Elementary and Secondary School Emergency Relief (ESSER) Fund—established by the federal government through the 2020 CARES Act—provided significant relief to mitigate the fiscal impact of the pandemic on school systems for several years thereafter. Other economic impacts persist, however. Many school systems, including CCSD, experienced substantial declines in student enrollment after the COVID-19 pandemic, and continue to do so. The district's enrollment had already begun to flatten at 322,000 students in 2017-2018, but has since dropped to below 290,000 students and is projected to continue declining at a rate of 5,000 students per year over the next five years. State funding for education has increased since 2020, and CCSD invested most of those additional funds in higher pay for teachers and other positions.

Two important CCSD initiatives affecting operational efficiency were in process during this study. The district is in the final stages of selecting a new Enterprise Resource Planning (ERP) system to support its

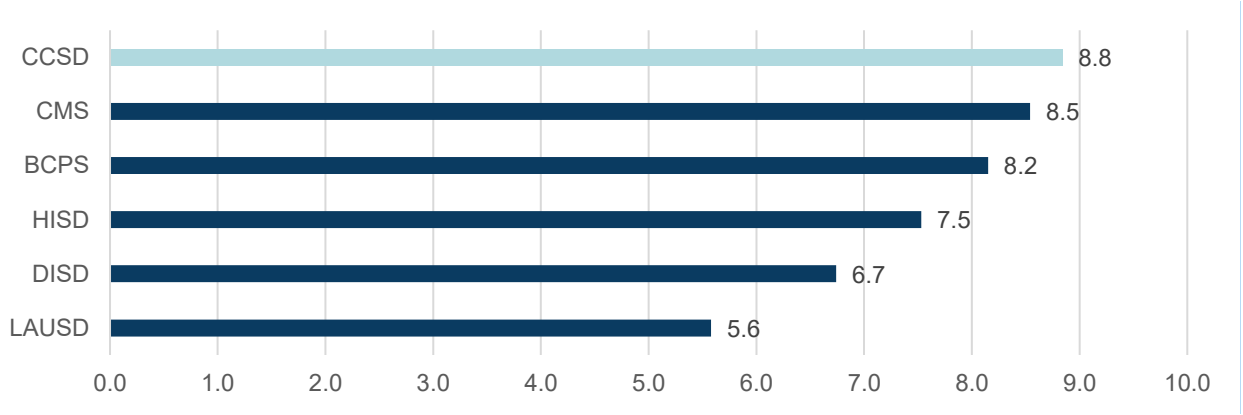
financial and human resource management functions. ERP systems represent the core sources of data for efficiency measurement. The district is also implementing a budget software tool to more efficiently support budget development, analysis, and presentation at the school and district levels.

Major Study Findings

Several important findings emerged from this study:

- CCSD is the most efficient district among the five peers in terms of staffing efficiency, measured as the ratio of total student enrollment to total staff full-time-equivalents (FTEs). This metric is one of the primary efficiency measures for school systems as staffing costs represents 80% or more of a district's total operating expenditures. The higher the ratio, the higher the staffing efficiency. CCSD's student-staff ratio of 8.84 exceeds all peer district levels and is 21% higher than the peer average of 7.31. Figure 1 compares CCSD's student-staff ratio to its peer districts for 2025-2026. Other factors could be contributing to variances, including state guidelines for class sizes, the number and capacity of schools, and the use of subcontractors instead of employees for certain operational functions, such as transportation or custodial services. While CCSD uses contracted services to support its operations, it does not currently outsource any major operational function (which would drive the ratio higher).

Figure 1. Student-Staff Ratio, CCSD and Peer Districts, 2025-2026



Note. CMS is Charlotte-Mecklenburg Schools. BCPS is Broward County Public Schools. HISD is Houston Independent School District. DISD is Dallas Independent School District. LAUSD is Los Angeles Unified School District.

Source. CCSD staffing and student enrollment data; State Department of Education website reports (all other peers)[1]

[1] The following are staff FTE sources by district:
Dallas ISD (DISD): Texas Education Agency (TEA), *PEIMS Standard Staff FTE Report*, 2025-2026, https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=adhoc.addispatch.sas&endyear=26&major=pe&minor=b&format=w&selsumm=id&linespg=60&charsln=120&grouping=%26grouping.&loop=2&key=057905&_debug=0;
Houston ISD (HISD): Texas Education Agency (TEA), *PEIMS Standard Staff FTE Report*, 2025-2026, https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=adhoc.addispatch.sas&endyear=26&major

- The consulting team validated the existence of a strong curriculum and high-quality instructional materials in use at CCSD. However, based on district administrator interviews, a review of curriculum guidance and observation tools, teacher focus groups, and a sample of classroom observations, the district has not clearly defined what strong instruction should look like in practice within each subject area. As a result, teachers and school leaders often interpret curriculum materials themselves as the instructional vision rather than as resources that support effective teaching and student learning. This lack of clarity contributes to variation in how the curriculum is implemented across classrooms. While many assignments include grade-level content, instructional practices often do not consistently support students in engaging deeply with that content.
- In comparison to its peers, CCSD is serving the lowest percentage of students with disabilities (SWD) in the general education environment at least 80% of the school day, and is 10 percentage points lower than the second lowest peer district. The consulting team identified many of the same issues with the district's special education program that were documented in the Council of Great City School's 2020 comprehensive program review. While the district has ongoing efforts that are designed to ensure high-quality programming across the continuum of services, the district should prioritize the scaling up of current initiatives and the allocation of resources into general education classrooms to support SWD.
- CCSD does not apply a Software Asset Management (SAM) program to better manage districtwide purchases and use of instructional and administrative software. Too many district-approved software application options are provided, and neither purchase nor usage data is tracked.
- There are industry best practices that could help the district's facilities management function be more efficient and reduce operating expenditures. Construction design standards should be upgraded to ensure buildings are designed to operate efficiently; "preventive" maintenance of facilities should be increased to reduce the current emphasis on the higher-cost "reactive" maintenance; and, energy benchmarking—the practice of measuring and comparing your building's energy consumption to similar buildings, past consumption, or target performance level—should be implemented to better monitor and reduce energy spending.
- CCSD's transportation routes are based on eligible student riders and not projected student riders, leading to less efficient service delivery. While routes are overbooked to partially compensate for

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Broward County Public Schools (BCPS): Florida Department of Education, *PK-12 Public School Data Publications and Reports – Staff Reports*. 2025-2026, https://www.fldoe.org/accountability/data-sys/edu-info-accountability-services/pk-12-public-school-data-pubs-reports/staff.stml;

Charlotte-Mecklenburg Schools (CMS): North Carolina Department of Public Instruction, Demographic and Finances, *The Statistical Profile – Public School Personnel*, Table A6, 2025-2026, https://apps.schools.nc.gov/public/f?p=145:109;

Los Angeles Unified School District (LAUSD): LAUSD Open Data Dashboard, *Finance*, 2025-2026, https://serviceapps.lausd.net/opendata/dashboard?share_id=Xa2czHsasMOMqW1G.

this, savings opportunities exist without disrupting service to students. The district's bus fleet composition is also contributing to a less efficient transportation system.

- The district's current budget process does not incorporate efficiency measurement, and as a result, focuses more on incremental changes to the budget instead of the entire budget. Prior year adopted budget amounts are used to drive future spending, with adjustments up or down based primarily on projected enrollment and available funding. This report recommends the ongoing measurement of efficiency across all departments, functions, and programs; the use of these measures to drive efficient budgets; and the annual disclosure of the district's efficiency assessment and impact in the budget document provided to the Board of School Trustees.
- CCSD would benefit from a formally defined decision authority framework. This study identified several inconsistencies in how district-defined programs and services are delivered across the school system. District and school-based decision authority should be evaluated and defined, ensuring compliance with applicable laws, district regulations, and administrative guidelines, and ensuring that decision authority supports optimum service levels and operating efficiency. This study offers a framework for defining major educational and operational decision authority at CCSD.

Table 1 presents a listing of the 12 recommendations that are discussed in the remainder of this report. A few of these recommendations can be acted on quickly, and in some cases, district leadership is already acting on them. Most will take three to five years to achieve the educational and economic benefits of full implementation.

Table 1. Listing of Recommendations

No.	Chapter 2: Educational Recommendations	Page #
1	Strengthen the implementation of Tier I instruction in literacy and mathematics.	7
2	Restructure Special Education program architecture to ensure coherence, efficiency, and alignment.	18
3	Implement a Content-Based Language Instruction framework to narrow the achievement gap for English language learners.	26
4	Reduce reliance on Acceleration Academies and redirect resources to school-based programs and support for credit-deficient high school students.	31
	Chapter 3: Operational Recommendations	
5	Implement a centralized software asset management program.	38
6	Reduce unnecessary transportation routes and related costs.	48
7	Implement a structured facilities preventive maintenance program to reduce overall maintenance costs.	56
8	Update the Construction Design Manual to achieve enhanced operational cost savings.	62
9	Reduce energy consumption through performance benchmarking.	65
10	Maximize General Fund indirect cost recovery.	70
11	Incorporate efficiency measurement into the budget process.	75
12	Adopt a districtwide decision authority framework.	80

Source. Gibson Consulting Group

Upon full implementation of the recommendations, CCSD is expected to realize almost $80 million in annually recurring General Fund cost savings. Table 2 presents a five-year projection of estimated savings for each recommendation's identified savings opportunity. Details of these calculations are provided in the text of the report.

Table 2. Fiscal Impact Summary, 2026-2027 to 2030-2031

Component	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031
Improved Software/Licensing Monitoring	$700,000	$4,250,000	$11,250,000	$11,250,000	$11,250,000
Transportation Routing and Bus Fleet Reconfiguration	$9,000,000	$12,500,000	$18,000,000	$18,000,000	$18,000,000
Preventive Maintenance Program	$10,000,000	$20,000,000	$20,000,000	$20,000,000	$20,000,000
Updated Construction Standards	$4,000,000	$8,000,000	$10,000,000	$10,000,000	$10,000,000
Energy Performance Benchmarking	$7,400,000	$9,900,000	$11,900,000	$11,900,000	$11,900,000
General Fund Indirect Cost Recovery	$3,500,000	$8,500,000	$8,500,000	$8,500,000	$8,500,000
Total Fiscal Impact	**$34,600,000**	**$63,150,000**	**$79,650,000**	**$79,650,000**	**$79,650,000**

Source. Gibson Consulting Group

The remainder of this report is organized under two chapters: **Chapter 1: Educational Recommendations**, and **Chapter 2: Operational Recommendations**. A separate document contains the following four appendices showing selected educational and operational trend and peer analyses:

Appendix A: CCSD Educational Trends;

Appendix B: CCSD Educational Peer Comparisons;

Appendix C: CCSD Operational Trends; and

Appendix D: CCSD Operational Peer Comparisons.

Chapter 1: Educational Recommendations

1

Strengthen the implementation of Tier I instruction in literacy and mathematics.

Background and Context

Tier I instruction is defined as the high-quality, grade-level instruction provided to all students in a general education classroom; when Tier I instruction is strong and well aligned, it meets the needs of most students. Tier I instruction is a component of a Multi-Tiered System of Supports (MTSS) framework in which Tier II instruction provides extra help for students who are mostly on track but need targeted support in a specific area. Tier III provides more intensive, individualized instruction for students with significant, ongoing learning needs.

The CCSD Curriculum and Instruction Division supports the development of curriculum guidance and the identification and selection of Tier I instructional materials. Instructional materials are adopted at the state level and selected by districts, while CCSD's work includes selecting materials and developing aligned guidance, professional learning, and supports for implementation. Since the Nevada Department of Education (NDE) may update content standards on different timelines, the district's adoption cycles for different content areas (e.g., Reading, English Language Arts [ELA], Math, Science) typically do not occur at the same time.

After more than 25 years without systemwide Tier I instructional materials, CCSD began implementing its current generation of standards-aligned, Tier I high-quality instructional materials for mathematics in 2021-2022, science in 2022-2023, and ELA, social studies, and world languages in 2023-2024. District leadership initially focused on making a significant investment in these resources and supporting their introduction across schools. As part of this study, CCSD requested the consulting team to assess the implementation of Tier I instructional materials and related curriculum guidance in mathematics and literacy, including how consistently these materials and supports are being used across a sample of schools. The consulting team conducted 115 observations across 12 schools, which included 57 literacy classes and 58 mathematics classes.

Assessment

The assessment below presents findings from a sample of classroom observations, stakeholder interviews, teacher focus groups, and document reviews to identify the primary factors affecting the consistency and effectiveness of Tier I instruction across the district.

Instructional Expectations

The consulting team validated the existence of a strong curriculum and high-quality instructional materials in use at CCSD. Classroom observations and stakeholder interviews suggest that there is variation across the district in how educators understand and apply what strong instruction should look like in practice within

each subject area. While CCSD has established an instructional vision through the Teaching and Learning Cycle and related instructional frameworks, the findings suggest that this vision has not yet been fully operationalized in classroom practices across schools, roles, and content areas. In the absence of a consistently operationalized implementation roadmap, some teachers and school leaders may default to treating curriculum materials as the instructional vision itself, rather than as resources that support effective teaching and student learning. This implementation gap contributes to variation in how instructional expectations, materials, and supports are enacted across classrooms. While many assignments include grade-level content, instructional practices often do not consistently support students in engaging deeply with that content. Several observations were made during our work:

- The challenge in many classrooms lies not in the presence of grade-level work but in how lessons are implemented and how students engage with the material.
  - 67% of reviewed assignments employed grade-appropriate content, while only 39% of lessons demonstrated strong instruction.
  - Instruction was based on district-selected instructional materials in 76% of observed lessons (literacy: 72%; mathematics: 81%).
- Feedback from teachers, school leaders, and district leaders points to a need for clearer, more consistent district expectations for instruction.
  - Some teachers shared that they perceive district guidance as unclear, inconsistent, or difficult to navigate, particularly when expectations are communicated through multiple roles, structures, and professional learning channels. CCSD has developed intentional communication pathways through the Teaching and Learning Cycle, region structures, central office leadership, and school leaders. However, transitions in leadership roles across the district and schools, along with variation in local implementation, appear to have affected how consistently those expectations reached classroom practice.
  - The Instructional Frameworks provide a research-based blueprint for curriculum use, instructional time, methods of delivery, high-quality instructional materials, and high-leverage practices. However, classroom observations and interviews suggest an opportunity to more consistently translate these frameworks into observable classroom practice, including what students should be doing, saying, and producing during strong instruction.
  - Principals and region leaders described a need for the district to set and communicate clear, consistent expectations for teaching and learning, and a desire for this study to support broad but practical expectations for instruction, materials use, pacing, and assessment.
- Instructional practices observed often place most of the cognitive work on the teacher rather than on students.
  - 14% of observed literacy lessons showed students responsible for the primary thinking of the lesson.
  - 33% of observed mathematics lessons showed students engaging in key mathematical practices.

School leaders emphasized the importance of classrooms where students are engaged in rigorous work, use academic language and discourse, and demonstrate visible ownership of their learning. Several school leaders also expressed concern that recent shifts in district leadership and priorities have reduced coherence and weakened the district's focus on instruction. Establishing a clear, succinct, content-specific definition of strong instruction in reading and mathematics would create shared expectations across the district about what students should be doing during lessons and how teachers should support that learning. Such a vision should articulate a small number of high-impact instructional practices for each content area, aligned to Nevada's Educator Performance Framework (NEPF) and CCSD's existing instructional frameworks for effective teaching and learning, including:

- Explicit, systematic foundational skills instruction aligned to the Science of Reading, ensuring students receive structured teaching in phonological awareness, phonics, fluency, vocabulary, and comprehension;
- Text-based discussion and knowledge building in literacy, where students regularly read, analyze, and discuss complex texts to build knowledge and strengthen comprehension; and
- Conceptual understanding and mathematical reasoning in mathematics, where students explain their thinking, engage in problem solving, and make connections between mathematical ideas rather than focusing primarily on procedures.

School leader interviews also suggest—and the consulting team concurs—that this vision should remain tightly focused on literacy and numeracy, as students cannot fully benefit from choice, innovation, or expanded programming if they do not first have basic literacy and numeracy skills.

Instructional Observations and Feedback

CCSD uses multiple tools for classroom observations, including the NEPF, the Tier I Monitoring Tool, and the Professional Learning Community (PLC)-related tools and templates. These tools provide important structures for observing classrooms, evaluating instruction, and supporting professional learning. The recommendation is not necessarily to replace the tools, but to strengthen how they are implemented, calibrated, and connected to a small set of content-specific instructional commitments that can guide day-to-day observation and feedback.

The NEPF provides a comprehensive framework for evaluating teaching and includes high-leverage instructional standards. CCSD's content instructional frameworks and professional learning structures further connect NEPF expectations to content-specific approaches and strategies. However, interviews and observations suggest an opportunity to make these connections more explicit and consistently applied during classroom observation, feedback, coaching, and support cycles.

Similarly, the district's Tier I Monitoring Tool emphasizes alignment to standards, use of instructional materials, and the presence of instructional components such as learning intentions and success criteria. While these elements are important, stakeholder feedback and observation data suggest an opportunity to strengthen the use of the tool so that it more consistently supports analysis of instructional quality, student thinking, and engagement with rigorous, grade-level work. For example, indicators such as whether learning intentions are posted or whether students are "engaged" do not clearly define what it looks like for students to do the thinking required by the standard.

Across these tools and implementation routines, there is an opportunity to move from documenting the presence of required components toward using observation and feedback as a shared learning process focused on instructional quality, content-specific practice, and student experience. Currently, school leaders lack a simple, shared tool for identifying:

- Whether students are doing the cognitive work of the lesson;
- Whether instruction reflects strong, content-specific practices; and
- Whether scaffolds maintain rigor while supporting access.[2]

Although teacher experiences vary across schools, the perceptions of teacher focus group participants indicated a need for more practical instructional feedback and modeling. Several teachers described wanting more frequent classroom-based support, clearer modeling, and feedback that helps them understand what strong implementation looks like in practice.

School leaders expressed interest in an observation process that looks at what the student is doing, whether the task is rigorous and aligned to grade-level expectations, what scaffolds have been provided, and whether those scaffolds are being released appropriately.

Observation data collected by the consulting team revealed a large gap between grade-level content and strong instructional practice. The following observations were made by the consulting team:

- Most lessons were focused on grade-level content. Reading foundational skills and mathematics had the highest rates of aligned content, with 92% of lessons focused on grade-level material.
- 39% of lessons observed demonstrated strong instruction. Students were responsible for the primary thinking of the lesson in 14% of literacy observations, and 33% of mathematics observations.
- Middle school mathematics instruction was primarily teacher directed, with teachers providing frequent corrections, owning the cognitive lift, and minimizing opportunities for students to independently reason and solve problems.
- Multiple school leaders stated that they want classroom observations to more consistently examine whether students are being asked to do the work of the standard, whether the task is fully aligned to grade-level expectations, and whether classrooms are engaging places where students want to participate and think. This work should build from, and more tightly align implementation of, the NEPF, the Tier I Monitoring Tool, and CCSD's instructional frameworks.

School leaders point to the district's appetite for a more practical observation approach that would reveal whether:

- The task matched the intent of the standard;
- Students were doing rigorous, grade-level work;

[2] In education, scaffolding is a structured approach to instruction in which teachers provide guided support, modeling, and prompts that are progressively reduced as students become more independent learners.

- Students were using academic language and discourse;
- Scaffolds were appropriate and not excessive;
- Students were truly engaged in the task; and
- Materials were being used to support instruction aligned to the standard.

Professional Learning for Instructional Improvement

Observation data suggests varying connections between content knowledge and instructional practice. For example, reading foundational skills instruction was the strongest area observed, with 59% of lessons demonstrating effective teacher-directed instruction. (Nevada made a statewide investment in Language Essentials for Teachers of Reading and Spelling [LETRS] training, which has helped build teacher knowledge of the Science of Reading and how foundational skills should be taught.) This suggests that, when teachers receive deep, content-specific learning, instructional practices improve. Comparatively, 46% of mathematics lessons and 33% of reading and literacy comprehension lessons demonstrated effective teacher-directed instruction.

Some teachers reported that professional learning experiences, particularly those connected to new materials or vendor-led sessions, focused more on program orientation than on the instructional practice needed to implement lessons effectively.

- Teachers frequently described vendor-led training as focused on introducing materials, platforms, or program components, while expressing the need for additional support focused on lesson implementation, student thinking, scaffolding, pacing, and maintaining grade-level rigor.
- Teachers reported needing stronger support to adapt lessons for students performing below grade level, manage pacing constraints, and maintain grade-level rigor while supporting diverse learners.
- District leader interviews also suggest a system-level capacity issue. For example, district leaders noted that support staffing is thin relative to the size of the district, including having one ELA implementation manager for 70 elementary schools, which makes it difficult to provide regular coaching at the scale needed.

CCSD has established multiple professional learning structures, including series-based and cohort-based opportunities. However, findings suggest an opportunity to better align these structures around a small set of instructional priorities and to more consistently connect professional learning to classroom implementation, coaching, and feedback. District leader interviews described:

- A recent centralized Leadership and Professional Learning Division created to drive instructional coherence by aligning employee pipeline supports around a unified vision of evidence-based practice for new teachers, new teacher leaders, new administrators, and new principals;
- A comprehensive two-year New Teacher Pathway (with the first year focused on classroom management and relationships) that integrates foundational classroom culture, positive student-teacher relationships, and high-leverage instructional practices; and

- Principal Pipeline development, grounded in the NEPF standards, that develops instructional leadership skills, behaviors, and competencies for new and novice school leaders.

At the same time, district leaders acknowledged challenges in communication and coherence across divisions, a disconnect between some professional learning initiatives and core instructional improvement work, and a desire to "refocus on instruction" after a year that felt heavily operational.

These findings suggest the district already has important ingredients in place, but they are not yet sufficiently aligned around a clear instructional vision and content-specific adult learning strategy. Comparing existing professional learning to the district's highest-priority instructional practices could help CCSD identify where current sessions already support research-based pedagogy, where gaps remain in delivery or implementation, and how professional learning can more consistently translate into classroom practice. This would also help clarify that the curriculum is the resource that supports strong content-specific instruction, not the instructional vision itself.

Instructional Coherence

Teachers across CCSD reported navigating a large number of instructional resources, disconnected training opportunities, and guidance materials from the district. While many of these resources are purposeful and embedded in content-specific professional learning, the findings suggest an opportunity to further clarify how educators should prioritize and use them in daily practice. Administrators described the district as taking on too much at once, resulting in an approach that reduces the quality of support provided to schools. District leaders also described "parallel programs working on the same thing," limited central support, and a need to better combine overlapping efforts, streamline resource use, and improve the district's academic return on investment (ROI).

Teachers reported navigating a large volume of district guidance and resources, and frequently described district guidance as overwhelming and difficult to navigate.

- The Curriculum Hub is designed as a one-stop shop for curricular resources and professional learning opportunities, with resources organized by grade band, grade level, content area, and course. At the same time, teacher feedback suggests that some educators still experience the volume of available resources and guidance as difficult to navigate, which points to an opportunity to further clarify which resources are most essential for daily planning, instruction, and PLC use.
- School and district leaders called for better resource management, stronger cohesion across divisions, fewer initiatives, and more focused expectations for instruction, materials usage, pacing, and assessment.

Some teachers frequently rely on colleagues rather than district guidance. Teacher focus groups revealed strong school-level peer collaboration. While this collaboration is a major strength, reliance on informal support structures can lead to significant variation in instructional practices across schools. School and district leader interviews similarly described uneven coherence across the district, missed opportunities for proactive support when regions and departments are not included early in planning, and a need for clearer role alignment and collaboration across the organization. Resource overload can contribute to

fragmentation in district support. District leader interviews described the need to “work smarter, not harder,” reduce silos, and reallocate resources toward efforts with stronger instructional ROI.

While this recommendation seeks to simplify communication, it is also about improving the coherence, efficiency, and impact of district support. Reducing the number of resources and clearly prioritizing a smaller set of instructional practices and tools could help teachers focus their time and energy on improving student outcomes.

Supporting Students with Unfinished Learning

Teachers across CCSD consistently reported that many students enter classrooms several grade levels behind in reading and mathematics. CCSD has existing structures intended to support students with unfinished learning, including acceleration blocks and Reading Skills Centers designed to address literacy skill gaps. The scope of this study did not include a comprehensive review of all acceleration block instruction or Reading Skills Center implementation. Accordingly, this section focuses primarily on what was observed and reported regarding Tier I classroom instruction. While the district has selected high-quality instructional materials aligned to grade-level standards, teachers often struggle to implement these materials when students lack the prerequisite knowledge and skills required to access the content. In response, teachers frequently modify lessons, simplify assignments, or introduce supplemental materials to make instruction more accessible. While these adaptations are intended to support struggling learners, they often reduce the rigor of the lesson or shift instruction away from grade-level expectations. School leader interviews reinforce this challenge. Several school leaders emphasized that one of the biggest instructional issues is over-scaffolding, providing so much support that students are no longer doing the cognitive work of the standard. They also expressed concern about whether scaffolds are being released appropriately and whether students are engaging in rigorous, grade-level tasks.

Teacher focus groups highlighted widespread concern about student readiness and the challenges teachers face when implementing grade-level curricula. Teachers frequently described classrooms that include students with a wide range of learning needs, making it difficult to determine how to implement grade-level lessons while supporting all students.

Teachers also reported needing more practical support for addressing these gaps while maintaining rigor, including clearer guidance on how Tier I instruction, acceleration blocks, Reading Skills Centers, and intervention supports should connect to one another. This was reinforced by the consulting team’s classroom observations. Student progress was monitored and instruction was adjusted in 17% of foundational skills lesson observations. Teachers frequently described needing more guidance on how to support struggling learners while continuing to teach grade-level content. Teachers cited needing more support in:

- Scaffolding grade-level curricula for students performing below grade level;
- Identifying strategies to accelerate learning without lowering expectations; and
- Adapting lessons while maintaining alignment to standards.

District leaders identified over-scaffolding and unfinished learning as central barriers to strong Tier I instruction. District leader interviews described the following concerns and needs:

- A concern that students are being supported in ways that avoid rigorous work rather than being supported to engage in it;
- A need to examine whether tasks remain fully aligned to the intent of the standard;
- A need for clearer expectations for scaffolding and release; and
- A desire for practical guidance that can be differentiated for lower-performing schools without abandoning grade-level goals.

School leaders also repeatedly emphasized that literacy and numeracy must remain the core focus, noting that long-term student success depends on ensuring students have consistent, early access to strong instruction in both areas. Providing clearer guidance and professional learning on supporting students with unfinished learning while maintaining access to grade-level content would help teachers balance rigor and accessibility in daily instruction.

Assessment Summary

CCSD has made significant investments in high-quality instructional materials, observation tools, and professional learning structures. However, findings from this study indicate that fragmented priorities, unclear ownership, and inconsistent implementation have limited the impact of these efforts. As a result, schools experience multiple initiatives without clear alignment, contributing to incoherence, initiative fatigue, and variability in instructional quality.[3]

At the classroom level, this variability is reflected in inconsistent student experiences. While grade-level content is often present, instructional practices do not consistently support students in engaging deeply with that content. This points to a need not for new resources, but for greater coherence, clarity, and support in how existing tools and strategies are implemented. Improving Tier I instruction districtwide will require moving beyond alignment on paper to alignment in practice—where strategy, structures, and day-to-day behaviors reinforce one another.

Implementation Strategies

Establish and communicate CCSD's commitments for strong Tier I instruction in literacy and mathematics.

- **Define clear, content-specific instructional commitments grounded in CCSD observation data.** These commitments should consist of five to seven high-impact, content-specific expectations that define strong instruction in CCSD classrooms. Possible examples include students: doing the cognitive work of the lesson; including an explanation of their thinking; making connections; and, solving problems aligned to the standard. Teacher tasks and questions should reflect the full intent and rigor of the grade-level standard, requiring students to make meaning of the content rather than complete procedures. Instruction should also support access to grade-level

[3] In this context, "incoherence" means a lack of alignment, connection, and consistency across the different parts of a student's instructional experience, especially across core instruction, interventions, and supports.

work while maintaining rigor, with scaffolds that enable student thinking and that are gradually released.

- **Translate the instructional commitments into clear, observable practice**. CCSD should develop and provide guidance that helps school leaders and teachers identify what each expectation *does* and *does not* look like in practice. This guidance should provide clarity on what students should be doing during lessons, not just what teachers are doing. Guidance documents should align expectations across grade bands and content areas to reduce variability in interpretation.
- **Align district tools, guidance, and professional learning to the instructional commitments**. The district should review and revise existing frameworks, observation tools, and curriculum guidance to eliminate conflicting or unclear expectations. This will ensure that all district materials reinforce the same definition of strong, content-specific instruction. The district should also anchor curriculum use, coaching, and professional learning in the instructional commitments.
- **Launch the instructional commitments through a structured, systemwide implementation.** A sequenced implementation plan should be developed for district leaders, school leaders, and teachers. This plan should include training focused on understanding the expectations, identifying evidence of student thinking, and connecting the curriculum to strong instructional practice. Expectations should be reinforced through ongoing communication and coaching.

Implement a content-specific observation and feedback model aligned to CCSD's instructional commitments.

- **Align observation practices to the district's instructional commitments for Tier I instruction**. CCSD has existing observation tools and frameworks, including the NEPF and Tier I Monitoring Tool. The opportunity is to strengthen consistent implementation, calibration, and shared interpretation of what strong instruction looks like across schools. The district should ensure that observation tools and protocols are tightly aligned to the instructional commitments, with a focus on whether students are doing the cognitive work of the lesson, whether tasks reflect grade-level rigor, and whether instruction supports meaningful student engagement with content.
- **Establish a clear, repeatable observation and feedback coaching cycle.** This work begins by defining expectations for frequent, focused classroom observations followed by timely, actionable feedback. The coaching cycle should ensure that school leaders consistently capture objective evidence of student and teacher actions, identify the highest-leverage instructional gap, and provide clear, actionable next steps for improvement. This will shift classroom observation and feedback from a compliance focus toward improving instructional practice and student outcomes.
- **Build school leader capacity to accurately observe and respond to instruction.** The district should provide support for school leaders and coaches to distinguish between strong and developing instruction, analyze the quality of tasks and student thinking, deliver feedback that leads to changes in teacher practice, and ensure school leaders have ongoing opportunities to practice and refine these skills over time.
- **Establish calibration routines to ensure consistency across schools.** The district should create regular opportunities for school leaders to observe and discuss instruction together and build

a shared understanding of what strong instruction looks like in practice. Clear expectations and calibration across school leaders will allow the district to address variations in observation and feedback practices across schools.

- **Use observation data to monitor instructional trends and inform support.** To continuously improve the work, the district team should regularly analyze observation data to identify patterns in instructional practices across the district. The team should track trends in student thinking and engagement, alignment to grade-level standards, and instructional rigor. The results of this analysis should guide professional learning, coaching, and system-level decisions.

Build educator capacity to deliver strong Tier I instruction through content-specific, practice-based professional learning.

- **Prioritize content-specific instructional practices based on CCSD observation data.** Observation data showed that, while foundational skills instruction was relatively stronger, 39% of all observed lessons demonstrated strong instruction, with lower rates in literacy comprehension and mathematics. Students were responsible for the thinking in 14% of literacy lessons and 33% of observed mathematics lessons, indicating a need to strengthen practices that support student reasoning, discourse, and engagement with grade-level content. The district should identify a focused set of high-priority instructional practices aligned to the district's instructional vision to guide all professional learning efforts.
- **Build from existing professional learning and strengthen the connection to instructional practice.** The district should review current professional learning to identify where CCSD already provides content-specific, research-based support, where educators need more implementation support, and how professional learning can more consistently focus on how to teach, in addition to what materials to use. Professional learning should be redesigned to focus on how to teach, in addition to what materials to use. This will help ensure that learning experiences are grounded in the demands of grade-level standards, and that district-selected instructional materials are used and used correctly. Through professional learning experiences, teachers will be able to emphasize how to better support student thinking, maintain rigor, and use scaffolds effectively.
- **Provide job-embedded, practice-based professional learning aligned with daily instruction.** Professional learning should be structured to include lesson internalization and preparation focused on anticipating student thinking and planning key instructional moves, opportunities for rehearsal and practice of instructional strategies, and the analysis of student work and tasks to build understanding of rigor and alignment. By building on existing series-based, cohort-based, PLC, coaching, and school support cycle structures, school leaders can ensure learning is ongoing, connected to daily instruction, and reinforced through practice, feedback, and implementation support.
- **Differentiate professional learning and support based on role and need.** CCSD should provide targeted support for district and region leaders to monitor implementation and support coherence. School leaders should lead observation and feedback cycles to strengthen daily instructional practice. Observation data can identify variations in practice across schools and content areas, and accordingly support needed adjustments.

- **Align professional learning, coaching, and observation systems to reinforce the same instructional priorities.** CCSD should ensure that professional learning is directly connected to the instructional vision, as well as observation and feedback practices. Key instructional practices should be reinforced so that teachers receive consistent messaging. The impact of professional learning should be monitored through changes in instructional practice and the student experience.

Improve system coherence by narrowing priorities and aligning instructional resources and supports.

- **Conduct a comprehensive review of instructional initiatives, resources, and guidance.** Feedback from teachers, school leaders, and district leaders indicated that CCSD staff are navigating a large volume of resources, tools, and competing priorities, contributing to inconsistent implementation across schools. CCSD should conduct a districtwide audit to identify redundant or overlapping initiatives, misaligned or low-impact resources, and conflicting guidance across departments or divisions. This review should also assess the extent to which current resources align to the district's instructional vision and priorities.
- **Define and communicate a focused set of instructional priorities aligned to Tier I instruction.** Based on the findings of the review, CCSD should establish a small number of high-impact instructional priorities aligned with the district's instructional vision for literacy and mathematics. These priorities should clearly distinguish non-negotiables (e.g., core expectations for all classrooms) and flexible practices (e.g., areas where schools have discretion). The district should ensure that these priorities directly address observed gaps in instructional practice, including limited student thinking and inconsistent rigor.
- **Align and streamline district resources, tools, and professional learning to the defined priorities.** Through this process, CCSD should eliminate or consolidate low-impact or redundant resources. Guidance materials should be revised so that all supports reinforce the same instructional expectations and practices so that professional learning, coaching, and observation systems are aligned to the same priorities.
- **Reduce the burden on school leaders by simplifying expectations and providing aligned support.** School leaders should be provided with clear, prioritized guidance on instructional expectations and supports. The district should limit the introduction of new initiatives that are not aligned with the district's core priorities. This will enable school leaders to focus on instructional leadership, including observation, feedback, and teacher development.

Strengthen Tier I instruction to support students with unfinished learning while maintaining grade-level rigor.

- **Strengthen vertical alignment and progression of skills across grade levels and content areas**. In ELA, the district should use the progression of standards and foundational literacy skills to clarify prerequisite knowledge and supports. In mathematics, the district should use progression tools and coherence maps to help teachers understand how grade-level concepts build over time and how to support unfinished learning without lowering the cognitive demand of current grade-level work.

- **Establish clear expectations for maintaining grade-level rigor while supporting access.** Teacher and school leader feedback indicated that many students enter classrooms with significant skill gaps, and teachers often respond by modifying or simplifying grade-level tasks. Observation data suggests that scaffolds are not consistently supporting students into grade-level work and may instead reduce the cognitive demand of the task. The district should define clear expectations for Tier I instruction that emphasize maintaining alignment to the full intent of grade-level standards, supporting students in doing the cognitive work of the lesson, and using scaffolds to enable access without reducing rigor.
- **Provide guidance on effective scaffolding and support strategies within Tier I instruction.** CCSD should develop and communicate guidance that helps teachers anticipate common student misconceptions and challenges, use scaffolds that support student thinking (e.g., questioning, modeling, structured supports), and gradually release scaffolds to promote independence. This will help ensure guidance is aligned to content-specific instructional practices in literacy and mathematics.
- **Build teacher capacity to adapt instruction while maintaining alignment to grade-level standards.** The district should provide professional learning and coaching focused on planning lessons that maintain rigor while addressing diverse student needs, adjusting instruction in response to student understanding without lowering expectations, and supporting productive struggle and student ownership of learning. Professional learning and coaching should build teachers capacity to make decisions during instruction, including how to respond when students are not yet meeting expectations.
- **Align Tier I instruction, acceleration blocks, Reading Skills Centers, and intervention supports to ensure coherence.** The district should clarify how each support structure contributes to student access to grade-level content, ensuring interventions reinforce rather than replace Tier I instruction and connect to the same instructional priorities and practices. The district should ensure that supports across tiers are coordinated and do not send conflicting messages to teachers.
- **Monitor the effectiveness of supports for students with unfinished learning.** The district should use classroom observation and student performance data to assess whether students are consistently engaging in grade-level work, whether scaffolds are supporting or reducing rigor, whether patterns are identified across schools and student groups to inform targeted support, and whether guidance and supports are adjusted based on trends in student access and instructional practice.

2 Restructure Special Education program architecture to ensure coherence, efficiency, and alignment.

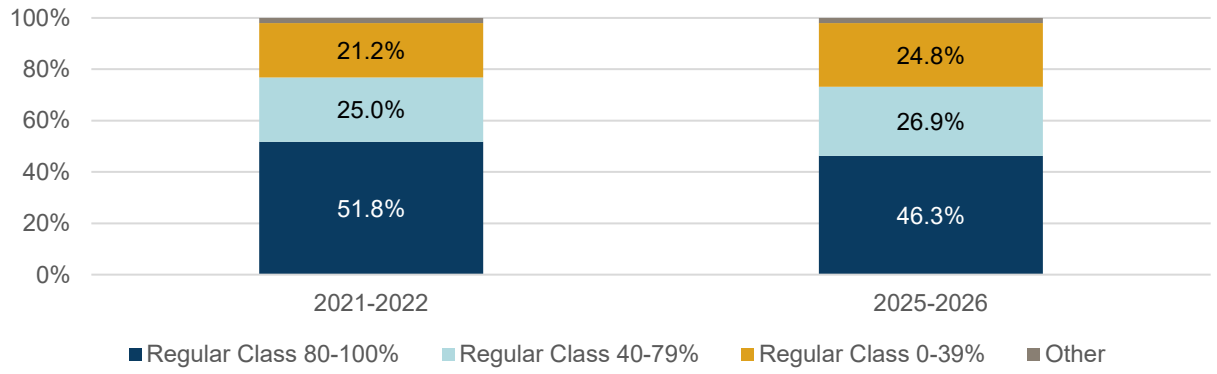
Background and Context

Placement decisions for students with Individualized Education Programs (IEPs) are determined by IEP teams in alignment with least restrictive environment (LRE) requirements of the Individuals with Disabilities Education Act (IDEA). LRE means that, to the maximum extent appropriate, children with disabilities are

educated with children who are not disabled, and that special classes, separate schooling, or other removals of children with disabilities from the regular educational environment occur only when the nature or severity of the disability is such that education in general education classes with the use of supplementary aids and services cannot be achieved satisfactorily.[4] Based on data analysis, the consulting team identified concerns with student placement and LRE practices, which are reinforced by and embedded within the district's current special education program structure.

In a 2020 Council of Great City Schools (CGCS) review of CCSD's Special Education Services, documented in a formal report presented to the Board of Trustees, the CGCS team identified that SWD in CCSD were educated in general education classes at rates well below the state's target rate and national averages. Since the release of that report, the percentage of SWD educated in general education classrooms has decreased. Based on student enrollment data, the percentage of school-aged SWD spending more than 80% of their school day in the general education setting has decreased from 51.8% in 2021-2022 to 46.3% in 2025-2026. Conversely, the number of school-aged students served in the most restrictive settings (i.e., spending less than 39% of their day in a general education setting) has increased from 21.2% in 2021-2022 to 24.8% in 2025-2026 (Figure 2).

Figure 2. Percentage of SWD Across Special Education Instructional Settings, 2021-2022 and 2025-2026



Note. The 'Other' category includes Correctional Facility, Homebound/Hospital, Parentally Placed in Private School, Residential Facility, and Separate School.

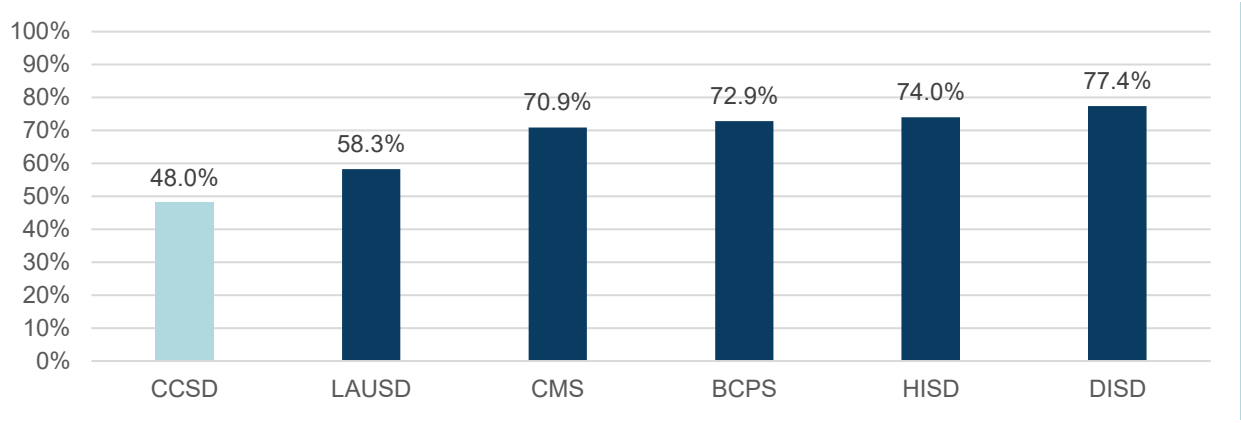
Source. CCSD student enrollment data

This trend spans the district's most common disability categories (autism, other health impairment, and specific learning disabilities), signaling a systemic move toward more restrictive placements.

In comparison to peer districts, CCSD is serving the lowest percentage of SWD in the general education environment at least 80% of the school day. CCSD is 10 percentage points lower than the second lowest peer district, LAUSD (Figure 3).

[4] 34 C.F.R. §300.114(a).i.

Figure 3. Indicator 5A Percentages, Peer District Comparison, 2023-2024



Source. Special Education Annual Performance Reports for school districts

Assessment

District support structures need improvement in order to ensure that schools are able to effectively serve SWD in general education settings. One of the contributing factors affecting the level of support available to SWD in general education settings is the district's current staffing practices. Based on Nevada regulations, special education teachers who teach primarily in a resource setting can carry a caseload of 24 students.[5] These guidelines present significant challenges at the elementary level, where most schools are staffed with one or two resource teachers. Under these conditions, delivering required service minutes across multiple grade levels and subject areas becomes logistically difficult without relying heavily on a resource/pull-out model. Without sufficient staffing, the staffing model—rather than student need or LRE—tends to dictate service delivery. Additionally, based on information learned during interviews and focus groups, the district has not articulated a clear vision or understanding of how to provide specially designed instruction to SWD in general education settings, including a delineation of roles and responsibilities for both general education and special education teachers in inclusive settings.

The district's current specialized programming options lack coherence in operation and consistency in implementation.[6] While the district's Special Education Procedures Manual defines and outlines program expectations for Special Education programming in the district, the consulting team observed misalignment between district procedures and program design and implementation. For example, during observations of the district's Social/Emotional Teaching and Reinforcement (STAR) program, the consulting team observed wide variations in the approach to behavior intervention and support. In some instances, the specific behavior program/support was not apparent.[7] Additionally, based on interviews, the district's Specialized Learning Disabled (SLD) programming is designed for students who are multiple grade levels behind.

[5] Nevada Administrative Code (NAC) 388.150(1)(a) and 388.150(4).

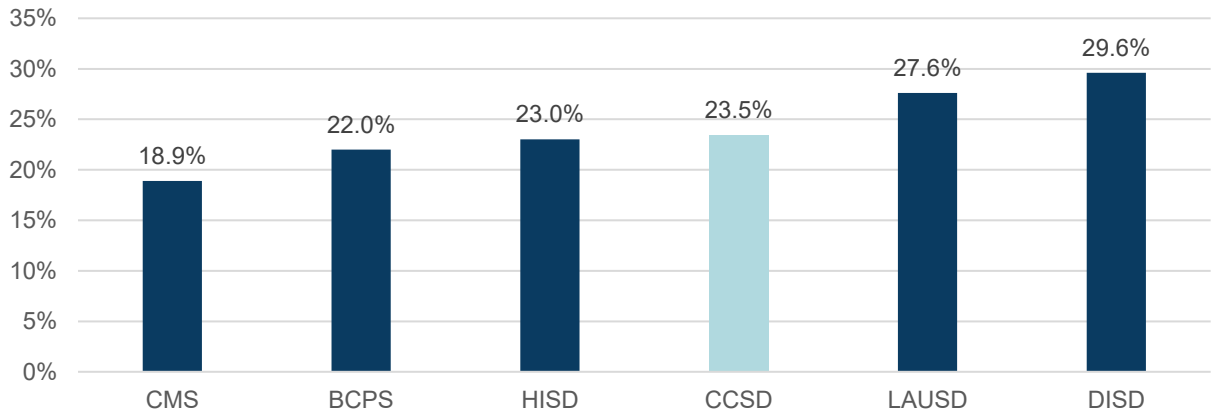
[6] The 2020 Council of the Great City Schools Review of Special Education Services report identified similar concerns related to the district's special education programming.

[7] The consulting team observed classrooms at four elementary schools, two middle schools, and two high schools. Together, over 45 different classrooms were observed, including nearly 20 resource programs, 10 autism programs, five Specialized Learning Disabled (SLD) programs, four STAR programs, three Functional Life Skills and Life Skills programs, two Special Day Class and KIDS programs, and one early childhood program and transition program.

However, the district has SLD programming for K-2 students, who are too young to meet this entry criteria.[8] During interviews, district staff also shared similar concerns related to the district's programming.

Among the district's specialized programs, autism programming demonstrates the greatest need for redesign and improved alignment to district expectations. Based on student enrollment data, from 2021-2022 to 2025-2026, the percentage of SWD increased by 54.3%, or 3,965 students. The increase in the number of students with autism contributed to 75.4% of the district's overall growth of SWD in the district. However, as shown in Figure 4, the percentage of SWD with autism in CCSD (in 2024-2025, the most recent peer data available) is comparable to the percentage of SWD with autism in peer districts.

Figure 4. Percentage of SWD with Autism, Peer Comparison, 2024-2025



Note. Data sources are from various states, which may result in variances in data collection. Results should be interpreted with caution.

Source. *Charlotte-Mecklenburg Schools:* North Carolina Public Schools Statistical Profile, Table 9 – Pupils in Membership Being Served https://apps.schools.nc.gov/apx212/f?p=145:14; *Broward County Public Schools*: Florida Department of Education, Student Enrollment Reports https://edudata.fldoe.org/AdvancedReports_Tableau.html?StudentEnrollments=true; *Houston Independent School District and Dallas Independent School District*: Texas Education Agency, Texas Academic Performance Reports, https://tea.texas.gov/texas-schools/accountability/academic-accountability/performance-reporting/texas-academic-performance-reports; *Clark County School District*: Nevada Department of Education, October 2024 Nevada IEP Child Count https://doe.nv.gov/offices/office-of-comprehensive-student-services/data-systems/counts-of-students-with-disabilities; *Los Angeles Unified School District:* California Department of Education, Special Education Downloadable Data Files, https://www.cde.ca.gov/ds/ad/filesspedps.asp

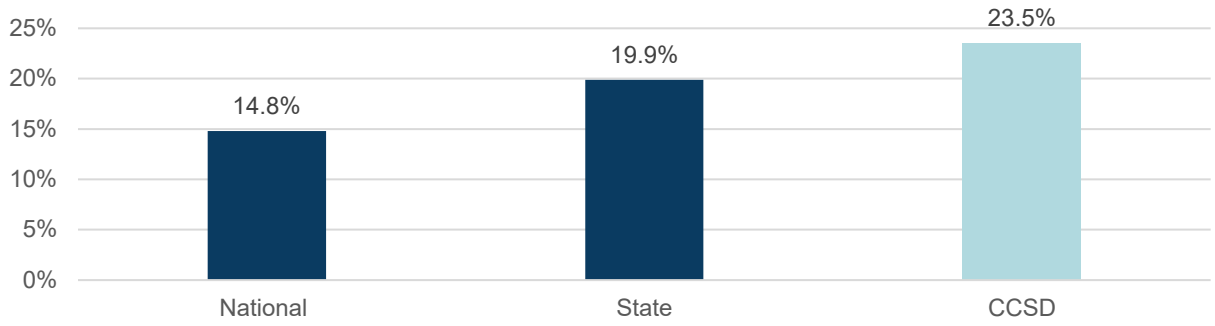
Variability in autism prevalence can be attributed to multiple factors, including differences in identification practices, and the availability of access to services within a community.[9] Because of this, large school districts, such as CCSD and other identified peers, may have higher identification rates and may exceed

[8] SWD can be placed into SLD programs after receiving special education services through the district's PreK and early intervention programming. Districts must offer a continuum of services, including more restrictive placement options, if students need those settings to receive a free and appropriate public education (FAPE).

[9] *Community Report on Autism 2025*. Autism and Developmental Disabilities Monitoring (ADDM) Network. https://www.cdc.gov/autism/media/pdfs/2025/04/ADDM-Community-Report-SY2022.pdf.

state and national identification rates. As shown in Figure 5, CCSD exceeds both state and national percentages for SWD with autism (see Figure 5).[10]

Figure 5. Percentage of SWD with Autism, State and National Comparison, 2024-2025



Note. Data sources are from various sources, which may result in variances in data collection.

Source. *National*: Advocacy Institute: Number of IDEA-eligible students increases 3% in 2024, tops 8 million https://www.advocacyinstitute.org/blog/; *State* and *Clark County School District*: Nevada Department of Education, October 2024 Nevada IEP Child Count https://doe.nv.gov/offices/office-of-comprehensive-student-services/data-systems/counts-of-students-with-disabilities

The majority of students with autism have limited access to general education opportunities. In 2025-2026, 57.9% of school-aged students with autism were in general education classes for less than 39% of their school day (an increase of 7.0 percentage points from 2021-2022). Less than one-quarter of school-aged students with autism (23.8%) spent more than 80% of their school day in general education classrooms.[11] In 2025-2026, the district spent $60 million on teacher base salaries for specialized autism programs across 800 autism classrooms in the district.[12] Based on interviews, the district is anticipating an increase in the number of autism classrooms for the 2026-2027 school year.

During 12 classroom observations of autism programming across the district, there were limited observable examples of components associated with best-practice instruction for students with autism. In particular, the use of low- and high-tech communication supports was not consistently evident, despite the presence of available technology. Visual schedules (although often present) were not referenced and did not appear to be frequently used, and there was limited evidence of Applied Behavior Analysis (ABA) or Discrete Trial Training (DTT) implementation. Concerns were also noted regarding the level of language support provided to students with autism.

The team observed considerable variability in the skills and needs of students placed in autism programs, potentially signifying a lack of clarity regarding which students require a more restrictive setting to ensure a free and appropriate public education (FAPE). During interviews, the consulting team heard that early

[10] This was also highlighted in the 2020 Council of the Great City Schools Review of Special Education Services report.

[11] Based on national data from the 2022-2023 school year, 40.6% of students with autism spent 80% or more of their school day in the general education environment.

[12] This number does not reflect any short- or long-term substitutes used to fill vacancies or the salaries of the support professionals that are also assigned to the classrooms.

childhood SWD may be placed in the KIDS program (the district's Pre-K programming designed for students with autism), because it is the only option of full-day early childhood programming. IDEA requires that placement decisions be based on a student's individual educational needs, and not the disability category.[13] The continued use of an 'Autism' program label can unintentionally reinforce category-driven placement practices and underscores the need for a redesigned continuum, as many students with autism can be appropriately served in less restrictive settings.

While systems and structures exist to support IEP teams in making data-based LRE decisions, schools often perceive these processes as burdensome and not meaningfully supportive of decision making. District staff are often perceived as 'gatekeepers' to placement decisions rather than as special education experts available to guide IEP teams as they make placement decisions based on students' LREs. Further complicating special education instructional quality in the district is the lack of authority that special education district staff have over special education implementation in the district. Staff in the Student Services Division (SSD) team do not have a formal mechanism available to them to hold schools accountable for special education instructional quality. While there is some initial professional learning provided to teachers in these specialized settings (and a developed system of support in extreme cases when programming is not working and intensive support is required), there are insufficient structures in place for the district to regularly monitor and align program implementation across schools.

While the Special Education Instructional Facilitators (SEIFs) assigned to schools should be well positioned to support instructional practices in the district, their time is largely spent on compliance and behavior. They are often assigned to such a broad span of duties that sustained instructional support becomes strained. Because they report directly to principals, they also do not have any formal authority to enforce special education instructional practices. This issue was also noted in the 2020 CGCS review of CCSD's Special Education Services report. Without the proper authority and influence, the district cannot assure quality and aligned Special Education programming and instruction across schools.

Peer districts take various approaches to special education instructional support. Based on publicly available information, BCPS has a school-based position with similar duties to SEIFs called Exceptional Children Education (ESE) Specialist. Their central office special education organization differs in that there are 11 Curriculum Supervisors assigned to disability categories (such as specific learning disability, autism, emotional/behavior disorder, etc.).[14] Special education instructional support is more regionalized in DISD and HISD. In both districts, schools are organized into geographic regions or feeder patterns and staffed with dedicated Coordinators, Compliance Specialists, and program-specific experts who each support a manageable cluster of schools. When roles are appropriately staffed and distributed, HISD and DISD are able to provide consistent IEP support, monitor IEP implementation, coach teachers, and respond to compliance needs in a timely and structured manner. This regional scaffolding promotes predictable oversight, strengthens instructional quality, and supports more consistent implementation of special education requirements across schools.

[13] Office of Special Education and Rehabilitative Services. *Letter to Williams* (1994).

[14] https://resources.finalsite.net/images/v1752689378/browardschoolscom/vk3f6x4afvwlhvsxeo1t/2025-26OrganizationalChart_RSBM_051325__002_.pdf.

While considerable work remains to be done, the district has ongoing efforts that are designed to ensure high-quality programming across the continuum of services. Specifically, the consulting team heard about and was provided documentation related to the following current district initiatives.[15]

- The development of a three-year multi-grade Houghton Mifflin Harcourt (HMH) Tier I pacing guide for the district's self-contained classrooms. The frameworks are being piloted and refined during the 2025-2026 school year and will be fully implemented during the 2026-2027 school year.
- Professional learning opportunities around the Science of Reading, writing instruction, scaffolding literacy instruction, and mandatory principal training specific to LRE.
- The continued collaboration with the University of Nevada, Las Vegas (UNLV) to help teachers obtain autism endorsements as well as generalist certifications.
- The Autism Leadership Cohort, in partnership with UNLV and the Autism Partnership Foundation Collaboration, was created to bring together CCSD teachers, staff, and principals to strengthen their ability to implement high-quality Applied Behavior Analysis (ABA) programming in the autism classroom setting through professional learning and coaching cycles. The goal of the cohort is to develop demonstration teaching classrooms and increase capacity of staff to support students with autism in the district.
- The purchase and implementation of educational software, such as Goalbook, 95 RAP Literacy Intervention, and TeachTown.
- Establishing special education principal collaboratives and school administrator workgroups focused on special education topics such as staffing allocations, school administrator training, inclusionary practices, supervising special education, and strengthening child find.

Implementation Strategies

The above initiatives are a step in the right direction. However, the district should ensure that all initiatives have a defined and articulated plan for scaling to all schools in the district. Additionally, the district should prioritize initiatives and resource allocation to inclusive settings to ensure both students and staff have access to resources they need. To help guide the district's implementation work, the consulting team has developed a set of implementation strategies that should serve as a starting point for the district and should not be interpreted as a fully inclusive implementation framework. These strategies will also require further refinement and modification from district staff.

Establish and communicate CCSD's vision for inclusive practices.

- Establish a written vision for CCSD's inclusive practices, including defining expectations for specially designed instruction within general education settings and clarifying the shared responsibilities of general and special education staff.
- Disseminate the written vision for CCSD's inclusive practices to schools and garner staff buy-in.

[15] This is not meant to be an exhaustive list of district initiatives related to special education, but rather a list that highlights specific initiatives related to Special Education programming in the district.

- Ensure all district communications/decisions are made in alignment with CCSD's vision for inclusive practices.

Redesign special education programming.

- Develop a plan for redesigning special education programming. This plan should include renaming any programming that references a disability category. The outcome from the plan should be a clear description of each Special Education program, including the timeline for full implementation, updated entry/exit criteria that can be used for IEP team consideration, non-negotiable instructional characteristics of each program, and classroom walkthrough tools for each program.
- Provide training to school administrators and special education school staff responsible for implementing programming on schools.
- Provide district-level support to school staff as they establish programs at schools. This includes providing resources necessary for program implementation and training staff on essential elements of the program.

Implement Special Education programs with consistency across schools.

- Develop a plan to scale up current initiatives that are not being implemented districtwide.
- Using the classroom walkthrough tools developed when redesigning Special Education programming, Special Education Regional Directors, SEIFs, and school administrators should periodically conduct classroom observations in all special education settings within a school. Directors and administrators should corroborate findings and develop goals for staff expectations on the next visit. As school administrators and SEIFs become more comfortable with the classroom walkthrough tool, they can begin to conduct the walkthroughs independently.
- When classrooms are identified that are not in alignment with program expectations, district staff should collaborate with school administrators and SEIFs to develop a more intensive job-embedded intervention plan to ensure consistency of services across schools.

Ensure that placement decisions are driven by student needs and LRE requirements.

- Align the position title of elementary resource special education teachers with secondary teacher titles (e.g., collaborative co-teacher titles) to emphasize inclusive practices.
- If necessary, revise special education staffing models for instructional aides in inclusive and general education settings.
- Actively seek solutions to gradually reduce caseload maximums for special education teachers working in inclusion/resource settings.

Full implementation of this recommendation would likely take up to five years, which aligns with current U.S. research showing that a sustained, phased implementation is essential for improving outcomes for SWD. National implementation science guidance emphasizes that districts need multiyear, scaffolded

structures to build capacity, strengthen instructional quality, and ensure fidelity across schools.[16] By adopting a five-year plan, the district follows the evidence-based structure used across the U.S.: establishing foundational systems in early years, strengthening instructional practice and fidelity, and scaling and sustaining inclusive, high-quality services. This scaffolded approach directly supports the district's expected outcomes related to increased inclusion, stronger instructional quality, reduced reliance on restrictive programs, and greater alignment between policy and practice.

3 Implement a Content-Based Language Instruction framework to narrow the achievement gap for English language learners.

Background and Context

Board Policy P-6165 establishes the district's responsibility to ensure that English language learner (ELL) students meaningfully participate in grade-level, academically rigorous instruction that integrates content and language development and is aligned to state academic and English language development standards. The policy calls for a consistent, districtwide system for English language acquisition that accelerates academic language development across all content areas, eliminates achievement gaps, and supports students in gaining English proficiency while accessing core instruction. It further assigns shared accountability to principals, educators, and central departments to provide qualified instruction, targeted supports, professional learning, and action plans to address ELL achievement disparities.

In February 2026, the consulting team observed two dozen classrooms across eight CCSD elementary, middle, and high schools. These schools were chosen based on their ELL student percentage, geography, Title I status, and programming (e.g., Focused Language Study, English Language Development, Dual Language). In addition to observing classrooms, the consulting team interviewed school leaders while on site to better understand the challenges they face in supporting ELL students.

Assessment

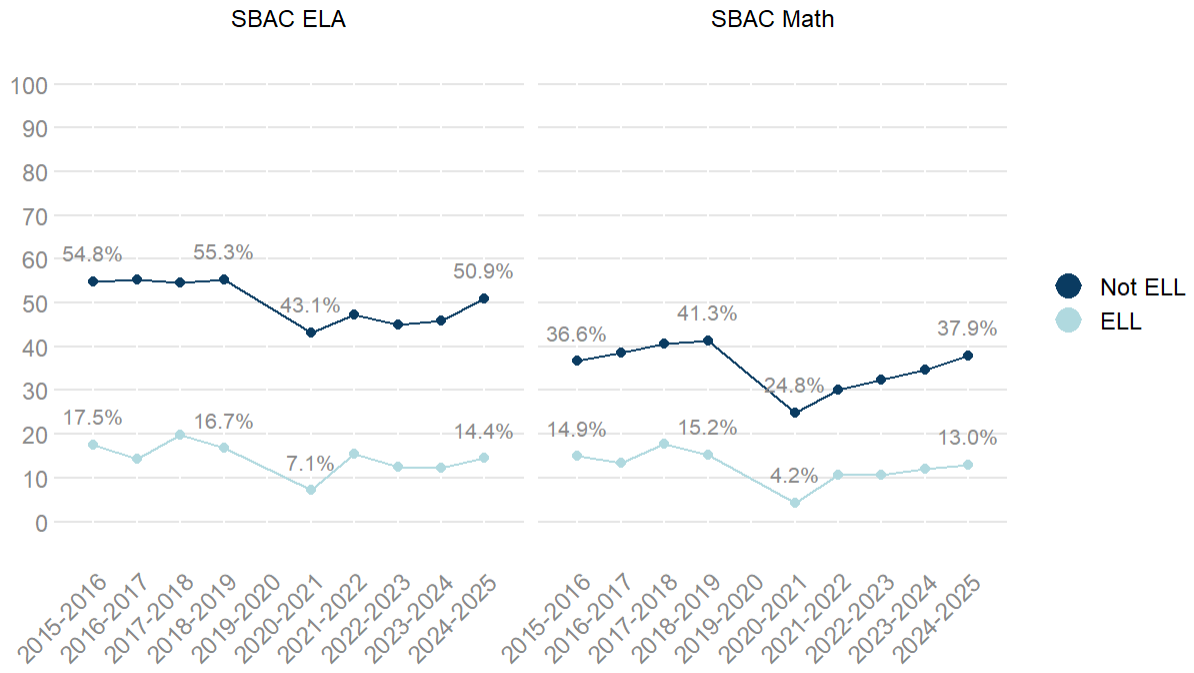
The consulting team identified gaps between the standard set in Board Policy P-6165 and the day-to-day practices at CCSD schools, the outcome of which has been persistent academic achievement gaps between ELL and non-ELL students.

In the 2025-2026 school year, ELL students represented 15.7% of total district enrollment, or 45,467 students. The district currently provides ELL supports almost exclusively through English as a second language (ESL) instructional models, which are embedded unevenly across schools. While the district has developed some language scaffolding resources and provided targeted supports, implementation is inconsistent and highly dependent on school-level practices. As a result, ELL instructional supports have not been deployed in a manner sufficient to meaningfully improve student outcomes or systemwide performance.

[16] American Institutes for Research: Center of Multi-Tiered Systems of Supports https://mtss4success.org/implementation; U.S. Department of Education Fiscal Years 2022-2026 Strategic Plan (Goal 3) https://www.ed.gov/sites/ed/files/about/reports/strat/plan2022-26/strategic-plan.pdf.

District academic data indicate that ELL students are significantly underperforming compared to non-ELL peers across multiple outcome measures. Smarter Balanced Assessment Consortium (SBAC) results show a persistent and substantial achievement gap (Figure 6). On the 2024-2025 SBAC assessments, 50.9% of non-ELL students demonstrated proficiency in ELA, compared to 14.4% of ELL students. In Math, 37.9% of non-ELL students demonstrated proficiency, compared to 13.0% of ELL students. These gaps have remained largely unchanged over time, suggesting that existing instructional approaches have not been sufficient to accelerate ELL academic achievement.

Figure 6. SBAC Proficiency Rates, ELA and Math, ELL and Non-ELL Students, 2015-2016 to 2024-2025



Note. SBAC performance during the 2019-2020 school year is omitted due to the COVID-19 pandemic.

Source. CCSD academic performance data

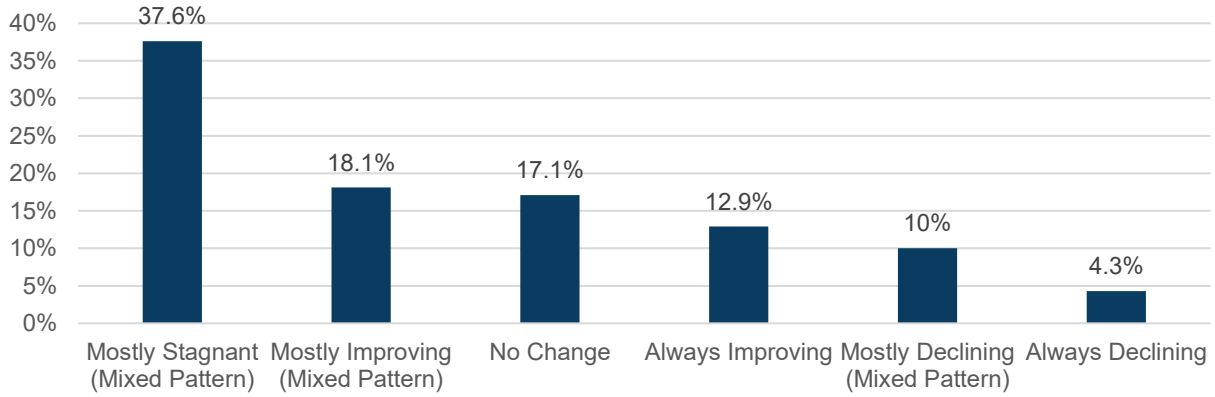
Language acquisition data further underscore the limitations of the district's current approach. Results from the World-Class Instructional Design and Assessment Assessing Comprehension and Communication in English State-to-State (WIDA ACCESS), an annual English language proficiency assessment for multilingual learners in Kindergarten through Grade 12 that CCSD uses to evaluate student proficiency, show stagnant growth over nearly a decade, suggesting that the current ESL-centric model is not producing sustained academic language development. The assessment includes reading, writing, listening, and speaking components, and students are scored on a 6-point scale: Entering, Emerging, Developing, Expanding, Bridging, and Reaching. Figure 7 depicts trends in the district's WIDA ACCESS scores between 2015-2016 and 2024-2025. Out of the 137,855 unique students in the original dataset, the consulting team analyzed 99,790 student records having at least two years of testing data. Each student is grouped into one of the categories described below:

- Mostly Stagnant: The student sometimes moves up or down but stays at the same level in the majority (more than half) of their tested years;

- Mostly Improving: The student improves in most years but not consistently, with growth interrupted by flat or declining years;
- No Change: The student remains in the exact same achievement level every year they are tested;
- Always Improving: The student's achievement level increases on every observed test, with no flat or declining years;
- Mostly Declining: The student's achievement level declines in most of their testing intervals, with occasional years of no change or modest improvement; and
- Always Declining: The student's achievement level decreases on every observed test, with no flat or increasing years.

According to the district's WIDA ACCESS data, over half of students (54.7%) experienced limited to no language proficiency growth (i.e., "Mostly Stagnant" and "No Change") over the last 10 years.

Figure 7. Trends in WIDA ACCESS Proficiency Scores, CCSD, 2015-2016 to 2024-2025



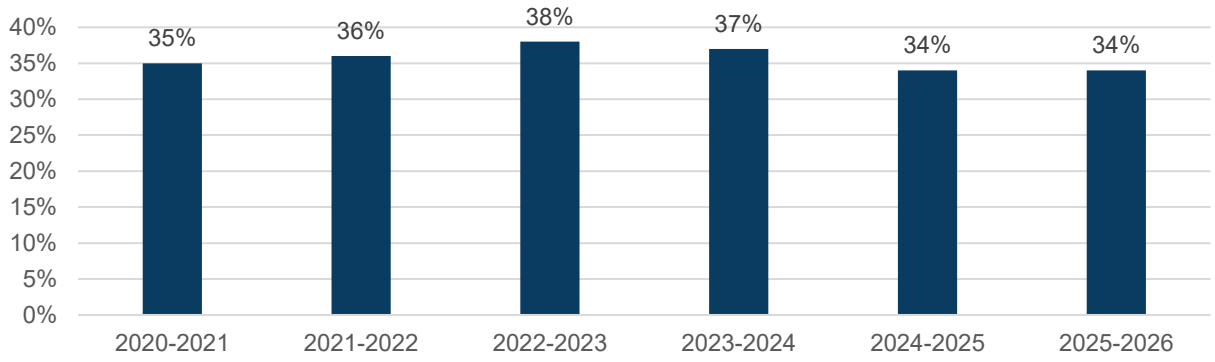
Source. CCSD WIDA ACCESS scores provided by the district

Progress monitoring practices further constrain the district's ability to improve outcomes. Interviews with district leaders, regional staff, and school administrators revealed no consistent districtwide protocol for monitoring interim language growth. Practices vary significantly by school and principal, and many schools rely primarily on annual WIDA ACCESS results rather than ongoing analyses of language development data. School visits and classroom observations reflected a wide range of understanding by principals and teachers regarding proficiency levels and domain scores, and in some cases, there was a limited awareness of which students are identified as English Learners. The following additional observations were made based on classroom observations conducted by the consulting team:

- Lack of consistent integration of language development within Tier I instruction, with lessons primarily delivered in English without structured supports to ensure comprehension and participation for ELLs;
- Limited expectations for student language production, with few structured opportunities for ELLs to engage in academic speaking or writing aligned to content objectives; and
- Inconsistent use of scaffolds (e.g., visuals, sentence stems, structured peer interaction), resulting in some ELL students disengaging or unable to access grade-level tasks.

Collectively, these conditions have contributed to a large population of long-term ELL students (Figure 8), defined as students remaining classified as ELL for six or more years. The primary goal of an ESL program is for students to attain full English proficiency and reclassify; however, from 2020-2021 through 2025-2026, 34% to 38% of all ELL students were long-term ELLs, although the percentage has slightly declined in recent years.

Figure 8. Long-Term ELL Percentage, 2020-2021 to 2025-2026



Source. CCSD ELL enrollment data

These challenges reflect a structural limitation in how language development is integrated into core instruction, rather than isolated implementation issues. Language development appears to be treated as a supplemental service instead of a shared responsibility across all content areas. Research on second language acquisition consistently demonstrates that students develop academic language most effectively through meaningful engagement with rigorous academic content, rather than through isolated language instruction.

To address these issues, the district should implement a districtwide content-based language instruction (CBLI) framework as a core Tier I instructional approach. CBLI is a research-based framework that intentionally integrates language development into daily instruction across all content areas. This approach emphasizes communicated language objectives, sequenced instruction, and consistent scaffolding, enabling students to build academic knowledge and language proficiency simultaneously.

Implementation Strategies

CBLI aligns closely with the WIDA English Language Development Standards, and it would shift language development from a programmatic add-on to a core instructional expectation, increasing consistency, equity, and accountability across schools. To implement a CBLI framework, CCSD should take the steps recommended below.

Define and communicate a districtwide CBLI framework.

The district should establish explicit expectations for Tier I instruction that integrate content and language development, including:

- Required use of content and language objectives aligned to WIDA ACCESS proficiency levels;

- Clear expectations for student language production, such as structured speaking and writing in complete and increasingly complex sentences; and
- Consistent use of scaffolds that support language development within grade-level content.

This framework should clarify what "research-based instruction" looks like in daily practice and provide common language for teachers, principals, and instructional supervisors.

Build leadership accountability at the principal and regional levels.

Interviews emphasized that successful implementation depends on principals' understanding that language development is a core instructional priority, not an optional program. To support this shift, the district should:

- Embed CBLI expectations into principal coaching, regional collaboratives, and instructional leadership structures;
- Train principals and school supervisors on CBLI-aligned instructional expectations; and
- Define leadership responsibilities for monitoring and supporting language-embedded instruction.

These actions ensure that CBLI exists not only at the teacher level, but also within the district's instructional leadership system.

Leverage school improvement planning to strengthen accountability.

Recent legislation (Assembly Bill 335) requiring schools to set ELL goals creates a critical lever for implementation. The district should use the School Improvement Plan process to:

- Require instructionally specific ELL goals grounded in CBLI practices;
- Document implementation of research-based language strategies at each school;
- Disaggregate outcomes for ELL and non-ELL students in areas where language demands affect performance; and
- Support principals and supervisors in monitoring progress toward ELL-related goals.

Using School Improvement Plans as an accountability mechanism anchors CBLI in an existing planning and reporting structure, rather than creating a parallel system.

Strengthen monitoring and use of interim language data.

Currently, the district relies heavily on annual WIDA ACCESS data, which are unavailable until late in the school year and limit timely instructional adjustment. To address this gap, the district should:

- Establish districtwide expectations for interim language progress monitoring;
- Require consistent use of available tools (e.g., Summit K12) to track beginning-, middle-, and end-of-year growth; and

- Integrate interim language data into instructional planning, school identification, and support decisions.

Consistent progress monitoring would allow the district to identify stalled language growth earlier in the year and respond with targeted instructional supports.

Align professional learning to implementation expectations.

The district currently offers extensive professional learning related to ELL instruction, including vendor-provided training. However, participation and implementation are largely optional. Under CBLI, professional learning should:

- Be explicitly aligned to districtwide instructional expectations;
- Focus on examining student application of interpretive and expressive language skills as well as practical application within Tier I classrooms; and
- Be reinforced through coaching, observations, and feedback, rather than stand-alone sessions.

Ensuring coherence between professional learning, instructional expectations, and classroom implementation will be foundational to achieving desired outcomes across schools.

While the implementation of a districtwide CBLI framework is an essential near-term strategy, it should be understood as a foundational step rather than the district's final goal for multilingual education. CBLI provides an immediate, scalable approach to improving access to grade-level content and accelerating academic language development for ELL students within existing instructional structures. However, CBLI alone is not designed to fully realize the long-term academic, linguistic, and biliteracy outcomes associated with high-quality multilingual education systems.

Over time, and with sufficient funding, the district should move toward expanding Dual Language programs as the long-term instructional model for multilingual learners. When implemented well, Dual Language programs support stronger academic outcomes, higher rates of English proficiency, bilingualism, and biliteracy, and improved long-term student achievement.

4 Reduce reliance on Acceleration Academies and redirect resources to school-based programs and support for credit-deficient high school students.

Background and Context

Federal accountability standards require states to track and report the percentage of high school students who graduate within four years, alongside their peers who entered ninth grade in the same school year. In Nevada, students must earn 23 credits and take a college entrance exam to receive a standard diploma.[17] Credit-deficient students are those who are not making sufficient progress to graduate with their four-year

[17] Nevada Department of Education Classes of 2025-2028 Graduation Requirements.

cohort. Nevada also monitors students who graduate within five years, but this measure is less important in the state accountability system.

In the current school year, over 2,000 credit-deficient CCSD high school students are served through a contracted, external partner, Acceleration Academies. Acceleration Academies currently has four sites that serve CCSD students in Grades 9 through 12.[18]

Program Design

The partnership between CCSD and Acceleration Academies is distinct, as the program operates as a CCSD school under NDE accountability standards. Acceleration Academies runs the full alternative education program, and is responsible for all aspects of operations, including facility management, hiring Nevada-licensed staff, and providing year-round, extended-day instruction aligned to state standards, ultimately leading to a CCSD-issued diploma. The organization handles student recruitment, intake, academic assessment, individualized scheduling, daily instruction, course administration, attendance, record maintenance, and supervision.

Although largely independent, Acceleration Academies staff receive targeted support from CCSD, such as assistance with student transfers, documenting credits and graduation requirements, and training in health, safety, and multilingual education. Students in the program also have access to district special education services and “grab and go” meals through CCSD food services.

Designed to help credit-deficient students get back on track, Acceleration Academies applies a hybrid instructional model using the Edmentum learning platform. Students progress through structured units of study, with the goal of completing 0.5 credits every 21 calendar days, enabling them to potentially earn up to eight full credits per year.[19] Intensive adult support is provided through Graduation Candidate Advocates, Content Coaches, Career Coaches, Life Coaches, and academic support staff, with the objective of providing consistent monitoring, intervention, and coordination of academic and wraparound services to accelerate student progress toward graduation.

Student Profile

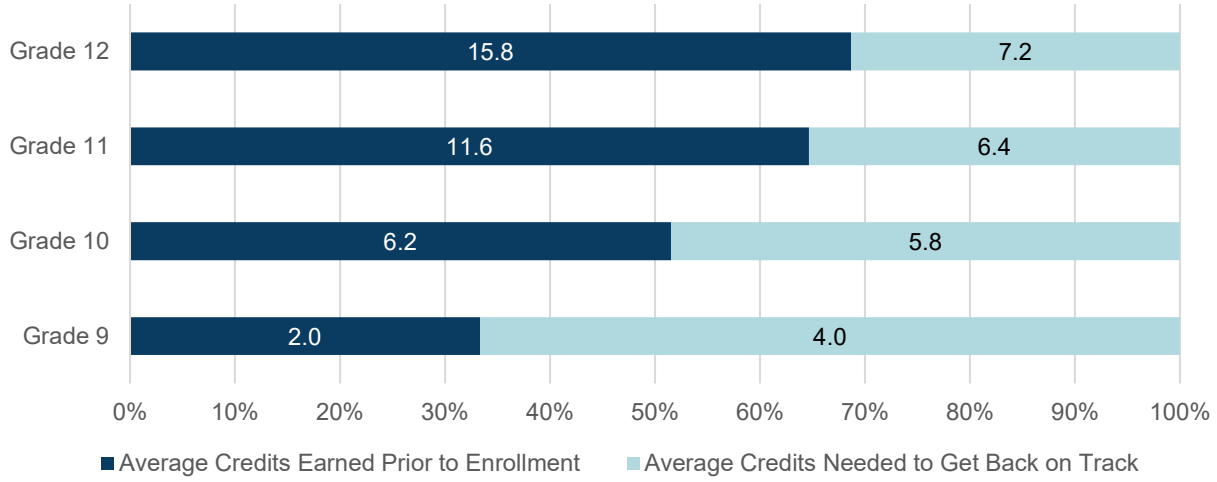
The students who enroll in Acceleration Academies are typically high school seniors who are not on track to graduate. In 2024-2025, this accounted for about 79% of students in the program.[20] On average, these seniors had a gap of 7.2 credits to meet their graduation requirements, a little over one year behind in their credit earning (Figure 9).

[18] Three of these sites are open enrollment sites and one exclusively serves students who are exiting alternative education settings.

[19] This rate of credits earned per year is like the number of credits a students could earn in a high school with block scheduling and is approximately two credits per year faster than is necessary to earn a Nevada standard diploma.

[20] Thus far in 2025-2026, about 56% of enrollees are credit-deficient seniors.

Figure 9. Average Number of Credits Earned Prior to Enrollment in Acceleration Academies for High School Students Not on Track to Graduate, 2024-2025



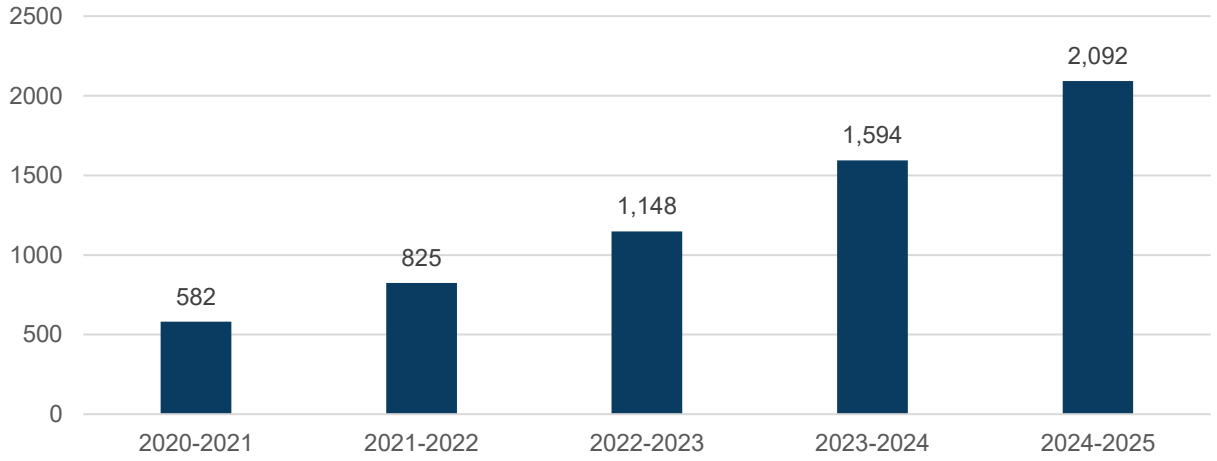
Note. This analysis was limited to high school students who were not on track to graduate. Students need 23 credits to earn a standard diploma in Nevada, or approximately six credits per year.

Source. CCSD administrative data

Program Enrollment and Costs

The number of students enrolled in Acceleration Academies has increased each year since the beginning of the partnership in 2021. Between 2020-2021 to 2024-2025, annual enrollment increased by 1,510 students, or 259% (Figure 10).

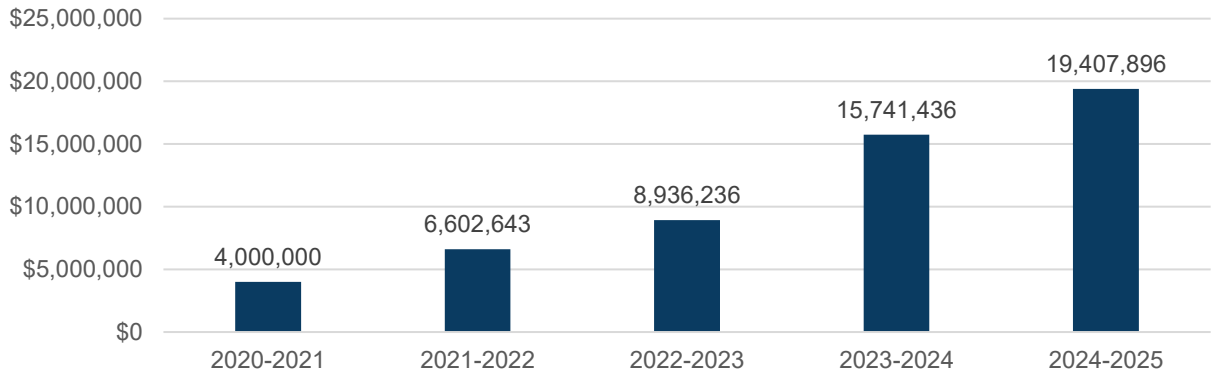
Figure 10. Acceleration Academies Enrollment, 2020-2021 to 2024-2025



Source. CCSD administrative data

Along with student enrollment, the cost of the program increased over this period. Total costs rose by $15,407,896 (or 385%), a faster rate of growth than enrollment. Part of this increase is attributable to adjustments to the NDE Pupil-Centered Funding Plan (Figure 11).

Figure 11. Acceleration Academies Program Costs, 2020-2021 to 2024-2025



Source. CCSD procurement data

Assessment

This section examines program effectiveness in achieving its two most important goals: accelerating credit earning and graduating students with their four- or five-year cohort.

Rate of Credit Earning

Acceleration Academies aims for each student to earn 0.5 credits every 21 days, which would allow them to accumulate up to 17 half credits and eight full credits in a school year. As shown in Table 3, only 2% to 7% of students earned eight or more credits each year, although the top four credit-earning levels showed increases over the past five years. Given that the average senior needs to make up seven credits (referenced in Figure 9 on page 34), this rate of credit earning is not enough for many students to graduate on time.

Table 3. Percentage of Students Earning Each Range of Credits by School Year, 2020-2021 to 2024-2025

School Year	N Students	0 Credits	0.5 to 1 Credits	1.5 to 2 Credits	2.5 to 4 Credits	4.5 to 7.5 Credits	8.0 or More Credits
2020-2021	488	0.2%	54%	19%	18%	6%	2%
2021-2022	1086	0.5%	38%	23%	24%	11%	3%
2022-2023	1505	1.7%	25%	21%	26%	20%	7%
2023-2024	2323	4.1%	24%	21%	28%	16%	6%
2024-2025	1982	0.2%	22%	21%	31%	21%	5%

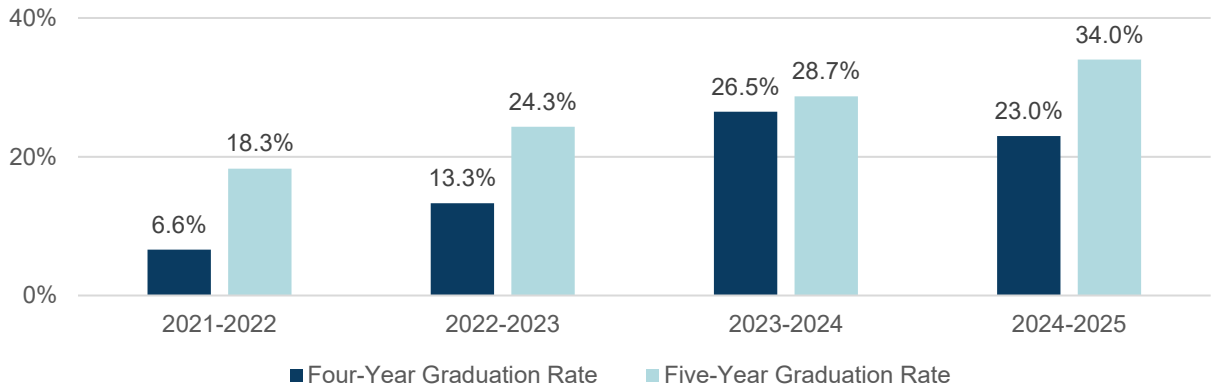
Note. Percentages may not sum to 100% due to rounding. These percentages reflect credits earned in one year-round school year (fall-spring-summer), regardless of entry and exit dates.

Source. CCSD administrative data

Graduation Rates

Five-year graduation rates for students at Acceleration Academies increased steadily over the past four years, indicating that the program has become more effective over time at graduating students with their four- or five-year cohort. However, recent rates indicate that approximately one-fourth of students who enroll in Acceleration Academies will graduate on time with their four-year cohort, and approximately one-third will graduate five years after starting high school (Figure 12).

Figure 12. Acceleration Academies Graduation Rates, 2021-2022 to 2024-2025



Note. Graduation rates describe confirmed graduates from the prior school year (e.g., rates from 2024-2025 describe the four- and five-year graduation rates from the 2023-2024 school year).

Source. Nevada Accountability Portal

Considering only students who graduated from Acceleration Academies, the consulting team found further evidence that the pace of credit earning is relevant to student success. Looking across five years of graduates, the median number of credits earned by on-time graduates was 8, and the median credits earned per year for those who graduated early was 11. Graduates with a median of 6 credits earned per year did not graduate with their four-year cohort (Table 4).

Table 4. Graduation Status and Median Rate of Credit Earning, Students Who Graduated From Acceleration Academies, 2020-2021 to 2024-2025

Graduation Status	Percent of Graduates	Number of Graduates	Median Credits Earned Per Year
Graduated Early	17%	243	11
Graduated On Time	34%	521	8
Graduated Late	47%	668	6

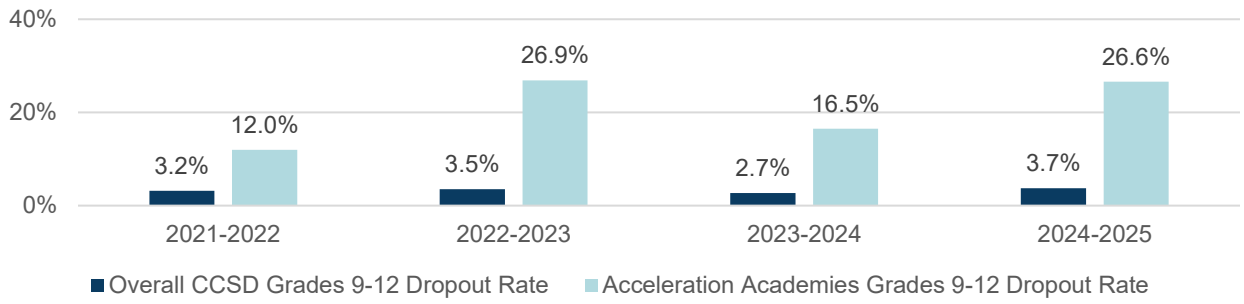
Note. This analysis is limited to students who graduated from Acceleration Academies (n = 1,432). Graduation status was determined by comparing students' graduation years to their four-year cohort year. The percentage of graduates who graduated early or on time was 53%.

Source. CCSD administrative records

Dropout Rates

Between 2021-2022 and 2024-2025, dropout rates for students in the Acceleration Academies program ranged from 12.0% to 26.9%. This suggests that, while the program met the needs of some students, others did not benefit and may have been better served by programs managed directly by the district or their original high schools.

Figure 13. Acceleration Academies and CCSD, Grades 9-12 Dropout Rates, 2021-2022 to 2024-2025



Note. Dropout rates describe confirmed dropouts from the prior school year (e.g., 2024-2025 rates describe the percentage of students who dropped out of school in 2023-2024).

Source. Nevada Accountability Portal

CCSD's partnership with Acceleration Academies provides a flexible, clearly defined pathway for credit-deficient students, and the program operates independently with minimal district support. Financially, the arrangement is revenue-neutral for the district; however, the program has fallen short of its stated goals. While Acceleration Academies have demonstrated some success, continued investment in the program for students who are not successful limits resources available for other school and district support programs for credit-deficient students.

Implementation Strategies

The consulting team proposes a three-phase strategy for reducing reliance on Acceleration Academies, having them serve only students expected to benefit from the program, and redirecting resources to other supports for credit-deficient high school students.

Modify the partnership with Acceleration Academies to target students who are most likely to benefit from the program.

- **Request from Acceleration Academies a profile of students who respond best to the program.** The profile should rely on results from their Graduation Persistence Index (GPI), demographic data, information about credit deficiency upon enrollment, the pace of credit earning, internal progress measures, etc., as well as information about the means by which students are connected to the program (e.g., outreach based on the district's did not enroll [DNE] list, registrations during the open enrollment period, and school-based referrals).

- **Establish a new Acceleration Academies referral process based on these learnings.** This should include a process for transferring unsuccessful students back to CCSD; and
- **Establish a new contract reflective of the new strategy.** This may include an expected limit on the number of students served each year based on prior graduation rates and rates of students who meet the credit earning benchmarks.

Develop programs for credit-deficient students at each high school.

Program options should be developed through a partnership between the Education Services Division, Region Superintendents, School Associate Superintendents, high school principals, and the Guidance and Counseling Department, based on a comprehensive understanding of the often complex needs of credit-deficient students (e.g., lack of motivation/unclear purpose for finishing high school, low attachment to or disengagement from school, unfinished learning, low academic self-efficacy, mental health concerns, and economic needs). The Acceleration Academies will continue to be a viable option for students who are highly motivated to finish high school and who benefit from the program's flexibility, as well as 24-hour, year-round access to the program's learning platform.

Monitor progress.

Monitoring the progress of these new strategies will center around three key metrics for all credit-deficient students, regardless of whether they are engaged via school-based or vendor-supported programming.

Progress Monitoring Within a School Year

- **Program Participation**. Maintain consistent records of internal and external program participation; monitor progress and recommend changes if students do not steadily close credit earning gaps.
- **Credit Earning Rate**. Monitor credits earned each semester to identify students who are catching up, maintaining pace, or falling further behind.
- **Attendance Rate**. Track student attendance in both traditional and alternative programs as leading indicators of improved academic engagement.
- **On Track for Graduation Status**. Monitor progress toward graduation, including credit earning and meeting other benchmarks (e.g., completion of core credits, ACT participation).

Monitoring Long-Term Success Across School Years

- **Dropout Rate**. Report annually the proportion of students who leave school without earning a diploma by support program.
- **Graduation Rate**. Report annually the percentage of credit-deficient students who ultimately meet all requirements and earn a standard diploma within four or five years.
- **Postsecondary Transition Enrollment and Success**. Report annually the number of formerly credit-deficient students who enroll in college, vocational training, or enter the workforce after graduation.

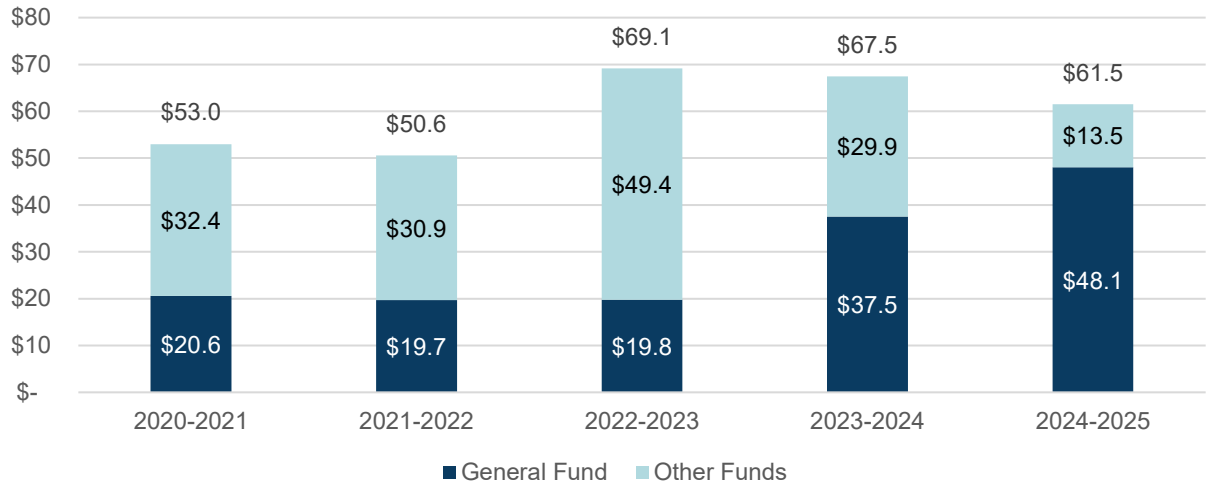
Chapter 2: Operational Recommendations

5 Implement a centralized software asset management program.

Background and Context

Over the past five years, CCSD General Fund spending on software and licensing has more than doubled. Figure 14 presents CCSD's five-year software and licensing spending from the General Fund and other funds, based on district procurement data. The consulting team noted that particular software titles or licenses were purchased with the General Fund in some years, but with other funds in other years. Thus, while overall software spending increased by 16%, General Fund spending on software increased by 133%, from $20.6 million to $48.1 million.

Figure 14. CCSD Software and Licensing Spending Across Funds (in $ Millions), 2020-2021 to 2024-2025

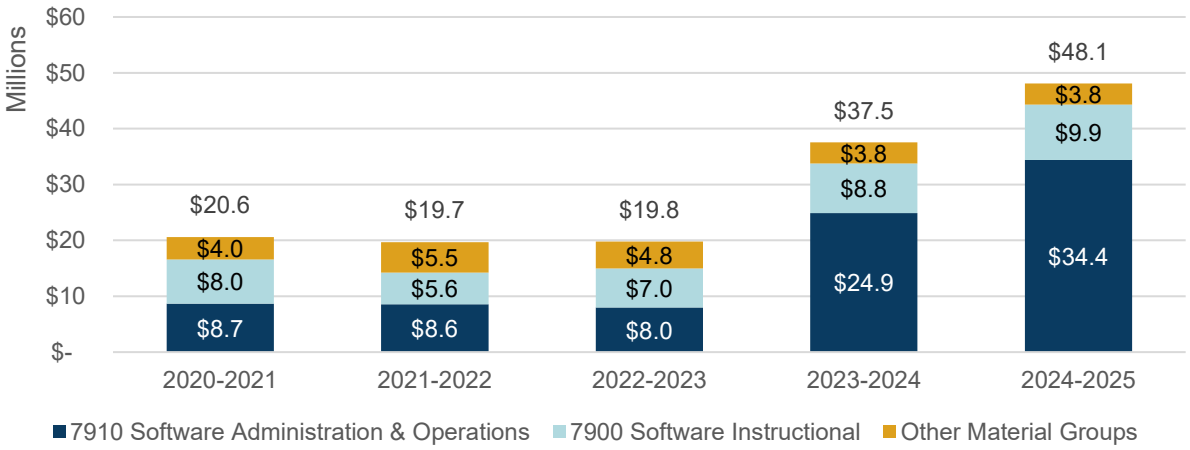


Source. CCSD Purchasing Department

The divergence between the growth of all funds and growth of the General Fund is largely attributable to the expiration of federal ESSER funds. During the COVID-19 pandemic relief period, a substantial share of software purchases was funded through special revenue sources, including ESSER. As those funds expired, the cost of renewing those same software subscriptions shifted to the General Fund—a structural budget pressure that will continue. The district does not appear to have documented the extent to which ESSER-funded software requires future annual license renewals or ongoing subscription fees, and the full scope of that recurring obligation carried into the General Fund remains unquantified.

General Fund software spending is concentrated in administrative and operational categories. In 2024-2025, $34.4 million—72% of the $48.1 million General Fund software total—was classified under material group code 7910, Software Administration and Operations. Instructional software under material group code 7900 accounted for $9.9 million, or 21%. The remaining $3.8 million fell under other material groups. Figure 15 shows this breakdown over the five-year period.

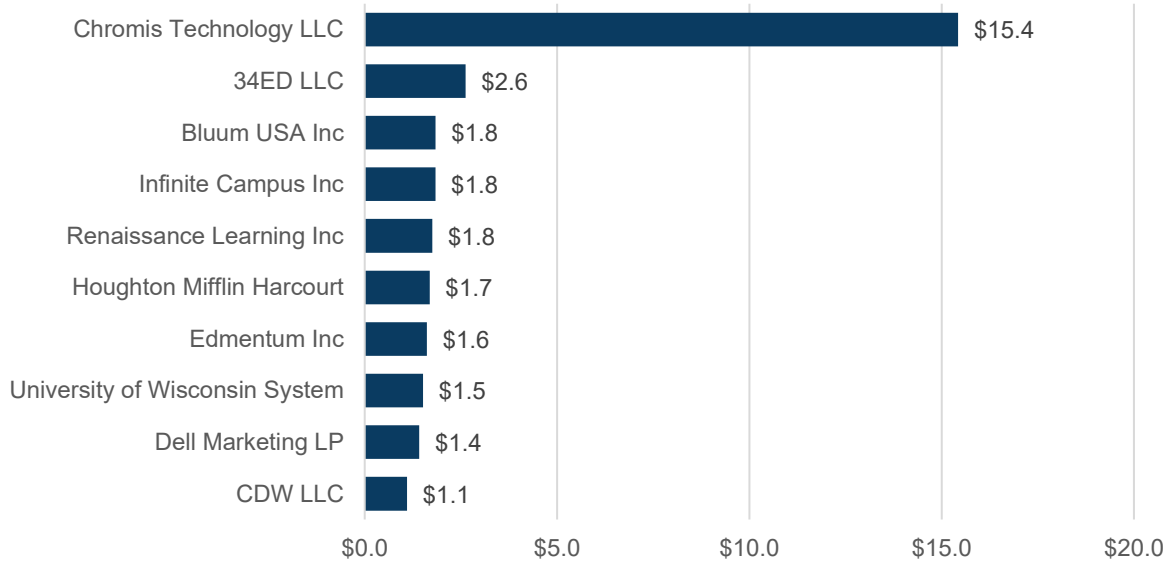
Figure 15. CCSD Software and Licensing Spending Across Funds (in $ Millions), 2020-2021 to 2024-2025



Source. CCSD Purchasing Department

The spike in administrative software spending—from $8.0 million in 2022-2023 to $24.9 million in 2023-2024 and $34.4 million in 2024-2025—was driven primarily by an increase in cybersecurity software, purchased from Chromis Technology LLC, which grew from $11,275 in 2020-2021 to $15.0 million in 2023-2024 and $15.4 million in 2024-2025. Figure 16 shows the top 10 General Fund software vendors in 2024-2025.

Figure 16. Top 10 General Fund Software Vendors (in $ Millions), 2024-2025

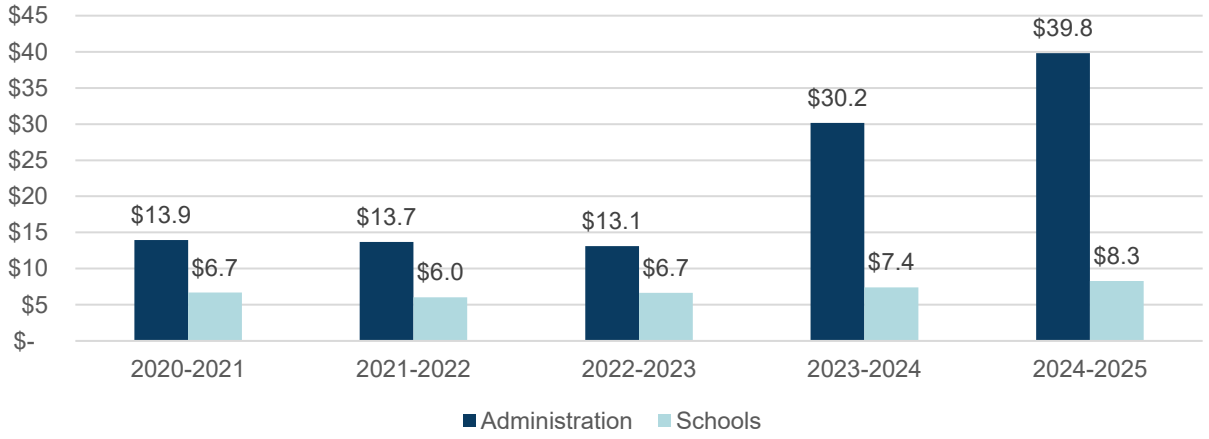


Source. CCSD Purchasing Department

General Fund software spending was also concentrated administratively. In 2024-2025, $39.8 million—83% of the General Fund total—was purchased through central administration, while $8.3 million was

purchased at the school level. Figure 17 shows the split between administrative and school-level spending over the five-year period.

Figure 17. General Fund Software Spending, Administration Compared to Schools (in $ Millions), 2020-2021 to 2024-2025



Source. CCSD Purchasing Department

This spending categorization is further complicated by several factors, which are listed below.

- The district purchases software across the General Fund and special revenue funds, sometimes using both in the same year for the same product.
- Software purchases are frequently bundled with training, support, and physical materials, making it difficult to isolate the software cost. These bundles also increase the overall total cost of software ownership, but these associated costs are not easily discernable for all software/license purchases within the purchasing data. For this reason, the purchasing data likely understates true software bundle expenditures.
- Budget line items for instructional technology are distributed across multiple categories, rather than consolidated in a single place.

Two examples illustrate how CCSD's purchasing data can mask the true software-only price in some cases, while hiding the full scale of districtwide software spending and future renewal obligations in others. In the first example, the district listed a $96.0 million Amplify Science purchase in 2021-2022 as a major instructional software investment. A review of the underlying line items showed that only $83,975 was specifically for software, with the majority of the expenditure covering consumable grade-level kits and notebooks. In the second example, three separate CCSD departments independently purchased the same product, Achieve 3000, over the same multi-year period: the Curriculum and Instruction Division spent $7.3 million in 2022-2023, the Curriculum and Professional Development Department spent $11.2 million across 2021-2022 and 2022-2023, and the Grants Development Department spent $5.6 million in 2020-2021, for a combined district total of $25.8 million, with an additional $0.2 million paid directly by individual schools. Of that total, 99.7% was paid from special revenue funds, but future renewal obligations will fall entirely to the General Fund. These purchases were made without a centralized record or coordinated procurement strategy.

The district's 2025-2026 budget includes $82 million in the technology supplies line item. Given that schools maintain separate budgets and can each spend up to $100,000 per year with a single vendor without central oversight, and that software costs are distributed across multiple categories, CCSD's actual annual investment in software and technology likely exceeds what procurement data alone reflects. The General Fund exposure, in particular, will continue to grow as ESSER-era software subscriptions come due for renewal without a dedicated funding source to absorb them.

Assessment

CCSD does not maintain a centralized system to track what software it owns, how licenses are used, whether licenses are used, whether purchases are duplicative across departments, or which subscriptions require renewal. Interviews with Technology and Information Systems Services (TISS), purchasing, instructional technology, and administrative staff confirm that CCSD lacks a coordinated strategy for administrative and instructional software. Purchasing decisions are made independently across departments and schools, with no centralized inventory of entitlements or usage data to inform renewal decisions. This has produced an environment of inconsistent procurement, limited cost visibility, and insufficient evaluation of whether tools are used or effective.

The SAFE List Creates Proliferation Without Accountability

While CCSD has made substantial investments in instructional technology infrastructure, hardware, and software, the absence of systematic follow-ups after implementation limits the district's capacity to identify usage barriers, inform decision-making and purchases, drive continuous student improvement, and provide equitable access for all students. Interviews, focus groups, and school observations indicate that instructional technology investments are not consistently strengthening instructional practice, largely due to the absence of a coherent districtwide technology strategy and evaluation process. CCSD does not routinely evaluate whether purchased instructional software is implemented with fidelity or whether it positively impacts student learning.

CCSD schools select instructional software independently using the district's Software Approved for Education (SAFE) List, which currently includes 329 approved titles. Some of the SAFE List software titles are primarily instructional tools, while others are assessment tools. Table 5 lists the subjects and number of applications included in the district SAFE List.

Table 5. SAFE List Summary by Subject Area[21]

Subject	Number of Applications
Mathematics	65
Reading/Literacy/ELA	57
CTE	35
Science	34

[21] Some software on the SAFE List covers multiple subjects.

Subject	Number of Applications
Social Studies	29
Assessment	29
Language/ELL	23
Writing	21
Teachers/Instruction/Planning	20
Emotional Learning	18
Communication	17
Intervention	15
College and Career Prep	15
Technology/Computer Science	15
Music/Arts	7
Health	5

Source. Compiled by the consulting team, February 2026

The breadth of the SAFE List creates problems, which are discussed briefly below.

- There are many options by category. For example, there are 65 different mathematics and 57 different reading/literacy/ELA items. This could prove daunting for school-based staff, who have to navigate an extensive catalog without guidance on cost, effectiveness, or district preference.
- No central oversight exists as to what is purchased at the different sites. The district does not have complete cost documentation for the entire catalog.
- The district has neither collected nor analyzed usage data for these packages, which could help a school make an informed selection. The district can provide a separate list of the number of student logins made available via eight different “academic improvement programs,” but creating a student application login does not confirm active use or academic impact.
- Having multiple titles in the same areas can pose a challenge for students transferring between CCSD schools. They may encounter different platforms and instructional tools at each school, creating continuity gaps that make it difficult for teachers to assess incoming students' educational needs or learning gaps.
- Some of the software titles purport to include AI elements, but CCSD currently lacks an established policy on allowing students to interact with AI.

The district does not have structured processes to assess staff or student use of instructional technology or satisfaction with available tools and applications. Only limited data are collected in the districtwide annual surveys (Table 6). In internally administered surveys from 2019-2020 to 2024-2025, the vast majority of CCSD staff believed there were adequate instructional materials or basic supplies. Unfortunately, these items were not asked separately, so it is not possible to determine whether staff feel the problem is more

one or the other. Student responses related to instructional use of technology indicate that, over the last five years, the vast majority of students are learning with technology in their school (Table 6). Parents were not asked questions regarding their students' use of technology in school.

Table 6. CCSD Staff and Student Survey Results Regarding Technology, 2019-2020 to 2024-2025

	Percent Agreement with Statement					
Survey Statement	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
STAFF: There are an adequate number of instructional materials and basic supplies at this school.	81.4%	88.5%	85.8%	87.9%	89.4%	91.1%
STUDENT: I am learning with technology such as computers, mobile devices and the Internet at this school.	86.6%	91.3%	90.2%	89.5%	88.0%	88.1%

Source. CCSD staff and student surveys

Peer Districts Confirm the Gap — and the Opportunity

CCSD's lack of centralized software asset management is not uncommon among large districts, but the district's rate of spending growth makes inaction increasingly costly. A review of the five peer districts reveals that only one has implemented a SAM program, while the others manage software spending through procurement controls alone or not at all (Table 7).

Table 7. Peer District SAM Comparison

District	SAM Solution
LAUSD	FlexNet Manager Suite
BCPS	Procurement workflow only
CMS	Cherwell (end-of-life December 2026)
DISD	None identified
HISD	None identified
CCSD	None identified

Source. Compiled by the consulting team, March 2026

LAUSD has the most developed SAM program among the peer group. LAUSD maintains a dedicated director position for asset and software compliance, a position whose sole responsibility is overseeing districtwide software enterprise licensing, vendor contract negotiation, asset management, and E-Rate compliance. In March 2025, LAUSD issued a formal request for proposals (RFP) for renewal of its FlexNet Manager Suite—its dedicated SAM platform—requiring full license inventory, usage normalization, entitlement reconciliation, and integration with its existing BMC Discovery system. LAUSD's program represents the staffing and technology model CCSD should adopt.

BCPS operates a procurement-governance model rather than a full SAM program. All software purchases require approval by a Software Evaluation Committee and are processed through an automated workflow,

but the district does not track ongoing license usage or conduct reconciliation between entitlements and actual deployment. The BCPS approach controls what is purchased, but does not optimize what is owned.

CMS uses Cherwell, an IT Service Management (ITSM) platform with asset tracking capability. Cherwell reaches end-of-life on December 31, 2026, after which its vendor will no longer provide support or security updates. Neither HISD nor DISD has a centralized SAM program.

A Formal SAM Program Addresses These Conditions

A SAM program establishes a centralized inventory of all software licenses and subscriptions, tracks actual usage against entitlements, and embeds governance into renewal and purchasing decisions. With this structure in place, the district can identify unused and underutilized licenses before renewal, consolidate redundant applications purchased independently across departments and schools, and negotiate vendor agreements based on documented need and usage, rather than estimates.

Gartner's 2024 survey of global Chief Information Officers found that 94% of respondents included cost reduction and 89% included license optimization among their SAM program objectives, yet fewer than half reported a fully centralized approach to day-to-day license management. The same research found that unused applications account for 30% to 50% of software assets in organizations without active SAM programs.[22] These conditions are present at CCSD. While reported savings in mature enterprise environments have reached 30%, the realized savings vary based on baseline process maturity and scope of implementation.[23] Beyond cost savings, a SAM program gives district leadership reliable data to make expansion, standardization, or retirement decisions for each software tool; improves budget predictability by documenting renewal timelines and subscription obligations; and reduces the risk of vendor audit findings and licensing non-compliance.

The key benefits of a comprehensive SAM program for an organization are:

- Comprehensive inventory and visibility;
- License optimization;
- Improved vendor contract management and negotiations;
- License compliance;
- Software lifecycle management;
- Improved security posture and governance;
- Budget predictability and financial management; and
- Better alignment of tools with organizational needs.

[22] Gartner, Cut Software Spending Safely With SAM, March 2016.

[23] Forrester Consulting, The Total Economic Impact™ of Snow Software Asset Management, commissioned by Snow Software, September 2021.

In the case of instructional software specifically, implementing a SAM program is a necessary first step. After that, CCSD should develop its evaluation capacity to determine which instructional software results in student achievement gains. According to the International Society for Technology in Education (ISTE) Essential Conditions, "School systems without a plan for evaluation and selection of learning materials end up wasting resources, losing focus and hindering their ability to evaluate effectiveness."[24]

Fiscal Impact

Applied conservatively to CCSD's $48.1 million General Fund software portfolio, a formal SAM program is estimated to generate $12 million in annually recurring savings through license reclamation, elimination of redundant tools, and improved vendor negotiations. This estimate assumes a 25% savings rate, below the up-to-30% savings reported in mature enterprise environments, based on industry research and adjusted conservatively to reflect CCSD's current baseline.

These savings are expected to be fully realized within three years of full program implementation. An annual SAM platform subscription will cost an estimated $200,000 to $750,000 per year. Additional Year 1 costs will include initial implementation services ($500,000), and one-time training ($8,000 to $50,000). TISS already has sufficient staffing to manage the SAM implementation and continue monitoring it. This recommendation will yield an estimated net annual savings of over $11 million once the program reaches full operational maturity.

Table 8 presents a summary of the anticipated annual General Fund cost savings over the next five years, assuming three years to fully implement the recommendation.

Table 8. Estimated Fiscal Impact, Improved Software/Licensing Monitoring, 2026-2027 to 2030-2031

Component	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031
Annual SAM Platform Subscription	($750,000)	($750,000)	($750,000)	($750,000)	($750,000)
Initial Implementation Services	($500,000)	-	-	-	-
Initial Training	($50,000)	-	-	-	-
Improve Software/ Licensing Monitoring	$2,000,000	$5,000,000	$12,000,000	$12,000,000	$12,000,000
Totals	**$700,000**	**$4,250,000**	**$11,250,000**	**$11,250,000**	**$11,250,000**

Source. Gibson Consulting Group

Implementation Strategies

Build an assessment and governance foundation.

The Chief Information Officer and Chief Financial Officer should establish a SAM Steering Committee and authorize a districtwide software inventory effort. All active software contracts, license agreements, and

[24] https://iste.org/essential-conditions-for-effective-tech-use-in-schools.

subscription renewals should be reviewed, and gaps between what is licensed and what is deployed should be documented. A SAM governance framework, including mandatory purchase approval for all software of $10,000 or more, and a required technology review prior to purchase, should be developed for Steering Committee adoption. The Steering Committee will provide ongoing oversight by approving major consolidation and renegotiation decisions, resolving cross-functional policy conflicts, and reviewing annual SAM performance and savings. This governance framework will guide platform selection, purchasing integration, and ongoing compliance oversight in subsequent phases.

Enable technology and data integration.

The district should select and deploy a SAM platform capable of automating software discovery, tracking license usage, and integrating with CCSD's procurement and network infrastructure. The Director of Purchasing should issue a competitive solicitation using a detailed specification framework. LAUSD's March 2025 FlexNet Manager Suite RFP, which addresses license inventory, usage tracking, license-to-deployment comparison, and integration with existing discovery systems, offers a strong model that can be adapted for CCSD's needs. Vendor evaluation should focus not only on technical features but also on ease of integration with CCSD's existing information systems, vendor support during implementation, and scalability as the district's software environment grows.

Following contract execution, the Chief Information Officer should deploy the SAM platform in phases, beginning with central office systems and high-spend administrative software where compliance risk and savings potential are greatest. This approach will allow the district to confirm data accuracy and build internal expertise before expanding to instructional technology and site-based applications. A SAM Platform Administrator should be designated within the TISS Division to serve as the technical owner of the system, responsible for maintaining license data, configuring discovery tools, and keeping the system aligned with district purchasing records. Resourcing for this role should be evaluated following platform selection, with consideration given to assigning a dedicated FTE based on system complexity and the volume of software assets under management.

By the conclusion of this phase, the district will have a functioning SAM platform, combined discovery and procurement data, and its first districtwide report identifying where software licenses exceed or fall short of actual need, along with an initial list of potential savings and compliance concerns.

Institutionalize operational capabilities and processes.

A SAM program is most effective when it becomes part of the district's routine procurement, budgeting, and technology decision-making processes. With Steering Committee approval, the Director of Purchasing should require a SAM review as part of the software acquisition process, ensuring that proposed purchases are reviewed against existing licenses and that new licenses are recorded in the SAM platform before contracts are executed. This ensures purchasing decisions are informed by actual usage and reduces the accumulation of unused or duplicate licenses.

The Chief Financial Officer should integrate SAM renewal information into the annual budget development cycle so that software subscriptions are reviewed each year based on actual use and operational or instructional needs rather than automatically renewed. Department directors, the SAM Platform

Administrator, and key staff in Purchasing and Finance should receive training appropriate to their roles. Department directors should receive additional training on interpreting SAM usage and compliance information for their cost centers, and TISS and procurement staff should receive additional training on license management practices and vendor contract terms.

The Chief Information Officer should establish a quarterly SAM review cycle in which updated license and usage information is shared across Information Technology, Purchasing, and Finance. These reviews provide current information that feeds into the annual budget development process and allows the district to address issues throughout the year rather than only during annual renewal decisions.

Sustain optimization and continuous improvement.

With a functioning SAM platform and regular review processes in place, the district should focus on reducing costs and eliminating unnecessary or duplicate software. The Chief Information Officer should identify unused and underused licenses and either reassign them to other users or discontinue them. Initial efforts should target high-cost enterprise software and administrative applications where savings are greatest and where reassignments can be made with minimal disruption.

Department directors, working with the Chief Information Officer, should consolidate duplicate software applications identified through SAM data. Duplication is most common in instructional technology categories such as reading, math, and assessment tools, where overlapping products may have been purchased by individual schools or departments over time. Consolidation should prioritize categories where duplication and licensing costs are highest and where instructional consistency would benefit from standardization. Decisions should be informed by usage data, educator feedback, and student outcome evidence to ensure the district retains the most effective tools. Where consolidation decisions involve districtwide instructional tools or require resolving competing departmental priorities, the Steering Committee should review and approve the consolidation plan.

The Director of Purchasing and Chief Financial Officer should use SAM data to renegotiate priority vendor contracts, using accurate usage and licensing information to eliminate unused licenses, adjust renewal terms, and secure volume discounts where supported by actual use. These efforts should begin with the district's highest-spend software vendors and be informed by pricing and contract information from comparable districts.

Building on the savings opportunities identified earlier, the Chief Financial Officer should calculate and report first-year savings to the SAM Steering Committee for review and approval of next-phase optimization priorities, and should track total savings and avoided costs over time. Annual reporting to the Board of School Trustees should include SAM savings, compliance status, and progress on license consolidation.

As the SAM program develops, CCSD should add an annual review process for instructional software to assess whether products are being used as intended, whether student outcomes meet expectations, and whether continued investment is justified. Connecting software usage and cost information with instructional results supports informed decisions about renewals and ensures technology spending supports student success.

6 Reduce unnecessary transportation routes and related costs.

Background and Context

The CCSD Transportation Department is responsible for home-to-school transportation for general education and special needs students attending public schools, including schools providing CTE. The department is also responsible for student transportation for summer programs, school activities, educational field trips, athletics, and extracurricular activity trips for all schools. Additionally, the Transportation Department is responsible for vehicle maintenance for the district's fleet of school buses and general services vehicles.

Based on the data CCSD annually reports to the NDE, while overall enrollment has decreased since 2021-2022, the number of students eligible for bus transportation to and from school has increased by 7% (Table 9).

Table 9. Transportation Statistics, 2021-2022 to 2024-2025

School Year	Total Enrollment	# of Bus-Eligible Students	# of Daily Routes	Annual Total Route Mileage	# Eligible Students/ Route	# of Miles/ Eligible Student
2021-2022	309,502	116,257	1,401	N/A	83.0	177
2022-2023	314,372	132,200	1,211	N/A	109.2	161
2023-2024	291,787	134,055	1,258	32,649,685	106.6	244
2024-2025	296,145	123,967	1,291	30,942,327	96.0	250
Change	-4%	7%	-8%	N/A	16%	41%

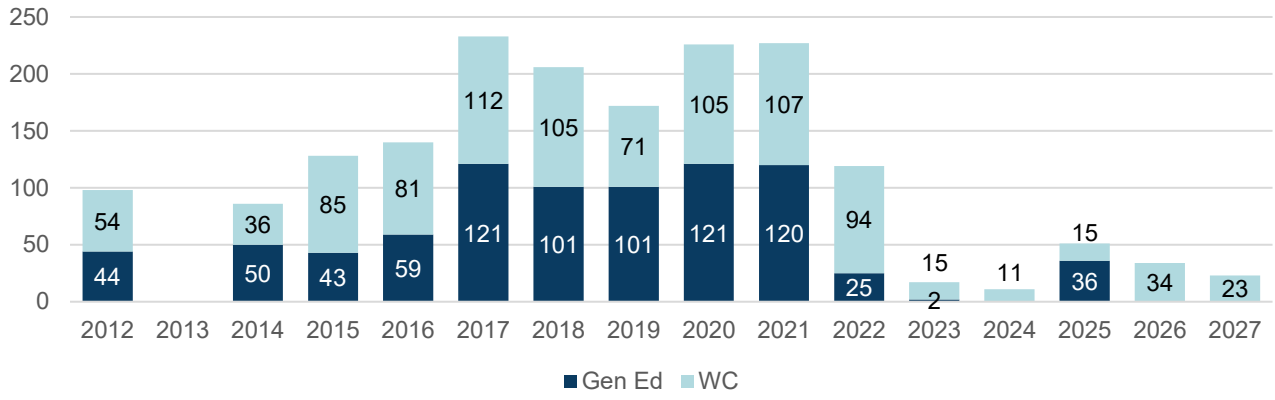
Note. The district's approach to collecting mileage data changed from 2022-2023 to 2023-2024. The older figures were based on mileage data reported by drivers when refueling. The more recent figures came from the district's GPS systems and represent more accurate information. Accordingly, a percent change calculation is not applicable for this data.

Source. CCSD Annual Reports to the NDE

The Transportation Department has a school bus fleet of 1,775 buses.[25] The current schedule for replacing standard school buses is every 14 years. Figure 18 presents the number of buses, by model year of purchase, for general education and special education wheelchair-accessible buses.

[25] This figure was obtained from the district's vehicle maintenance management system in order to reflect the number of route and spare buses able to operate. Other district fleet figures include buses such as those awaiting disposal.

Figure 18. Bus Inventory by Model Year of Purchase, General Education and Special Education, 2012 to 2027



Note. 'Gen Ed' is general education. 'WC' is wheelchair-accessible.

Source. CCSD Transportation Department Vehicle Maintenance Management System

The district operates a bus fleet with a variety of capacities. All of the 945 buses used for special education runs are "lift" buses so they can transport students in wheelchairs, and all but 44 of them have a manufacturer-rated capacity range of 46 to 54 students. All but eight of the 830 buses used for general education runs have a manufacturer-rated capacity range of 72 to 84 students. In practice, manufacturer ratings represent a maximum number of elementary students that can be boarded at once; the capacity for middle and high school students is lower.

To support the bus fleet, the Transportation Department has five primary facilities located within the City of Las Vegas and six outlying facilities/bus parking areas in more rural areas of the county. The five primary facilities provide bus maintenance and repair services.

The Transportation Department uses a variety of technologies to manage and improve operations. It is in the process of switching from a discontinued routing software system to a new one, with the transition beginning in Summer 2025 and expected to be completed by the end of the 2025-2026 school year. The Transportation Department has GPS tracking software on each bus to monitor operations. All bus drivers have tablets on which they can receive CCSD emails.

Total Transportation Department expenditures were $181 million in 2024-2025. All categories of transportation expenditures—administration, vehicle maintenance, and operations—have increased since 2018-2019. However, the overall departmental increase of 46% in that time period was lower than the 67% overall district increase (Table 10).

Table 10. Transportation Expenditures, 2018-2019 to 2024-2025

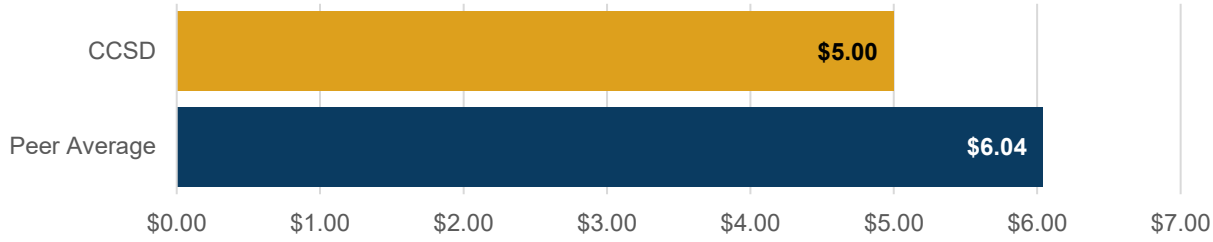
School Year	Transportation Administration	Vehicle Maintenance	Transportation Operations	Total
2018-2019	$7,123,479	$25,694,780	$91,170,399	$123,988,658
2019-2020	$8,032,601	$22,113,415	$91,613,474	$121,759,490

School Year	Transportation Administration	Vehicle Maintenance	Transportation Operations	Total
2020-2021	$8,950,988	$18,153,305	$83,232,997	$110,337,291
2021-2022	$14,264,967	$27,825,059	$87,693,864	$129,783,890
2022-2023	$10,682,789	$30,992,386	$95,916,364	$137,591,539
2023-2024	$9,342,099	$33,181,004	$114,918,224	$157,441,328
2024-2025	$10,270,391	$33,298,054	$137,586,455	$181,154,900
Change	44%	30%	51%	46%

Source. CCSD Expenditure Data

On a cost per mile basis, CCSD transportation services compare favorably to its peers based on the most recent CGCS data available. Figure 19Figure 19 compares CCSD's transportation cost per mile to the peer average. CCSD's cost per mile of $5.00 is 17.2% below the peer average.

Figure 19. Transportation Cost per Mile, 2022-2023



Source. CGCS benchmark data for 2022-2023

The manner in which a district provides students with bus transportation depends on a number of routing factors, which are described below.

- District regulations on non-transportation zones – Per CCSD Regulation R-3531, the Transportation Department transports students who live more than two miles from their assigned schools, unless there is a walking hazard. This distance is more supportive of efficient routing than smaller zones observed in other districts, as a substantial portion of a neighborhood school's enrollment is not eligible for CCSD bus transportation.
- Designated pickup stops – CCSD routing benefits from long-standing practices, including group pickup points established at intersections according to traffic conditions in the area, and restrictions on general education buses entering gated communities.
- Bus capacities – A bus capacity guideline traditionally establishes what the district considers to be a full bus. A common misconception is that the manufacturer's rated bus capacity can be considered an expectation of actual capacity. The CCSD routing team informally uses the following goals:
  - 50-55 students per high school bus;

- 65-70 students per middle school bus; and
- 70-80 students per elementary bus.

The CCSD Transportation Department faces a common K-12 scenario: more students are eligible for transportation than typically ride. The annual CCSD bus ridership report to the NDE does not reflect actual student ridership, but rather the number of eligible riders as required by NDE guidance. However, this is not the number of students actually riding CCSD buses. The number of actual bus riders is substantially smaller. Eligible students generally ride the bus at a rate of about 50% nationwide. This percentage varies across and within districts. CCSD collects actual ridership data from drivers' reports (on paper) each month, but these data are not compiled, analyzed by the Transportation Department, or used to support routing decisions. In interviews, some district staff stated the driver-reported counts were used in adjusting routes in the past, but that the practice had ceased in recent years.

Assessment

General Education Bus Routing

To evaluate the impact of CCSD's routing approach, the consulting team requested one day of ridership data from each of the five bus yards and performed a series of analyses. Of the 199 runs analyzed, 73% were general education runs and 27% were special education runs. Among those 199 runs, the consulting team made several observations, presented in Table 11.

Table 11. Analysis Results – CCSD Ridership Logs

Metric	Gen Ed	Special Education	Average
Used fewer than half of the available seats (based on the capacities set in EZRouting)	37%	61%	39%
Served five or fewer students	9%	35%	16%
Served no students	1%	2%	1%
Included one or more stops where the driver reported picking up no students	22%	50%	30%

Source. Compiled by the consulting team from CCSD hardcopy data, February 2026

In order to bridge the gap between bus eligibility and bus ridership, the CCSD routing team engages in overbooking its buses. Since the routers are not using actual ridership data to help determine an appropriate level of overbooking, the overbooking process relies on routers being familiar with the areas and schools for which they route to determine a safe level of overbooking. When routers are less familiar with an area, they are more conservative about overbooking, leading to seat use being more efficient at some schools than others. As a result, some buses can operate with a substantial number of empty seats each day.

Among the 199 runs sampled, buses at three of the bus yards are generally overbooked across the sample, accounting for the fact that not every eligible rider will ride the bus. However, buses at the other two bus

yards have more seats available than students assigned to these routes, indicating that no overbooking is occurring.

Table 12 presents the ridership results from the sample. The routes out of the Arville yard are closest to the seat capacity set in EZRouting, at 61% seat usage. Northwest routes in the sample have the lowest seat usage, at 47%. On average, 56% of the available seats were being used. Extrapolating from these data would indicate that no more than half of the eligible CCSD bus riders are riding the bus on a given day, which aligns with national trends.

Table 12. Sample of Actual CCSD Ridership, December 2025 to January 2026

Bus Yard	# of Runs Included	Total Bus Capacity	Students Assigned	Total Recorded Riders	Actual Seat Usage
Arville	40	1,676	2,599	1,018	61%
Cheyenne	41	1,895	1,689	1,141	60%
Northwest	40	1,773	1,569	837	47%
Russell	40	1,808	1,941	1,052	58%
Wallace	38	1,670	2,048	887	53%
Total	**199**	**8,822**	**9,846**	**4,935**	**56%**

Source. Compiled by the consulting team from CCSD hardcopy data, February 2026

These data also align with the following observations the consulting team made during school site visits.

- In 11 buses observed at one middle school, an average of 18.5 students disembarked in the morning (203 students total). The range of student counts was two to 43. According to data in the routing system, 353 students are assigned to the buses, which have a stated collective capacity of 402. Thus, on average, the buses were 50% full (range of 10% to 78%).
- In 17 buses observed at one middle school, an average of 12.7 students disembarked in the morning (216 students total). The range of student counts was one to 43. According to data in the routing system, 463 students are assigned to the buses, which have a stated collective capacity of 578. Thus, on average, the buses were 31% full (range of 8% to 78%).
- In 32 buses observed at one high school, the consulting team was able to count the number of students disembarking in the morning on 15 buses (279 students total). Two of the observed buses for which student counts were not made were picking up students for a magnet school. Of the 14 buses dropping off students for this high school, an average of 18.6 students disembarked. The range of student counts was one to 54. According to data in the routing system, 825 students are assigned to the 15 buses, which have a stated collective capacity of 523. On average, the buses were 53% full (range of 8% to 98%). This is despite the buses already being overbooked by approximately 300 riders.

Some school districts try to bridge the gap between eligible and actual riders by offering families the opportunity to either “opt in” or “opt out” of transportation. In the absence of this information, CCSD must plan a ride for every eligible student. Offering families the ability to opt out of transportation will permit the

CCSD routing team to develop more efficient routes by providing a list of students who are eligible for transportation but do not plan to ride. OCPS, a Florida school district serving more than 200,000 students, began an opt-in process in 2024-2025, asking families to register for bus transportation if they were eligible and planning to use it. As it was the first year, OCPS did not remove transportation for eligible riders if their families made no response. As a result of the implementation of that process, 6.4% of responding families eligible for bus transportation opted out of it and were removed from routes during the route planning phase.

Special Education Bus Routing

The determination of whether a student is assigned to special transportation is typically determined by a district's Special Education Department. During the assessment and evaluation of a student's needs, the IEP team determines whether a SWD requires general education or specialized transportation. Specialized transportation is defined as a "related service" in an IEP and one that is specifically designed for, and provided to, a student with a specific need for it. To the maximum extent appropriate, transportation for students with IEPs should follow special education guidelines of LRE. CCSD currently assigns approximately 11,000 students identified as "special education" in the electronic communications between the student information system and the routing system to a special education bus, representing approximately 22% of all SWD. The routing system is also receiving electronic notifications of subgroups of students within that total who are noted as "IEP" (450 students) or "504" (170 students), but these data are not factored into routing decisions.

The Transportation Department recognized a need for change in how it assigned SWD to buses as early as 2010-2011. In that year, the district conducted a pilot program to move SWD to the LRE in busing and, with a group of 200 students, found that 80% were successful in riding a general education bus. Based on interviews with Transportation Department staff, the pilot program was never expanded. Given that CCSD special education buses are typically considered "full" with 10-13 students (reflecting an internal procedure of placing one student per seat), any unnecessary placement of a student on a special education route adversely affects routing efficiency.

Bus Fleet Composition

For the 2025-2026 school year, the Transportation Department operates 1,775 buses (including spares) to provide 1,501 daily (morning and afternoon) routes. Of this total, the district's vehicle maintenance system notes that 945 buses have the lift equipment necessary to transport students needing wheelchair access. As of February 25, 2026, CCSD was transporting 372 students needing such access. Given that each wheelchair-accessible bus can accommodate two to four students, and that all buses are parked at lots that are easily accessible by substitute drivers, CCSD has more wheelchair-accessible buses than it needs. The routing system lists a total of 2,325 wheelchair-accessible positions available on the 763 wheelchair-accessible buses it lists as active. This yields an available 6.25 active wheelchair-accessible positions for every current student needing wheelchair access. Every unused wheelchair position on a bus reduces the capacity of that bus to carry several ambulatory students. CCSD has typically left wheelchair positions empty rather than fitting standard seats back in. This reduces the useful capacity of each wheelchair-accessible bus.

Using the manufacturer specifications for seating capacity, for each wheelchair-accessible bus it buys, the district gains the ability to have two to four wheelchair-accessible positions but loses the ability to transport 31 ambulatory students (Table 13). In practice, the loss of seats is greater. In general, the district sets the capacity of its general education buses at 55 students and seats one student per seat in each wheelchair-accessible bus. With 10-13 bench seats per wheelchair-accessible bus, CCSD has an effective planning capacity of no more than 13 students per wheelchair-accessible bus.

Table 13. Seating Capacity by Bus Class, 2025-2026

Bus Class	# Buses	# Student Seats	Average Seats per Bus	# Student Seats	Average Seats per Bus
		Manufacturer Specifications		Predominant CCSD Planning Capacity[26]	
General Education	830	69,468	84	45,650	55
Wheelchair-Accessible	945	49,638[27]	53	12,285	13
Loss of Seats	N/A	19,830	31	33,365	42

Source. CCSD Transportation Department

Fiscal Impact

CCSD is currently using more routes and runs than are necessary to get bus-riding students to and from school, which is contributing to a larger bus fleet and increased driver and maintenance costs. In addition, the district has over-invested in special education buses, which hold fewer students, contributing to a larger bus fleet than necessary. Through improved routing and a streamlined bus fleet, CCSD should be able to reduce general education runs by approximately 10% and special education runs by 25% without adversely affecting student service or compliance.

The estimated fiscal impact is based on the following operating statistics. In the routing system, the district currently operates 1,501 routes using a fleet of 1,775 buses (which includes spares). Of the 1,501 routes, 802 are primarily all general education routes and 699 are primarily all special education routes. A 10% and 25% reduction, respectively, would yield a reduction from 802 to 722 general education routes and from 699 to 524 special education routes (a total reduction of 255 routes). Following the 14-year replacement cycle, the elimination of these routes reduces annual bus purchases by 21 (assuming the maintenance of a 15% spare ratio). As CCSD primarily purchases buses using capital funds, these savings would not accrue to the General Fund. However, each bus in the fleet requires approximately $6,500 in annual maintenance costs. There would also be a reduction in fuel costs, but these cannot be reasonably estimated at this time.

[26] Average capacity of buses of each type as noted in the new CCSD routing system.

[27] Manufacturer's capacity of the fleet without consideration of the lift and before removal of seats to accommodate wheelchair tiedowns.

The fiscal impact does not assume eliminating all bus driver positions associated with the route reductions. Reducing the number of active daily routes will create a more stable pool of available substitute drivers. Yard-based Transportation Department staff members indicated during interviews that driver absences are frequently as high as 20%. The fiscal impact also does not assume any reduction in bus mechanics. There is currently a shortage of authorized bus mechanic positions, and the district should strive to achieve a best practice staffing ratio of one bus mechanic per 24-26 buses.

Table 14 presents a summary of the anticipated annual General Fund cost savings over the next five years, assuming three years to fully implement the recommendation.

Table 14. Estimated Fiscal Impact, Transportation Routing and Bus Purchase Improvements, 2026-2027 to 2030-2031

Component	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031
Reduce General Education Routes by 10% (802 to 722)					
Reduced Bus Driver Positions	$2,458,405	$3,687,607	$4,916,810	$4,916,810	$4,916,810
Reduced Bus Maintenance	$261,880	$392,820	$523,760	$523,760	$523,760
Reduced Spare Bus Maintenance	$39,282	$58,923	$78,564	$78,564	$78,564
Reduce Special Education Routes by 25% (699 to 524)					
Reduced Bus Driver Positions	$5,600,158	$7,466,878	$11,200,317	$11,200,317	$11,200,317
Reduced Bus Maintenance	$572,863	$763,817	$1,145,725	$1,145,725	$1,145,725
Reduced Spare Bus Maintenance	$85,111	$113,481	$170,222	$170,222	$170,222
Totals	**$9,017,699**	**$12,483,526**	**$18,035,398**	**$18,035,398**	**$18,035,398**
Totals (Rounded)	**$9,000,000**	**$12,500,000**	**$18,000,000**	**$18,000,000**	**$18,000,000**

Source. Gibson Consulting Group

Implementation Strategies

Implement a parent opt-in program.

CCSD should implement an “opt-in” program whereby parents indicate whether their child will or will not ride the bus. This information can by used to support more efficient routing, and reduce or eliminate the need for overbooking routes.

Reinstate pilot project to evaluate LRE.

CCSD should reinstate the pilot project conducted in 2010-2011 to evaluate the possibility of transitioning more SWD to a less restrictive transportation experience. If prior results are realized, the Special Education Department and the Transportation Department may be able to better support LRE and routing efficiency through placement of SWD on general education routes. In some instances, transportation as a related service in a student’s IEP may require a home stop that could be provided on what is currently a CCSD general education route.

Improve routing process.

With its new routing system, combined with the implementation of this recommendation, CCSD will have more opportunities to improve its routing efficiency. The Transportation Department should track routing statistics to evaluate and report the impact of routing efficiencies.

Streamline bus fleet.

Assuming a 25% special education routing reduction, the district will still have more than enough wheelchair-accessible buses to meet student needs, even after accounting for spare buses. Replacing those buses with general education buses that have more capacity for either general education or special education transport at a rate less than one-for-one would allow the district to further reduce its overall fleet. This would yield further maintenance and driver General Fund savings, in addition to capital fund savings.

7 Implement a structured facilities preventive maintenance program to reduce overall maintenance costs.

Background and Context

Facility maintenance is generally characterized as preventive maintenance or reactive maintenance. Preventive maintenance is prescribed by a written schedule based on the specific needs of every building component. Reactive maintenance represents all types of maintenance activities undertaken in response to unexpected building component/equipment failures or breakdowns.

The Association of Physical Plant Administrators (APPA): Leadership in Educational Facilities defines four levels of building maintenance standards, based on the documented ratio between preventive maintenance and corrective maintenance activities (Table 15). At the highest level, Showpiece, all maintenance activities are preventive maintenance activities. At the lowest level, Reactive Management, less than half of maintenance activities fall into the preventive maintenance category.

Table 15. APPA Maintenance Standards

Description	Level 1 Showpiece	Level 2 Comprehensive Stewardship	Level 3 Managed Care	Level 4 Reactive Management
Preventive maintenance vs. Corrective Maintenance	100%	75-100%	50-75%	25-50%
Building Systems Reliability	Breakdown maintenance is rare and limited to vandalism and abuse repairs	Breakdown maintenance is limited to system components short of MTBF	Building and systems components periodically or often fail	Systems unreliable. Constant need for repair. Backlog repair exceeds resources

Note. MTBF stands for mean time between failures.

Source. APPA's Levels of Service: Establishing Standards

Assessment

CCSD leadership has been aware of the need for greater focus on preventive maintenance for some time. In its five-year strategic plan, FOCUS: 2024, the district set an objective to "attain and maintain proper levels of maintenance department levels of service as defined by the APPA." As of the publication of the plan in March 2019, CCSD defined its current APPA level in this area as being 3.75 – Reactive Management. The district hoped to move to 2.0 – Comprehensive Stewardship by January 2024.

Maintenance Staff are Geographically Dispersed

Although CCSD is the nation's fifth-largest school district based on student enrollment, it has the largest land area by far. Its land area is 5,600 square miles larger than the Miami-Dade County Public Schools (FL) district, which has the second largest land area. The expanse of CCSD land area contributes to higher maintenance expenditures, as maintenance staff travels to and from school sites. In 2011, the district deployed a four-quadrant organizational model to reduce the time Technicians spend driving to work sites. Maintenance staff are allocated to each quadrant, reducing travel time.

The district is currently exploring strategies to improve how they centrally manage the regions and the dispersed maintenance staff. There is a current district initiative to connect all the heating, ventilation, and air conditioning (HVAC) technical trades under a single management umbrella. Currently, the CCSD technicians for chillers, boilers, direct expansion HVAC systems, and controls/energy management are managed separately.

Data Documenting Preventive Maintenance Activities are Lacking

Facilities maintenance and repair operations in CCSD are predominantly in a reactive mode. CCSD does not track its complete asset inventory (e.g., air handling units and rooftop units are not inventoried) in its Computerized Maintenance Management System (CMMS), and codes are applied to categorize work orders by type, preventive maintenance or otherwise. Further, some preventive maintenance activities are assigned, but their completion is not tracked. In practice, some preventive maintenance activities are performed during reactive maintenance activities. The combination of these factors limits the ability of management to determine the level and effectiveness of preventive maintenance at CCSD.

In a limited set of onsite observations at 11 CCSD schools, the consulting team found one school where the administrator indicated that preventive maintenance teams are not regularly deployed at the school. (The consulting team did find four schools that indicated some form of preventive maintenance teams are deployed.)

From 2022-2023 to 2023-2024, the CCSD budget for repairs/maintenance increased from $11.3 million to $21.3 million. According to staff, the $10 million increase was allocated to address preventive maintenance needs as part of the CCSD sustainability initiative. However, this work was not tracked as preventive maintenance in the CMMS. While this funding has been sustained, there has been no effort since then to formally address or track preventive maintenance.

Constituent Surveys Indicate General Satisfaction with Facilities Maintenance

The district collects customer satisfaction with facilities maintenance quality through districtwide annual surveys of staff and students. Table 16 presents survey results relating to facilities service quality from 2020-2021 to 2025-2026. During this time, staff satisfaction was consistently above 80% and has improved each year over the past four years. Student responses (Table 17) were consistent with staff with respect to equipment and facilities functionality, and showed marked improvement in satisfaction in heating and cooling system functionality during this time period.

Table 16. Staff Survey Results Regarding Facilities, 2020-2021 to 2025-2026

	Percent Agreement With Statement					
Survey Statement	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026
The school building is clean and well maintained.	84.6%	92.2%	83.2%	83.7%	84.6%	88.1%
The equipment and facilities at this school work well.	80.8%	87.5%	82.5%	82.1%	82.6%	85.0%

Source. CCSD staff surveys

Table 17. Student Survey Results Regarding Facilities, 2020-2021 to 2025-2026

	Percent Agreement With Statement					
Survey Statement	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026
The heating and air conditioning work well at this school.	68.1%	Not asked	73.9%	72.6%	83.6%	84.7%
The equipment and facilities at this school work well.	83.1%	89.6%	86.0%	85.9%	79.8%	81.4%

Source. CCSD student surveys

Having a preventive maintenance program in place has been documented to improve constituent satisfaction. In a comprehensive white paper about schools performing preventive maintenance, top-performing districts saw reductions in emergency maintenance and overall work order costs, as expected. They also noted improvements in constituent satisfaction and perceptions of being able to work better in a well-maintained environment, resulting in a positive effect on learning and achievement.

Peer Data Confirm the Gap — and the Opportunity

As CCSD staff indicated that some preventive maintenance activities are undertaken while they are completing routine maintenance items, routine maintenance costs may be higher than desired. Data from the CGCS Managing for Results 2024 report shows CCSD's cost of routine maintenance per square foot and per work order (Table 18) to be in the highest quartiles. Both CCSD routine maintenance metrics are

increasing at rates higher than CGCS districts in the highest quartile. They are also outside the range of the 10 best schools in the nation, as reported by the CGCS.

Table 18. Facilities Routine Maintenance Benchmarks

Year	CCSD	CGCS		
		Lower Quartile	Median	Upper Quartile
Routine Maintenance: Cost per Square Foot				
2020-2021	$1.14	$0.93	$1.26	$1.51
2021-2022	$1.55	$1.09	$1.31	$1.66
2022-2023	$1.73	$1.02	$1.35	$1.74
Percent Change	**52%**	**10%**	**7%**	**15%**
Routine Maintenance: Cost per Work Order				
2020-2021	$541	$452	$526	$724
2021-2022	$611	$386	$496	$666
2022-2023	$751	$428	$538	$791
Percent Change	**39%**	**-5%**	**2%**	**9%**

Source. CGCS Managing for Results in America's Great City Schools 2024

A lack of preventive maintenance more clearly shows in major maintenance costs. The district's major maintenance cost per student is well above the CGCS figures for the upper quartile (Table 19). Moreover, CCSD's major maintenance costs per student increased by 26% over the three-year time period, while it declined by 55% among the CGCS districts in the upper quartile.

Table 19. Facilities Major Maintenance Benchmarks

Year	CCSD	CGCS		
		Lower Quartile	Median	Upper Quartile
Major Maintenance: Cost per Student				
2020-2021	$294	$46	$120	$300
2021-2022	$279	$38	$64	$151
2022-2023	$370	$38	$55	$135
Percent Change	**26%**	**-17%**	**-54%**	**-55%**

Source. CGCS Managing for Results in America's Great City Schools 2024

Fiscal Impact

The district's current approach to facilities maintenance has led to the district responding to maintenance work in a predominantly reactive mode. Continued over-reliance on reactive maintenance contributes to higher maintenance costs. Reactive maintenance is universally accepted as more expensive than a more dominant reliance on structured preventive maintenance protocols. It also increases the risk of equipment breakdowns and failures. Industry data indicate that, for every $1 spent on preventive maintenance, the organization typically sees at least $10 in savings from avoided downtime, larger breakdowns, and repairs. Industry data indicate that the cost of allowing building equipment and components to default to failure mode can exceed 15 times the cost of what preventive maintenance would have incurred.[28]

Some of the industry rules of thumb often used to determine an appropriate spend on preventive maintenance include:

- Cost per Square Foot: One industry analysis determined that a comprehensive preventive maintenance program can cost approximately $0.33 per square foot;
- Percentage of Facility Value: Budget 2% to 5% of the total Replacement Asset Value (RAV) per year on preventive maintenance activities;
- Total R&M Spend: Preventive maintenance should constitute 30% to 50% of the total Repair and Maintenance (R&M) budget, which itself often accounts for 15% percent of total operating expenses; and
- ROI: For every $1 spent on preventive maintenance, owners can see up to $10 in savings from avoided downtime and repairs.

Based on the above industry guidance, a regular, sustained allocation of $2 million for a structured and documented preventive maintenance program should achieve an annual ROI of $20 million in reduced reactive/emergency maintenance work. A portion of existing staff could be reassigned to focus exclusively on preventive maintenance activities. Alternatively, CCSD could shift a portion of its expenditures from outside contractors who perform various maintenance activities (including some preventive maintenance activities) to newly created, dedicated preventive maintenance positions. Either option should be cost neutral.

Table 20 presents a summary of the anticipated annual General Fund cost savings over the next five years, assuming full implementation by the second year.

Table 20. Estimated Fiscal Impact, Preventive Maintenance Programming, 2026-2027 to 2030-2031

Component	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031
Implement a Preventive Maintenance program	$10,000,000	$20,000,000	$20,000,000	$20,000,000	$20,000,000

Source. Gibson Consulting Group

[28] https://www.cryotos.com/glossary/deferred-maintenance.

Implementation Strategies

The district's current shift to centralize the management and training of all mechanical technicians is an initial first step in shifting from primarily reactive maintenance to preventive maintenance. Using the district's current established preventive maintenance activities schedule, there are several key implementation considerations:

Develop skills training and certification for preventive maintenance teams.

As the switch from reactive maintenance to preventive maintenance begins, preventive maintenance teams should be formed gradually. Initial teams should be in the major areas of Mechanical, Electrical, and Plumbing, and they should join the existing maintenance technician(s) in the safety area. Preventive maintenance teams are assembled best with a skilled leader from the existing maintenance staff, but with newly hired maintenance technicians as team members. The leader should be charged with training the new members in their specific preventive maintenance tasks and routines. A qualification and certification program should be established to measure skills achievement through written exams and practical skills demonstration to provide feedback on training effectiveness. As older maintenance technicians retire, they should be replaced with entry-level staff in their specific trade who are intended to be the new preventive maintenance team trainees.

Document preventive maintenance procedures.

Preventive maintenance procedures should be developed by the assembled preventive maintenance teams. They should consist initially of basic preventive maintenance work orders specifying in detail the adjustments, fine-tuning, replacement, cleaning, tightening, stiffening, and other actions required to keep machinery, equipment, and infrastructure in proper working order. These basic preventive maintenance work orders should then be scheduled appropriately throughout the year. Some will suffice if scheduled annually, while others may be needed semi-annually, quarterly, or monthly. Some inspections, such as toilets and locker rooms, may be needed even more frequently. Once the basic preventive maintenance protocols have been codified as work orders, the number of preventive maintenance work orders should be expanded further to include higher levels of preventive maintenance, such as proactive replacements, scheduled rebuilds or overhauls, predictive maintenance and condition monitoring, and performance-based maintenance.

Establish dedicated regional preventive maintenance teams for HVAC systems.

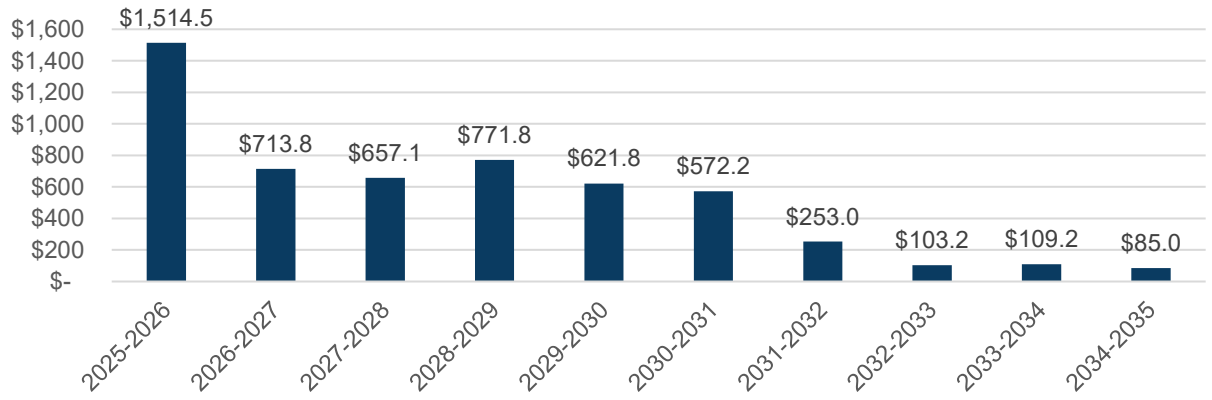
CCSD should identify current skilled trades assistants (STAs) who are best suited for structured, repetitive preventive maintenance work. These STAs would be led by skilled trades personnel to complete the preventive maintenance activities, and the trades personnel would be led by knowledgeable trade leads. Current trades supervisors of integrated trades would be assigned as preventive maintenance leaders. It is important that the supervisors of integrated trades have practical experience with the HVAC systems that the preventive maintenance team would maintain.

8 Update the Construction Design Manual to achieve enhanced operational cost savings.

Background and Context

The CCSD Construction Management Department is responsible for managing the planning, design, and construction phases of all CCSD's projects. CCSD is executing one of the largest Capital Improvement Programs (CIPs) in K-12 education through its 2015 Bond program. The 2015 CIP Schedule outlines multi-year investments of $7.7 billion for 2025-2026 through 2034-2035, including $5.4 billion already earmarked for identified new schools, replacements, modernizations, and repairs. As shown in Figure 20, annual CIP expenditures are $1.54 billion in 2025-2026, then decline in phases over the subsequent nine years. The CIP schedule includes major allocations for elementary/middle/high school replacements, comprehensive modernizations, and new facilities.

Figure 20. CCSD CIP Expenditures (in $ Millions), 2025-2026 to 2034-2035



Source. CCSD 2015 Capital Improvement Program, Revision 6 Schedule

Assessment

The district's Design Manual, to be used in designing and constructing CCSD facilities, has not been updated since 2016 but is in the process of being updated by staff. The current version generally lacks requirements to follow several procedures that frequently reduce the overall lifecycle cost of a building, and which are typically common practice for larger school districts. The Design Manual does not reference or require the use of techniques such as value engineering, post-occupancy evaluation, or life cycle costing. These are discussed further below.

Value Engineering

Value Engineering is a structured, team-based process that identifies lower-cost ways to deliver the same or better building performance, quality, and functionality without cutting scope or compromising safety.[29] Changes made early in design cost pennies instead of dollars. Value Engineering can be applied throughout

[29] ASTM E1699-14 (Reapproved 2020).

the project but provides net savings when applied in the planning and analysis, schematic design, design development, and working drawings stages. It provides more limited savings when applied in the construction documents stage.

District staff noted that some Value Engineering had been done in recent projects, but generally at points considered too late in the process to reduce project costs. Industry data indicate that incorporating Value Engineering into initial project stages provides CIP savings in the range of 4% to 8%.

Life Cycle Costing

Life Cycle Costing is a method for assessing the total cost of facility ownership, from initial build through asset disposal. It is also sometimes referred to as the Total Cost of Ownership. At the site selection stage, Life Cycle Costing can include the orientation of the building relative to the sun's path. Life Cycle Costing also includes the more obvious decisions about which finishes are most likely to stand up to student use and which are the least expensive to clean and maintain. The selection of building materials; interior finishes; hardware; mechanical, electrical, and plumbing systems; and other major building components made according to Life Cycle Costing results in an optimum total cost of construction, operations, and maintenance. The lowest initial cost of building material, finish, or component is not always the most advantageous selection. Life Cycle Costing helps ensure that the best selections are made.

District staff stated that they are not currently applying Life Cycle Costing, but Industry data indicate potential savings from its use, including:

- Per major system/component: 5% to 15% over the life of the system/component; and
- HVAC and building enclosure: 10% to 20% energy, operations, and maintenance cost reductions over the life of the system/building component.

By using Life Cycle Costing instead of "lowest-first" design costs, an overall reduction in annual building operations and maintenance expenditures of 10% to 15% can be expected over the life of the facilities and components.

Post-Occupancy Evaluation

Post-Occupancy Evaluation is a systematic, evidence-based process conducted six to 18 months after a new or modernized school opens. It measures how well the building actually performs compared to the original design goals using occupant surveys, energy metering, indoor environmental monitoring, maintenance logs, and on-site walkthroughs. The lessons learned are then applied to subsequent district projects, supporting a continuous improvement process.

District staff noted that they are not currently completing Post-Occupancy Evaluations. The lack of Post-Occupancy Evaluations of all new construction and renovations undermines the effectiveness of the maintenance and custodial staff and the efficiency of the district's energy management/conservation protocols. It also likely increases CCSD annual operations and maintenance costs. Industry benchmarks from multiple sources, including studies in several large districts (including in LAUSD), show Post-Occupancy Evaluations consistently reduce annual operations and maintenance costs by 10% to 20%.

Fiscal Impact

Industry benchmarks from large school districts show that Value Engineering, Life Cycle Costing, and Post-Occupancy Evaluation can deliver construction savings plus substantial operations and maintenance cost reductions. Value Engineering is likely to primarily deliver quantifiable savings in capital bond funds, which is not the central focus of this study. Nevertheless, Value Engineering can contribute to General Fund savings indirectly by reducing later operations and maintenance costs. Both Life Cycle Costing and Post-Occupancy Evaluation can deliver savings to the General Fund, which is the central focus of this study. By updating the Design Manual to include these new required procedures, CCSD could reasonably expect net recurring General Fund savings of approximately $10 million annually.

Table 21 presents a summary of the anticipated annual General Fund cost savings over the next five years. The consulting team has estimated initially smaller General Fund savings for the next two years as CCSD learns to effectively implement Value Engineering, Life Cycle Costing, and Post-Occupancy Evaluation strategies. Annual savings in later years should be higher.

Table 21. Estimated Fiscal Impact, Updated Construction Design Manual, 2026-2027 to 2030-2031

Component	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031
Update the Design Manual	$4,000,000	$8,000,000	$10,000,000	$10,000,000	$10,000,000

Source. Gibson Consulting Group

Implementation Strategies

Start with projects in early stages of design.

Value Engineering, Life Cycle Costing, and Post-Occupancy Evaluation could most easily be implemented on projects where design has not started or could be included by amendments for projects in the early programming phase.

Outline requirements and expectations.

To update the Design Manual, the district should draft a scope document that outlines requirements of Value Engineering, Life Cycle Costing, and Post-Occupancy Evaluation. Outside assistance may be needed. Once developed, CCSD should pilot the updated manual on 2027-2028 projects. To assess success, district staff should track multiple key performance indicators, including contingency utilization percentage, Value Engineering savings captured, Post-Occupancy Evaluation completion rate, energy monitoring, and occupant complaints.

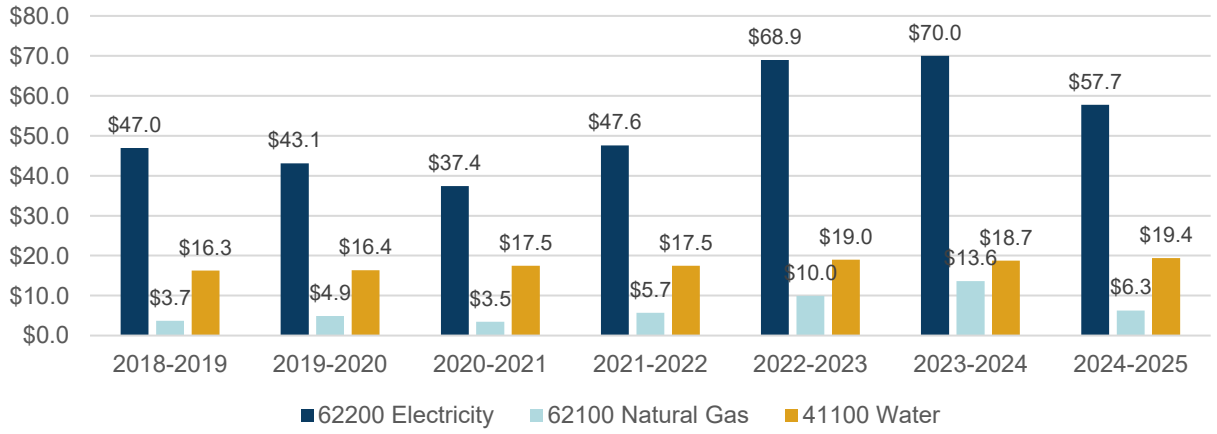
9 Reduce energy consumption through performance benchmarking.

Background and Context

As described in district documentation, CCSD energy management efforts have "historically focused on operational reliability, regulatory compliance, occupant comfort, and site-specific optimization rather than standardized performance targets across all facilities." The lack of focus on potential efficiency gains represents a substantial missed opportunity to minimize energy usage and save General Funds to the greatest extent possible (recognizing that utility rates tend to increase over time). The district collects utility data; however, it engages in no systematic benchmarking of energy or utility use at the individual facility level. Facilities are not tracked against baselines, peers, or goals, leading to undetected inefficiencies, rising costs, and likely missed savings. Without benchmarking, the district cannot identify high-consumption outliers, set reduction targets, or verify improvements from energy-saving initiatives or sustainability projects. It is possible that current energy consumption is already substantially minimized, but in the absence of facility-level benchmarking, there is no data to support that assumption.

In 2024-2025, CCSD incurred $83.4 million in electricity, natural gas, and water expenditures. With the exception of 2019-2020 and 2020-2021 (years where federal funds provided COVID-19 pandemic relief), more than 99% of these utility expenditures were incurred by the General Fund over the past seven years. Figure 21 presents CCSD utility expenditures supported by all funds from 2018-2019 to 2024-2025. In that time period, CCSD constructed 12 new schools and completed 38 school expansions, increasing the total square footage consuming energy. It also replaced 24 schools, ostensibly modernizing building systems that likely lowered energy consumption in comparison to the replaced buildings. As overall district square footage increased in this time period, some increase in utilities usage was expected, but the lack of benchmarking prevented the determination of how much was unavoidable and how much was energy overuse.

Figure 21. CCSD Utilities Expenditures (in $ Millions), All Funds, 2018-2019 to 2024-2025



Source. CCSD expenditure data

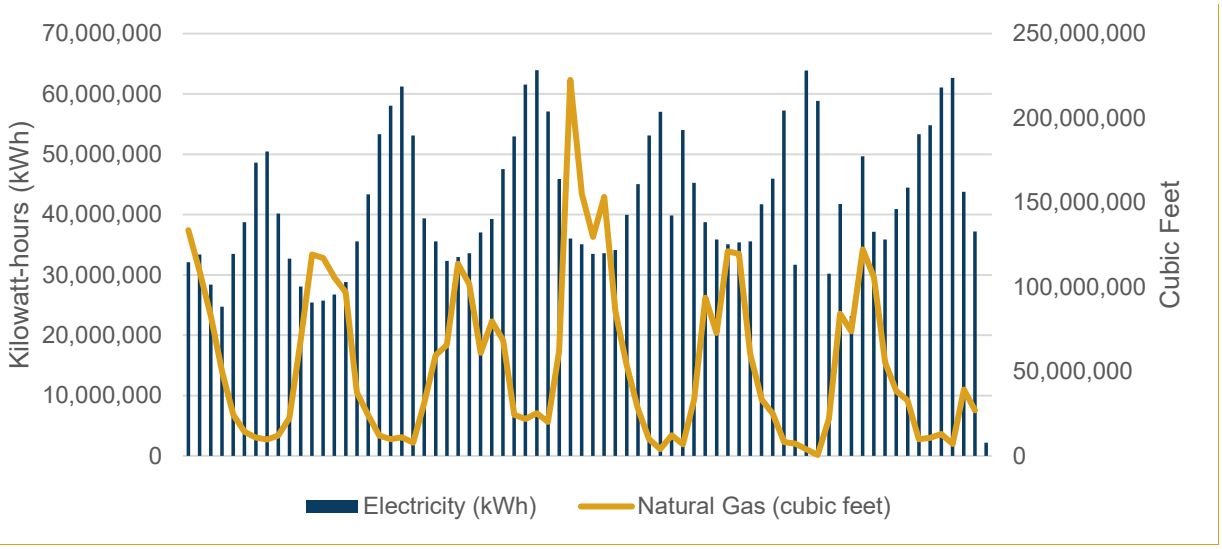
Assessment

In reviewing the CCSD data and in interviews with district staff, the consulting team made several observations:

- Electricity costs varied from $47.0 million in 2018-2019 to a peak of $70.0 million in 2023-2024 before declining to $57.7 million in 2024-2025. Electricity usage followed suit, ranging from 416 million to 510 million kWh during those years, respectively. District staff suspects that the flattening of electricity usage beginning in 2023-2024 and the subsequent reduction in 2024-2025 was due to the addition of solar panels. However, CCSD does not track the use or operational status of solar panels.
- Natural gas expenditures increased from $3.7 million in 2018-2019 to $6.3 million in 2024-2025, with a peak of $13.6 million in 2023-2024. Winter heating appears to drive most of the usage, but further analysis could reveal other factors.

Over the past seven years, energy and water demands were likely driven by post-COVID-19 pandemic recovery, added square footage from new facilities, aging infrastructure, and climate factors (e.g., Nevada heat increasing cooling demands). The peaks in the electricity consumption suggest HVAC overuse (Figure 22), but absent a drill-down to individual site usage, CCSD cannot determine where such overuse might be occurring, or if other factors (e.g., night shift custodial crew deployment) may be increasing utilities use.

Figure 22. CCSD Monthly Electricity and Natural Gas Usage, January 2020 to December 2025



Source. CCSD electricity expenditure and usage data

Using the 2024-2025 monthly electricity spend data, the consulting team compiled annual spending by school size range. As shown in Table 22, there are substantial variations by overall school facility size and within the various size categories. Some of this variation could be due to low-quality data, but it could also be due to overconsumption by various schools due to inefficient user habits or poorly maintained equipment. If there is excessive electricity usage in a specific school or a number of schools, CCSD currently lacks the systems to identify it and address it.

Table 22. Average Annual Electricity Spend by School Size, 2024-2025

School Size (Square Footage)	Number of Schools	Electricity Spend per Square Foot		
		Average	Minimum	Maximum
<50,000	8	$1.60	$0.69	$3.45
50,001 - 100,000	198	$1.42	$0.32	$4.22
100,001 - 150,000	53	$1.31	$0.12	$3.55
150,001 - 200,000	20	$1.30	$0.72	$2.55
200,001 - 250,000	5	$1.26	$1.06	$1.59
250,001 - 300,000	16	$1.36	$0.95	$2.09
300,001 - 350,000	6	$1.37	$0.78	$2.11
350,001 - 400,000+	6	$1.16	$0.97	$1.34
Overall	**312**	**$1.36**	**$0.12**	**$4.22**

Source. CCSD electricity expenditure and usage data

CCSD leadership has been aware of the need for greater focus on energy conservation for some time and has implemented initiatives to reduce consumption. In its five-year strategic plan, FOCUS: 2024, the district established a strategic priority to "ensure operational effectiveness and efficiency of school and district facilities and operational resources." In the strategies section for that priority, CCSD stated an intention to "implement strategic energy conservation and Leadership in Energy and Environmental Design (LEED) certification measures." In 2024, CCSD announced a second phase of a contract with a vendor to provide retrofits and upgrades across 204 sites. The $102 million contract price is expected to deliver $170 million in lifetime energy savings and another $700,000 reduction in annual operations and maintenance costs. This notwithstanding, installing retrofits and upgrades in no way replaces regular benchmarking; performance benchmarking can provide new insights for CCSD to act upon and achieve additional substantial benefits.

Peer Data Confirm the Gap — and the Opportunity

Data from the CGCS Managing for Results in America's Great City Schools 2024 report shows that, in various measures of utilities efficiency, CCSD's figures are in the highest quartiles (Table 23). As noted by the CGCS, higher utilities costs "signal an opportunity to evaluate fixed and variable cost factors and identify those factors that can be modified for greater efficiency." Other than regional climate differences, all of the factors the CGCS identified as influencing utilities costs are within the control of school district leadership teams, including:

- Age of buildings and physical plants;
- Amount of air-conditioned space;
- Customer support of conservation efforts to upgrade lighting and HVAC systems; and
- Energy conservation policies and management practices.

Table 23. CCSD and CGCS Utilities Benchmarks, 2020-2021 to 2022-2023

Year	CCSD	CGCS		
		Lower Quartile	Median	Upper Quartile
Utilities Costs per Square Foot				
2020-2021	$1.88	$0.88	$1.13	$1.38
2021-2022	N/A	$1.09	$1.28	$1.48
2022-2023	N/A	$1.16	$1.36	$1.61
Percent Change	**N/A**	**32%**	**20%**	**17%**
Electricity Usage per Square Foot (KWh)				
2020-2021	11.7	6.1	7.7	10.6
2021-2022	13.6	7.4	8.6	11.1
2022-2023	N/A	6.3	8.6	10.8
Percent Change	**N/A**	**3%**	**12%**	**2%**
Heating Fuel Usage per Square Foot (KBTU)				
2020-2021	11.7	6.1	7.7	10.6
2021-2022	13.6	7.4	8.6	11.1
2022-2023	N/A	6.3	8.6	10.8
Percent Change	**N/A**	**3%**	**12%**	**2%**

Note. CCSD did not submit data each year. Accordingly, the percent change over time is not calculated for CCSD. Comparisons for individual years remain valid.

Source. CGCS Managing for Results in America's Great City Schools 2024

Fiscal Impact

Through benchmarking, low-cost fixes (e.g., behavioral changes, scheduling optimizations) can be expected to achieve 10% to 20% of utility savings annually. For CCSD, a 15% savings in the core benchmarkable areas of electricity/water/gas would yield approximately $10.6 million in savings per year. The consulting team estimates this could be scaled to an annual 20% savings of $14.1 million with additional actions such as HVAC tuning and leak fixes. These figures could be reached in the methods described below.

- Electricity is currently 69% of utility costs. The consulting team estimates that a 15% reduction (~$7.3 million/year) could be achieved via scheduling (e.g., solar optimization, reduce summer peaks by 20%).
- The consulting team estimates that water/sewer costs could be reduced by 10% to 15% (~$1.5 to $2.2 million/year) by targeting irrigation waste, as such leaks are common in schools. Additional savings could be generated by putting in separate meters for cooling towers.

- The consulting team estimates that gas costs could be reduced by 10% (~$0.7 million/year) by optimizing heating via controls.

The consulting team recommends that 1.0 FTE be allocated for benchmarking coordination, evaluation, and data validation. The district may also need to spend up to $0.5 million for software integration, depending on existing software capabilities and the extent of integration.

Table 24 presents a summary of the anticipated annual General Fund cost savings over the next five years, assuming three years to fully implement the recommendation.

Table 24. Estimated Fiscal Impact, Energy Benchmarking, 2026-2027 to 2030-2031

Component	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031
1.0 FTE for Benchmarking	($100,000)	($100,000)	($100,000)	($100,000)	($100,000)
Software Integration	($500,000)	N/A	N/A	N/A	N/A
Reduce Utilities Usage	$8,000,000	$10,000,000	$12,000,000	$12,000,000	$12,000,000
Totals	**$7,400,000**	**$9,900,000**	**$11,900,000**	**$11,900,000**	**$11,900,000**

Source. Gibson Consulting Group

Implementation Strategies

Benchmarking is an established best practice in energy management. As noted by the U.S. Department of Energy: "*The first step to saving energy at your building is to benchmark — that is, to measure and compare your building's energy to similar buildings, past consumption, or a reference performance level. Benchmarking turns the information on your utility bill into knowledge you can act on*."[30]

Take advantage of available free tools.

The US Department of Energy offers a free, online ENERGY STAR Portfolio Manager tool as well as various resources to help school districts commit to an energy management plan grounded in benchmarking. An ENERGY STAR score compares a building's energy performance to similar buildings nationwide, normalized for weather and operating characteristics. A score of 50 represents median performance. A higher score is better than average. An initial target should be a score of 75 for each school/facility.

Create a benchmarking manager position.

CCSD should adopt a benchmarking program starting with these no-cost tools and then scale to integrated systems. This aligns with the Director of Facility Optimization's role in ensuring efficient use of facilities. The consulting team recommends that a full-time position be assigned to lead the benchmarking program, hereafter referred to as the Benchmarking Manager.

[30] https://www.energystar.gov/buildings/benchmark.

Implementing a robust benchmarking program will involve five steps. The Benchmarking Manager would initially be responsible for:

- Compiling and verifying details for each building, including square footage, age, and type, and creating an account within THE ENERGY STAR Portfolio Manager and inputting utility data for each school/facility. The Benchmarking Manager can calculate baseline Energy Use Intensity (EUI) figures for each school/facility.
- Comparing each school to national medians and identifying outliers based on ENERGY STAR scores as well as individual types of usage.
- Works with others in the Facilities Department to link to other systems in order to establish real-time tracking of utilities usage.
- Piloting monitoring and analysis in 10 higher-cost CCSD schools, focusing on building systems.
- Training other staff in the Facilities Department in analyzing energy consumption data and identifying appropriate actions to reduce usage.

Track and acknowledge school performance improvement.

The district should begin by aiming for a 10% annual reduction. To achieve this level of savings, the district should develop a dashboard that provides various school-level comparison options. It should also develop a process to regularly recognize top-performing schools.

10 Maximize General Fund indirect cost recovery.

Background and Context

Many federal grants allow school districts to recover certain types of costs incurred by the General Fund that support federally funded programs, such as Title programs funding supplemental services that benefit eligible students, and the U.S. Department of Agriculture (USDA), which administers and financially supports several school district child nutrition programs. Federal law (2 CFR 200) and Nevada State Law and Regulations (Nevada Administrative Code [NAC] 354.835 and NAC 354.866) guide indirect cost recovery in Nevada, and specific federal grants may have additional restrictions.

School districts can establish indirect cost rates to support these calculations instead of determining line-item allocations. There are two different types of indirect cost rates – restricted and unrestricted. The restricted rate relates primarily to supplemental administrative costs that benefit the programs, such as payroll, accounting, human resources, and general district administration costs. The unrestricted rate includes all administrative costs, and also allows certain operating costs to be applied, such as utilities, custodial services, technology services, pest control, and waste disposal. CCSD applies through the NDE for approval of their calculated indirect cost rates.

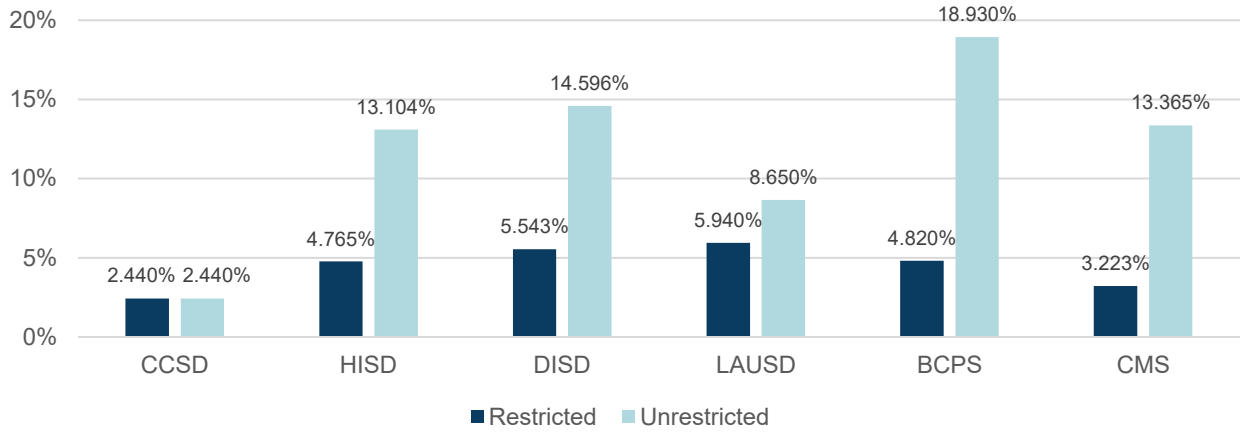
The type of rate to be applied varies depending on the type of federal program. For example, Title I grant spending is subject to the "supplement not supplant" rule, and is accordingly subject to the lower restricted rate for indirect cost recovery. The Food Services program is not subject to this rule, realizes additional

operating benefits supported by the General Fund, and is eligible to apply the unrestricted rate. These rates can be applied to eligible grant program expenditures to determine the level of indirect cost recovery each year. In applying the rates, school districts must ensure that they are not "double dipping" by charging certain costs directly to the program that are also part of the indirect cost rate calculation. The existence of a central kitchen facility serving CCSD elementary schools complicates this process. In 2024-2025, CCSD charged approximately $8.7 million in indirect costs to the food services program.

Assessment

CCSD's restricted and unrestricted indirect cost recovery rates are significantly lower than its peer districts, resulting in a potentially higher expenditure burden by the General Fund. Moreover, even though the definition of each type of rate should yield a different percentage due to the different definitions, CCSD's approved restricted and unrestricted indirect cost rates are exactly the same. Figure 23 compares CCSD's restricted and unrestricted indirect cost rates to the five peer districts. Based on this data, CCSD appears to be applying a different, and potentially incorrect, methodology in calculating its indirect cost rates.

Figure 23. Indirect Cost Recovery Rates, CCSD and Peer Districts, 2024-2025



Source. Applicable State Department of Education websites

The peer average restricted rate is 4.858%, or approximately double CCSD's restricted rate. The peer average unrestricted rate is 13.7%, or 5.6 times CCSD's unrestricted rate. The federal government allows grant recipients and subrecipients that do not have a current federal negotiated indirect cost rate to elect to charge a de minimis rate of up to 15% of modified (allowable) total direct costs; however, the State of Nevada does not allow this, and accordingly negotiates and approves both the unrestricted and restricted rates.

Implementation Strategies

Renegotiate indirect cost rates.

The CCSD Chief Financial Officer has notified the NDE that the district will request a renegotiation of the restricted and unrestricted rates. The following sections address implementation considerations for the grant programs affected by this recommendation.

Improve Food Services Department profitability.

Federal law limits the amount of federal fund balance that can be maintained in the Food Services program to 25% (three months) of annual operating expenditures. The NDE allows school districts to apply a higher percentage if approved by the state. In the wake of the COVID-19 pandemic, CCSD requested, and received state approval for, an increase in the fund balance percentage from 25% to 100%. Fund balances can be used for capital equipment replacement, and certain other capital expenditures if approved by the State of Nevada. If the Food Services program consistently exceeds the target balance, management must develop a plan to reduce it to this level. As of June 30, 2025, the CCSD Food Services program had a fund balance of $187.1 million, or approximately 105% of fiscal year (FY) 2025 operating expenditures—5 percentage points above their approved target, but 80 percentage points above the federal limit that was previously applied.[31]

CCSD should apply to the NDE to restore the fund balance target of 25% to avoid the accumulation of unnecessary fund balances and align with the federal target. Even with this lower target, taking the full amount of indirect cost recovery will not subject the CCSD Food Services program to short-term financial risks. However, since the program experienced an operating loss in FY 2025 of $24.8 million, measures will need to be taken to ensure the long-term financial stability of the program.[32] One opportunity to increase its financial performance is through the improvement of meal participation rates.

CCSD operates under the Community Eligibility Provision (CEP) at all sites. This means that all meals are served free to students, ensuring that charging students is not a barrier to meal participation. CCSD student meal participation at all grade levels falls below industry best practice standards, with the lone exception of elementary breakfast participation (Table 25). Middle and high school participation also falls below the district's own 2024 Strategic Plan targets.

Table 25. Student Meal Participation, CCSD and Industry Standards, 2023-2024

	Industry Standards	CCSD 2023-2024 Targets	CCSD 2023-2024 Actuals
Breakfast			
Elementary	35%	35%	39%
Middle	35%	35%	16%

[31] CCSD Comprehensive Annual Financial Report, 2024-2025.

[32] Ibid.

	Industry Standards	CCSD 2023-2024 Targets	CCSD 2023-2024 Actuals
High	25%	35%	10%
Lunch			
Elementary	75%	54%	58%
Middle	75%	54%	46%
High	65%	54%	26%

Source. USDA 2018 HealthierUS School Challenge Gold standards; CCSD meal participation data

In interviews and focus groups, CCSD staff cited one lunch period scheduling as the primary cause for low participation at several high schools, along with menu repetition, lack of variety of food items, and menu concepts. The district previously sought student feedback on menu items. In 2018-2019, CCSD launched a Menu Expo student taste concept and created a Student Culinary Challenge for culinary class students who helped develop recipes. During this time frame, when new concepts and menu items were developed, the central kitchen would produce the items, and they were tested with small groups of students to solicit feedback via sample tastings at various individual school sites. All of these programs were discontinued during the COVID-19 pandemic and were never resumed. Menu feedback is now supplied primarily by the cafeteria managers.

In reviewing the current menus, the consulting team found them to be repetitive and lacking in variety. Menu items appear to be chosen to get students through the serving lines as quickly as possible. Further, popular items are not offered in sufficient quantities. During on-site visits, the consulting team observed that a minimal number of items like bistro salads and grab-and-go sandwiches were available, yet not all students were offered these items. One high school had 39 salads prepared to serve a student body of 2,400 over three serving areas. Salad bars were available before the COVID-19 pandemic, and students at all grade levels could select a full reimbursable meal. These were changed to produce bars in 2022 and are not available on a daily basis. In interviews and focus groups, Food Services Department staff reinforced the positive nutritional aspects of a full salad bar and discussed how popular they were at all grade levels. Menus in peer districts show more variety and less repetition of entrées, sides, fruits, and vegetables.

Promotion of CCSD school meals programs is also minimal. The following observations were made by the consulting team:

- Food Services is not mentioned on the district website;
- Many school websites and school newsletters do not include Food Services program information;
- Many schools have large digital screens in cafeterias. Some kitchen staff reported seeking approval to use them to show menus and nutrition facts during meal periods but were denied by school administrators;
- Menu signage provided by the department is outdated and not age appropriate; and
- Program promotion on social media platforms is in its infancy and assigned to an employee at the department level.

Peer districts were found to use various ways to promote their monthly breakfast and lunch menus. For example, CMS showcases daily menus and individual items for each school on its website.

Other opportunities exist to improve the financial performance of the Food Services program:

- **Evaluate competitive food options.** The CCSD Food Services program faces competition at school sites that limit meal participation.
- **Revisit decision authority on school lunch schedules.** School principals currently determine lunch schedules, and these schedules can influence student access to meals, meal participation, and the financial performance of the Food Services program at specific school sites.

Provide planning time for other federal grant programs.

Increasing the restricted rate will reduce the amount of federal funding that would otherwise be spent on direct services. However, a new negotiated restricted rate may better reflect the General Fund's actual service contributions to these grant programs. CCSD intends to use an implementation strategy wherein the district will wait two years to apply the new restricted rate to other grants, allowing time for instructional and other leaders to plan for the change.

Fiscal Impact

The CCSD Food Services program incurred approximately $178.4 million in operating expenditures in FY 2025. Eligible direct food services expenditures for indirect cost recovery generally represent approximately 50% of total operating expenditures, or $89.2 million for CCSD's Food Services program.[33] If CCSD's unrestricted rate reflected the peer average of 15%, CCSD could have charged $12.2 million in indirect costs. It actually charged the Food Services program $8.7 million, or potentially $4.7 million less than what could be charged.

Additional General Fund savings can likely be achieved through indirect cost recovery from other federally funded programs, including Title programs and IDEA-B. Similar to the unrestricted rate, if CCSD could negotiate a restricted rate that approximates the peer average restricted rate of approximately 4.9% (versus its current approved rate of 2.440%), it could potentially increase its General Fund indirect cost recovery by an additional $3.5 million annually.

Table 26. Estimated Fiscal Impact, General Fund Indirect Cost Recovery, 2026-2027 to 2030-2031

Component	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031
Food Services	$3,500,000	$3,500,000	$3,500,000	$3,500,000	$3,500,000
Other Federal Funds	$0	$5,000,000	$5,000,000	$5,000,000	$5,000,000
Totals	**$3,500,000**	**$8,500,000**	**$8,500,000**	**$8,500,000**	**$8,500,000**

Source. Gibson Consulting Group

[33] USDA Food and Nutrition Service (FNS) Indirect Cost Guidance SP 60-2016 specifies that certain costs, such as food purchases and capital equipment, are excluded from the indirect cost calculation.

11 Incorporate efficiency measurement into the budget process.

Background and Context

Each January, CCSD begins its annual budget development process, culminating with budget approval by the board in June. The district's fiscal year is aligned with the school year and runs from July 1 to June 30. Tentative and final revenue and expenditure budgets are developed based on projections of revenue (which are based on projected student enrollment for the coming budget year) and prior years' budgeted expenditures. After the fiscal year starts, the budget may be amended based on actual "count day" enrollment and audited financial information from the prior fiscal year. Before January 1, the district must adopt an amendment to its final budget after average daily enrollment is reported for the preceding quarter. This amendment is then submitted to the Nevada Department of Taxation.

There are two major components to the CCSD budget development: the school budgets and central office budgets.

School Budgets

Upon determining the allocation of anticipated revenue to schools, school principals work with their respective SOT to develop a school operating budget that best meets the needs of their students with the available funds. The district developed a school budgeting tool (an Excel workbook containing multiple spreadsheets), along with suggested operational resource allocations, to support principals in their budget development. Budget Department staff train and support principals throughout this process. As reflected in their job description, principals have the ultimate authority in determining the final budget resource allocations as long as they are compliant with applicable laws and CCSD Board Policies. School budgets must also be aligned with district priorities established by the Superintendent.

Central Office Budgets

Budgets for all other central administration functions, including operational/administrative functions and program/district leadership, are developed through a separate process. Each January, the Central Services Executive Team receives unit reports for the various cost centers assigned to them, reflecting current year and prior year final budgeted amounts to be used to develop any revisions for the subsequent year's budget.[34] For the 2026-2027 budget, all departments were instructed to stay at their 2025-2026 amended final budget funding levels.

One recent initiative by CCSD with respect to both budget development processes is the purchase of Allovue. Allovue is a financial technology platform designed to help school districts manage budgets, allocate resources, and evaluate spending equity. Key features integrate with Enterprise Resource Planning (ERP) systems to provide real-time budget tracking, collaborative budgeting tools, and user-friendly, visual analytics for educators and administrators. Allovue is anticipated to be applied in next year's budget development process.

[34] This process is anticipated to start in October for next year's budget development.

The CCSD Budget Department has 14 budgeted positions to support the budget process, including two directors, seven coordinators, and five Budget Specialist positions. This excludes budgeting positions in the Grants Fiscal Services Unit, as the scope of this study centers on the General Fund. The Budget Department Director (the sole Level 3 Director in the department) is primarily responsible for managing the budget process and developing the budget documentation required internally and by the state.

Assessment

There are several elements of the current budget process that limit its effectiveness. These are discussed below.

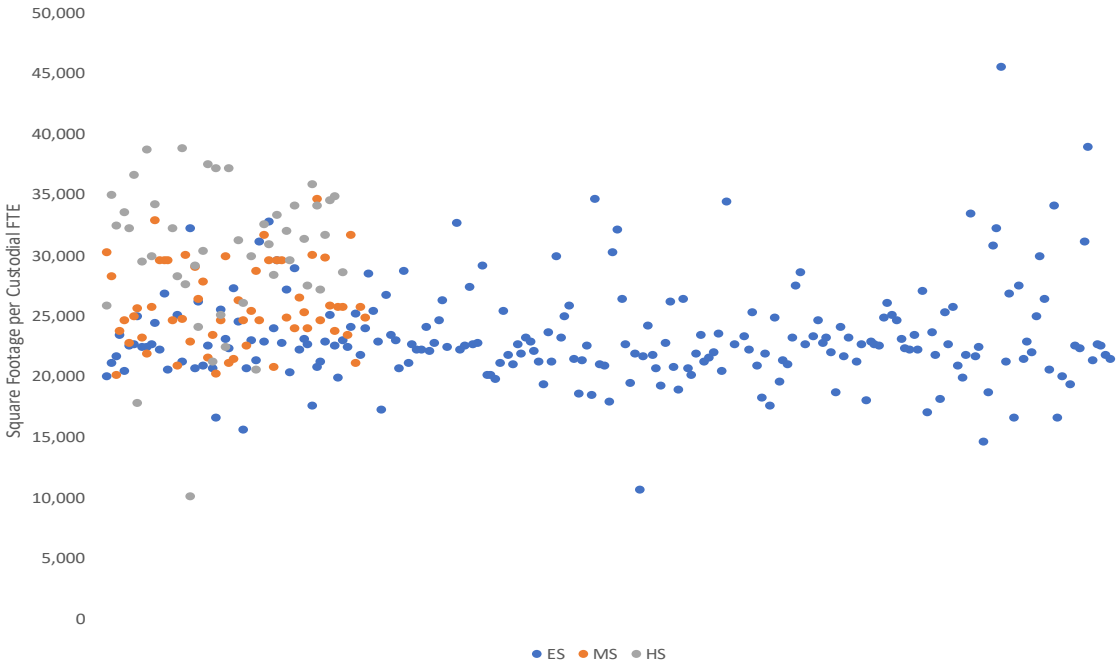
Central Office Budgets

There is no reference in the CCSD budget instructions to each department's core budget—only the incremental changes, if any, from the prior budget. These instructions implicitly assume that the core budget is reasonable. They also assume that each department's core budget is reasonable in comparison to other departments. In the absence of information demonstrating the efficiency of each department, conclusions regarding the adequacy or necessity of budgeted amounts cannot be reached. While some efficiency measures may be used to support increases or decreases in the budget, there are no required procedures to analyze central office departmental efficiency as part of the budget process. The lack of universal efficiency measures was reinforced during interviews with departmental leadership during this study and appears to be one of the driving forces in commissioning this study.

School Budgets

Several of the line items in the school district budgeting tool are accompanied by recommended staff levels based on the applicable department's suggestion of best practice staffing levels. For example, custodial service staffing recommendations are based on the square feet of space cleaned, permanent versus portable facilities, and the types of floors to be cleaned. This represents best practice and explains why custodial services overall was found to be staffed efficiently at CCSD. However, school principals are not bound by these allocations and may exchange custodial positions for other positions based on consideration of student and school needs. As a result, the custodial efficiency varies widely across schools. Figure 24 presents the range of CCSD custodial productivity/staffing efficiency, measured in gross square feet per FTE Custodian, for each school (color coded by school type). Within school types, while there are factors that may be explained by formula considerations, there are wide ranges of efficiency, from 70% differences for middle schools to 133% for elementary schools (excluding extreme outliers).

Figure 24. Gross Square Feet per Custodian FTE, CCSD Schools, 2025-2026



Source. CCSD staffing data; CCSD gross square feet per school

Budget Department Responsibilities

The job descriptions and responsibilities for the Budget Department position titles are summarized below. While there are multiple levels for each position title, the information below reflects the collective responsibilities of each position title.

- **Budget Director** – Responsible for developing and reviewing the technical phases of the CCSD budget and the annual review of budget requests; assists each division in projecting their annual fiscal requirements; develops a system of budget reporting and control; develops and files all CCSD budgets as required by the Nevada Revised Statutes (NRS); researches data and performs data analysis; provides cost projections and advises the Superintendent/Chief Information Officer on negotiations/arbitration recommendations; directs analysis of budget variances by the department; and conducts budget training sessions.
- **Budget Coordinator** – Responsible for assisting in the tentative, final, and amended final budget, and for assisting in the preparation of the annual budget and statistical report by completing assigned sections.
- **Budget Specialist** – Based on interviews with the Budget Department leadership, these lower-level positions have no responsibilities related to efficiency analysis and are focused on the demands of budget development, training, and school/department budget support.
- **Senior Financial Analyst** – While there is a job description for this position, there are no filled Senior Financial Analyst positions in the Business and Finance Unit division directory, which includes the Budget Department. This position does not reference efficiency analysis but does include other analysis responsibilities that could include efficiency analysis.

According to department leadership, the Budget Department devotes virtually all staff time and effort to the demands of a massive budget production effort, leaving no time for budget analysis.

Program Evaluation

CCSD currently does not track expenditures for lower-level programs or other initiatives to support ROI calculations. The lack of program expenditure data limits the usefulness of internal or external program evaluations the district conducts since the investment in programs is not quantified. Quantifying these investments could help support program budget decisions. The NDE is in process of developing a new reporting template which is expected to support the calculation of an academic ROI of district educational initiatives.

The Government Finance Officers Association (GFOA) recommends the incorporation of efficiency measurement into the budget process, including the reporting of these measures in budget documents provided to the board. This would require starting the budget process during the summer, allowing time to collect, analyze, and incorporate efficiency measures in the development of budgets. Similar to CCSD's current budget calendar, two peer districts (HISD and BCPS) start their budget process in January. CMS starts their budget process in December. The remaining two peers (DISD and LAUSD) start their budget process in September. Based on research of these districts' budget processes, budget calendar documentation, budget documents, and comprehensive annual financial reports, none of the peers formally incorporate efficiency measures into the budget process as suggested by the GFOA.

CCSD should incorporate efficiency measurement into its budget process in order to assess the reasonableness of total spending levels. The incorporation of efficiency measurement into the annual budget process would help support the development of budgets that demonstrate efficiency levels, eliminating the need for future contracted efficiency studies by CCSD.

Fiscal Impact

The potential cost savings cannot be reasonably estimated until after the first cycle of efficiency measurement across all departments and programs is completed. The quantification of program cost savings (resulting from a program evaluation recommendation to expand or contract the program) cannot occur until these expenditures are tracked in CCSD's financial information systems. However, baseline metrics for departmental and school efficiency can be measured this coming year.

Implementation Strategies

Incorporate efficiency measurement into budget development and reporting.

According to the GFOA, operating efficiency should be reviewed annually as a required input to budget development.[35] GFOA recommends the following implementation strategies:

[35] GFOA website: www.gfoa.org/materials/performance-measures.

- Anchor annual efficiency reviews early in the budget planning phase as part of the budget calendar (the consulting team recommends starting the efficiency measurement portion of the budget process each July);
- Apply a small, stable set of efficiency metrics every year;
- Require efficiency justification for new or continued funding;
- Tie efficiency findings to reallocation, not just reduction;
- Embed efficiency findings in board-level budget documents; and
- Focus on continuous improvement.

Define measures and validate underlying data.

Table 27 contains a sample list of efficiency measures by department or function for consideration by CCSD. The district can also draw from the data dashboard developed by the consulting team as part of this study. The district or a third-party contractor should annually validate efficiency measure calculations and the underlying data applied to sustain trust in the measurement system.

Establish low-level academic program codes to track ROI.

Future academic program evaluations conducted by the district should include a calculation of academic ROI. This would require the district to establish lower-level program account codes to track expenditures for each program or other major initiative to be evaluated. The initial and annually recurring investments can then be compared to academic or other program outcomes during the budget process to determine whether the program should be expanded, modified, or discontinued.

Assign financial analysts.

Three CCSD Senior Financial Analyst positions should be created and filled to support the efficiency measurement and reporting effort. Over time, as the efficiency of the budget development process improves through the use of Allovue, the data dashboard, and other tools, Budget Department positions may be reduced through attrition.

Table 27. Sample Efficiency Measures

General District Management	Facilities Management
▪ Total Students to Total Staff FTEs ▪ Total Students to Non-Teaching Staff FTEs ▪ Central Administration and Instructional Leadership Expenditure per Pupil ▪ Central Administration and Instructional Leadership Expenditure Percentage ▪ Total FTEs per Clerical FTE ▪ Percentage of Employees Funded by Grants	▪ Major Maintenance Cost per Student ▪ Major Maintenance Cost per Work Order ▪ Square Feet per Maintenance Staff FTE ▪ Percentage of Preventive Maintenance Work Orders ▪ Custodial Cost per Square Foot ▪ Square Feet per Custodian FTE ▪ Total Facility Occupancy to Capacity Ratio ▪ Percentage of Portable Classroom Square Feet to Total Square Feet ▪ Energy Utilization Index

School Management ▪ Pupil-Teacher Ratio ▪ Pupil-Aide Ratio ▪ Aides-Total Staff Percentage ▪ Pupil-Counselor Ratio ▪ Pupil-Psychologist Ratio ▪ Average Teacher Class Load ▪ Number of Unique Students Enrolled in Virtual Classes	**Technology Management** ▪ Students per Instructional Device ▪ Average Age of Student Devices ▪ Ratio of Total Students to Technology Staff ▪ Ratio of Total Students to Instructional Technology Staff ▪ Ratio of Total Employees to Technical Support Staff
Human Resources ▪ Total Staff to HR Staff Ratio ▪ HR Cost per District FTE ▪ Teacher Turnover Rate ▪ Non-Teacher Turnover Rate ▪ New Teacher Turnover Rate ▪ Percentage of Teacher Positions Filled on First Day of Class ▪ Workers' Compensation Claim per FTE ▪ Average Teacher Absences per Teacher (in Days) ▪ Benefits Cost as a Percentage of Wages	**Food Services Management** ▪ Meal Participation Rates by Meal Type, by School ▪ Meals per Labor Hour ▪ Food Services Total Expenditures as a Percentage of Revenues ▪ Food Cost as a Percentage of Revenues ▪ Food Services Labor Costs as a Percentage of Revenues ▪ Net Profit (Loss) of Food Service Department Excluding Capital Purchases, by School
Business Services ▪ Number of Invoices Processed per Accounts Payable (AP) FTE ▪ Number of Paychecks Processed per Payroll FTE ▪ Number of Off-Cycle Payments ▪ Payroll Expenditure per Payroll FTE ▪ Overtime as a Percentage of Salaries and Wages ▪ School Purchase Orders per School FTE ▪ Procurement Cost per Purchase Order	**Transportation Management** ▪ On-Time Performance ▪ Transportation Cost per Mile ▪ Average Daily Routes per Bus ▪ Percentage of Courtesy Riders ▪ Average Daily Ridership Percentage to Total Enrollment ▪ Accidents per 100,000 Miles

Source. Gibson Consulting Group

12 Adopt a districtwide decision authority framework.

Background and Context

How decisions are made in a school district can have a direct impact on the effectiveness and efficiency of academic programs and operational areas. In the absence of a decision authority framework, decision authority may depend on the individual in a certain position, causing inconsistent applications of decision authority across the district. Decisions in school systems are often described as site/school-based or district-based.

In 2015, Assembly Bill 394 enacted the "large school district" reorganization statute for CCSD, creating local school precincts and transferring operational authority to schools under Nevada Revised Statutes (NRS) 388G.600–680. While NRS 388G.610 previously specified certain decisions as school-based—including staff selection, procurements, and budget development—Senate Bill 460 (2025) repealed these mandates. Under revised CCSD's Regulation R-2130, schools now operate using site-based decision

authority in which authority is transferred from the district, as deemed necessary by the Superintendent, with the large district remaining responsible for all functions not explicitly transferred. The specific limits of a principal's authority are now defined by annual administrative guidelines rather than fixed state law.

CCSD implemented school-based budgeting as a result of the initial legislation, and while the district controls the allotment to individual schools, Nevada law dictates that schools can choose how to spend it on the areas under their authority.

Assessment

Site-Based Budget Decisions

The processes for school budgeting and resource allocation remain site-based. It is well-defined, documented, and places resource allocation decisions transferred by the Superintendent to the school principal under the advisement of the SOT. The 2026 principal job description also affirms the responsibility for site-based budgeting.

Beyond the statutory requirements, there are several benefits of site-based budgeting:

- **Better aligns resource allocation decisions with the responsibility for results.** Central staffing formulas can obscure who is responsible for results. If principals are to be held accountable for results, then having control over resources to achieve those results makes sense.
- **Transparency.** Under the current approach, CCSD publishes school-level allocations and staffing assumptions, making it very clear where the money is going at schools. These publications are made available on the district's website each budgeting cycle.
- **Connects the community to budget trade-offs**. The involvement of the local communities in the budget development process through the SOTs binds them as stakeholders in the schools.

There have been unintended consequences associated with the previous site-based budgeting model, notably an average combined school budget carryover exceeding $200 million per year. While NRS 388G.650 continues to allow local school precincts to carry forward year-end balances, the repeal of NRS 388G.610 and the update to CCSD Regulation 2130 have increased the district's oversight and intervention responsibilities. Principals now only exercise control over the portion of the school budget determined by the Superintendent, and the district may mandate the expenditure of carryforward funds on specific priorities if the balance exceeds 5 percent of the school's actual expenditures. This shift allows the district to mitigate excessive carryover while ensuring that allocated money is used purposefully to focus on student outcomes.

Site-based budgeting has also contributed to wide variances in operational services, such as custodial services. Some schools cut custodian positions in lieu of other positions that could more directly support student learning. Others changed work schedules, resulting in fewer custodians working after school when the school is empty and easier to clean.

Other Decisions

The decision authority framework for other school and district decisions is not well defined or documented. Site-based decision authority (and, at times, teacher-based decision authority) also exists in instructional decisions, including decisions about whether to use the district's curriculum and/or high-quality instructional materials. Classroom observations conducted during this study found that some schools and teachers applied a different curriculum and/or instructional materials in their instruction. Other school-based decision authority, such as determining the number and timing of lunch schedules, has adversely affected meal participation rates at several high schools, and in turn affected the overall financial stability of the Food Services program, which lost approximately $24.8 million in 2024-2025. These examples suggest that school flexibility and operating efficiency may be competing demands for certain decisions.

The consulting team researched CCSD's peer districts for evidence of a decision authority framework. HISD, while under a state takeover for the past three years, developed its Defined Autonomy Framework in 2024.[36] This framework classifies every school into four autonomy levels and defines which major decisions are decentralized or centralized at each level. The level of autonomy is tied directly to academic performance and accountability. This framework is perceived to have contributed to the district's significant improvement in student achievement over the past three years. HISD, similar to CCSD, has also experienced significant declines in student enrollment and state funding. CMS applies a more centralized decision authority model, but it does not have a single, documented decision authority framework. At CMS, schools do not independently control staffing allocations, position counts, compensation, core curriculum adoptions, or major budget reallocations. Neither BCPS, LAUSD, or DISD were found to have separate decision authority frameworks or documents.

Whether CCSD decides to change the placement of decision authority (within the limits of statutory authority), a team of district administrators, school administrators, and union representatives should inventory and analyze major types of decisions and develop a decision authority framework. This will help ensure that all factors have been considered and any ambiguity with regards to decision authority is addressed.

Implementation Strategies

Define factors affecting decision authority.

There are several factors that can affect the placement of decision authority. In evaluating the placement of decisions, CCSD should ask the following questions:

- Does state or federal law or regulation prescribe the decision placement?
- Do district regulations or administrative guidelines prescribe decision placement not required by statute?
- Does the decision adversely affect the flexibility schools need to meet individual student needs?

[36] HISD Defined Autonomy Framework web link: definedautonomybooklet-may.pdf.

- Which position has the technical expertise to make the decision?
- Does the decision placement affect the district's immediate or long-term cost?
- Which budget is being charged for the cost related to the decision (i.e., district or school)?
- Should the authority to make the decision be contingent on any level of school performance?
- Does the decision affect the ability of the central office to provide ongoing support?
- Could the decision have a ripple effect on other areas in the school system?
- What are the risks of making the wrong decision? Potential risks may include:
  - Adverse effects on student learning;
  - Student or employee safety risk;
  - Compliance risk;
  - Lawsuit or grievance risk;
  - Sacrifice of necessary internal controls;
  - Inconsistent/inequitable services for students that move to another school in the district;
  - Misalignment with district priorities; and
  - Higher costs.

Document and communicate a decision authority framework.

Certain educational decisions (e.g., teaching strategies for individual students) should be made at the school level in order to provide the needed flexibility to meet unique needs. Other decisions (e.g., curriculum, high-quality instructional materials) should be made at the district level to ensure that all students are learning the same curriculum at the same time in order to meet state performance standards.

Other types of decisions, such as teacher professional development, may not be as clear cut and, in some cases, may require a hybrid solution depending on the source of funding and whether the training is required by the district.

Where a district falls in terms of the level of centralized or decentralized decision authority is not as important as the need to formally define the decision authority framework so that it is consistently applied across the school district. Documentation of a single framework will help ensure that all principals and district administrators understand the criteria for making certain decisions.

At a minimum, decision authority should be identified by applying the following four categories:

- **Site-based decisions not requiring district administration approval**. These are decisions that can be made or approved independently by principals or their designees without intervention or approval by district administration. These decisions might include teaching strategies used and assignments of school projects to staff.

- **Site-based decisions requiring district office approval.** Certain decisions, such as hiring or terminating school staff, should require the approval of district administration to ensure compliance with state and federal laws and district policy.
- **Site-based selection from a list of district-provided options.** Examples of selection lists might include computer and instructional software available for purchase. Schools can be provided with a limited number of choices of computer brands and software as long as they meet minimum specifications established by the district's technology function. Purchasing items that are not on the approved list could result in the inability of the technology function to effectively support the hardware or software. Selecting from a short list provides decision authority flexibility within a defined framework that helps ensure districtwide efficiency and effectiveness.
- **District decisions.** There are certain decisions that should be made by the district administration and enforced at all schools. A single, standardized curriculum and student assessments are examples of decisions that are typically established by the district administration. In making these decisions, however, district administration should elicit input from schools and the SOTs to ensure that decisions make sense for both the schools and the district.

The implementation of this recommendation could result in additional significant cost savings, depending on where the district lands on the spectrum of centralized, decentralized, and hybrid decision authority for each major decision.

Table 28 presents a sample template for developing a decision authority framework for CCSD, with shaded rows reflecting higher priorities. Once this framework is developed, the decision authority in job descriptions and labor agreements should be aligned to it. Applicable responsibilities in the budget development process should also be aligned to the framework.

Table 28. Sample CCSD Decision Authority Framework

Decisions	Principal Decision	Principal Choice	District Approval	District Decision
Educational Decisions				
Curriculum				
Instructional Materials				
Lesson Plans				
Teaching Strategies				
Target Class Size				
Student Assessments				
Instructional Support				
Instructional Technology				
Course Offerings (Secondary)				
Schedule Type (e.g., Block)				
Discipline				

Decisions	Principal Decision	Principal Choice	District Approval	District Decision
Operational Decisions				
School Calendar				
Bell Schedule				
Resource Allocation/Budget Decisions				
School Events				
Employee Decisions (e.g., Hiring)				
Operational Hardware Procurement				
Operational Software Procurement				
School Website				
School Newsletters				
School Bus Routes				
Custodian Work Schedules				
Custodial Services Supervision				
Thermostat Control				
Lunch Schedules				
Food Services Supervision				

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