LA26-13

STATE OF NEVADA

Performance Audit

Class-Size Reduction Strategies

Clark County School District
Washoe County School District

2026

Legislative Auditor
Legislative Counsel Bureau – Audit Division

Audit Highlights

Highlights of performance audit report on Class-Size Reduction Strategies for Clark County and Washoe County School Districts issued on August 20, 2026.

Legislative Auditor report # LA26-13.

Background

The Nevada Legislature enacted legislation to establish class-size reduction processes, which were codified in Nevada Revised Statutes (NRS). The Legislature established class-size ratios for kindergarten through grade 3 (K-3) and provided funding to districts to support hiring teachers to help reach these class-size ratios. If schools do not meet required ratios, districts need to submit variance requests. In 2021, the Legislature ceased categorically funding class-size reduction, giving the districts more autonomy in their budgetary decisions.

The Legislature has established multiple district reports relating to class-size reduction, including a report of school K-3 class-size ratios and variances, an annual class-size reduction plan, and reporting on achieving nonbinding class-size ratios for all grades. In variance requests and class-size reduction plans, districts report on their plans and strategies to reduce class-size ratios.

The Nevada Department of Education (NDE) receives and compiles district class-size reduction reporting and variance requests, submitting reporting to the Nevada State Board of Education (Board). The Board has the authority to review and grant variances and approve class-size reduction plans. The Board utilizes district class-size ratio and variance data to measure the effectiveness of the district class-size reduction strategies.

Purpose of Audit

The purpose of the audit was to evaluate the efficacy of strategies or programs implemented by a school district to reduce class sizes.

The scope of our audit included a review of the district's activities from July 1, 2019, through June 30, 2024, with prior years for funding analysis purposes.

Audit Recommendations

This audit report contains five recommendations for CCSD and four recommendations for WCSD to improve district oversight of class-size reduction efforts and reporting.

CCSD accepted the five recommendations.

WCSD accepted the four recommendations.

Recommendation Status

Each district's 60-day plan for corrective action is due on November 17, 2026. In addition, the 6-month report on the status of audit recommendations is due on May 17, 2027.

Class-Size Reduction Strategies

Clark County and Washoe County School Districts

Summary

For multiple years assessed, districts' class-size reduction strategies did not reduce class-size ratios to those defined in statutes, but districts' strategies supported maintenance of reasonable class-size ratios. We assessed the effectiveness of district class-size reduction strategies through analyzing if districts achieved class-size ratios prescribed in statutes, and we reviewed annual changes in district class-size ratios and variance requests. Conclusions related to class-size reduction are based on the assessment of aggregate district class-size ratios and do not reflect an individual analysis at the school or classroom level.

The districts' class-size ratios were not comparable due to differences in how districts counted teachers. For Clark County School District (CCSD), the district's methodology resulted in inflated class-size ratios that did not reflect actual class sizes in schools. Although districts were substantially compliant in submitting K-3 class-size ratio reporting and planning, schools were not involved in reviewing certain reports. Some class-size reduction reporting was not compliant with requirements, and other reporting was not submitted by each district. Consistent class-size reduction reporting promotes transparency and accountability by ensuring stakeholders have access to comparable information across schools and districts.

Class-size ratios defined in statutes may have reduced significance as the Legislature and districts have not completely funded the base ratios for over a decade. Additionally, certain statutory class-size reduction processes do not align with current funding practices, are duplicative, and result in ratios that do not reflect actual class sizes. In statutes, the Board and NDE are assigned an integral oversight role in class-size reduction processes, but their supervision and feedback were limited. Improving the requirements, oversight, and reporting will help increase the relevance and usefulness of the class-size reduction processes.

Key Findings

- CCSD did not reduce class-size ratios to those required by statutes for school years 2019-20 to 2023-24, but it maintained reasonable ratios. (page 6)
- Washoe County School District (WCSD) reduced certain class-size ratios to the values prescribed in statutes, but not for all years assessed. (page 7)
- Even though class-size ratios exceeded those prescribed in statutes, average district-level K-3 class-size ratios for school years 2019-20 through 2023-24 for CCSD and WCSD were on average about 20 or less students per teacher. (page 7)
- District class-size variances increased from school years 2019-20 through 2023-24, and changes in statutory class-size ratio requirements contributed to this increase. (page 8)
- CCSD and WCSD implemented strategies that maintained class-size ratios at reasonable levels although these strategies did not always result in the districts meeting ratios prescribed in statutes. (page 9)
- Districts had significant differences in how they counted teachers for class-size ratios, and with CCSD, this resulted in inflated class-size ratios that did not reflect the reality of class sizes. (page 12)
- Inconsistent class-size ratio calculation methodologies resulted in CCSD and WCSD having ratios that could not be directly compared. (page 12)
- Districts submitted most class-size reduction reporting but can improve compliance with certain reporting requirements. (page 15)
- The districts can improve class-size reduction reporting, including variance requests, by involving schools more in report preparation. (page 16)
- The statutory class-size ratios for K-3 may have reduced significance as the Legislature did not categorically fund, and the districts did not allocate sufficient funding, to reach all the base ratios for over a decade. (page 20)
- Certain class-size reduction statutory processes create challenges for the districts to fulfill the requirements and produce class-size ratios that closely reflect school class sizes. (page 21)
- There are duplicate K-3 class-size reduction reporting and planning requirements. (page 22)
- Board and NDE oversight and feedback of class-size reduction processes were limited. (page 25)

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This report contains the findings, conclusions, and recommendations from our performance audit, *Class-Size Reduction Strategies – Clark County School District and Washoe County School District*. This audit was required of the Legislative Auditor by Assembly Bill 517 (Chapter 454, Statutes of Nevada, 2023). The purpose of legislative audits is to improve state government by providing the Legislature, state officials, and Nevada citizens with independent and reliable information about the operations of state agencies, school districts, programs, activities, and functions.

This audit report contains five recommendations for Clark County School District and four recommendations for Washoe County School District to improve district oversight of class-size reduction efforts and reporting. This report also contains recommendations the Legislature may want to consider to improve certain class-size reduction requirements, reporting, and processes. We are available to discuss these recommendations or any other items in the report with any legislative committees, individual legislators, or other state officials.

Respectfully submitted,

Daniel L. Crossman, CPA
Legislative Auditor

July 27, 2026
Carson City, Nevada

Class-Size Reduction Strategies

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Introduction

Background

For over 36 years, the Nevada Legislature has required districts to reduce certain student-to-teacher ratios, or class-size ratios, to values established in statutes. In 1989, the Legislature codified these processes in Nevada Revised Statutes (NRS) 388. Over time, the Legislature established class-size ratios, for core curriculum classes, of 15 students to 1 teacher (15:1) in kindergarten through grade 3 (K-3) with the goal to also reduce ratios in higher grades. In 2005, the Legislature authorized other class-size ratios aside from the base ratios previously defined if they were prescribed in conjunction with a legislative appropriation for class-size reduction.

From 2010 through 2019, required class-size ratios were changed to address budgetary challenges. Some highlights of changes to ratios included:

- To address financial challenges in 2010, the Legislature temporarily allowed districts to use higher K-3 class-size ratios to help districts with budget shortfalls.
- In 2013, legislation increased class-size ratios for kindergarten to grade 2 to 16:1 and grade 3 to 18:1.
- In 2013, appropriations for certain kindergarten classes were not sufficient to meet the 16:1 base ratio defined in statutes. In future years, districts did not receive categorical class-size reduction funding for kindergarten.
- In 2019, an appropriations bill funded higher class-size ratios at 17:1 for grades 1 and 2 and 20:1 for grade 3.

During the 81st Session of the Nevada Legislature (2021), the Pupil Centered Funding Plan (PCFP) was approved to fund K-12 education. Once the PCFP was established, the Legislature no longer categorically funded class-size reduction for K-3. Additionally, the appropriations bill which funded the PCFP did not prescribe alternative class-size ratios so lower base ratios set in statutes became effective.

Statutes require additional processes for oversight of class-size reduction efforts. The Nevada State Board of Education (Board) must establish recommendations for class-size ratios for K-12. These ratios are nonbinding, and districts are not required to submit variance requests for approval to exceed these ratios. In 2018, the Board established ratios of 15:1 for K-3 and 25:1 for grades 4 through 12.

Class-Size Reduction Reporting

Statutes require class-size reduction reporting of the districts and the Nevada Department of Education (NDE), including the following:

- Districts issue a quarterly report to NDE with class-size ratios for K-3 elementary schools. This information is also posted online on the districts' websites. In 2025, reporting frequency was changed to annual.
- School districts submit annual variance requests for each school if grades do not meet the class-size ratios required by statutes for review by the Board.
- NDE submits an annual report to the Governor's Finance Office and the Legislative Counsel Bureau regarding district teachers, substitutes, and students.
- Districts prepare an annual K-3 class-size reduction plan.
- Annually, districts post on their websites the class-size ratios that have been approved for each class.
- Districts submit a biennial report to the Legislature on the progress of meeting the nonbinding class-size ratios established by the Board.

Districts report plans and strategies they are utilizing to reduce class-size ratios through multiple reporting mechanisms. In school variance requests, districts report justifications for variances and school-level plans to reduce class-size ratios. NDE guidance for these requests states the plan must be specific to the contexts and needs of the school, and a generalized statement is not adequate. District annual class-size reduction plans must include strategies to reduce class-size ratios that align with the use of funds, variance justifications, and the school-level plans.

NDE and Board Oversight of Class-Size Reduction Efforts

Class-size reduction reporting and compliance efforts are overseen by NDE and the Board. For example, the Board reviews and has the authority to grant district variance requests to exceed class-size ratios prescribed in statutes. In addition, the Board is given the authority to approve district class-size reduction plans. The Board reviews and approves class-size reduction reporting in their public meetings. Class-size reduction reporting and variance requests are part of a consent agenda: unless a board member has a question or would like to discuss a particular item, it is not required to be discussed in the meeting.

NDE's responsibilities include monitoring information received and providing policies, procedures, and guidance to support the districts in their class-size reduction efforts. Statutes define the following requirements for NDE:

- Develop policies and procedures for monitoring class-size reduction plans and reviewing class-size ratio reporting and variance requests;
- Provide guidance to school districts on developing class-size reduction plans including required criteria each plan must include and examples of policies, plans, or strategies adopted by other states to reduce class sizes;
- Provide guidance on the requirements for reporting class-size reduction information; and
- Provide guidance on the data that must be monitored by the school districts and used to measure the effectiveness of the implementation of class-size reduction plans.

For school year 2023-24 reporting, NDE published a guidance memorandum on class-size reduction reporting and plans. It included policies and reporting requirements for class-size ratios, variances, and the annual class-size reduction plan. It also included examples of policies, plans, or strategies adopted by other states to reduce class sizes and provided guidance on the data to be monitored to measure the effectiveness of the implementation of the plans to reduce class-size ratios.

The Board is required by statutes to determine the data that must be monitored by the districts and used to measure the effectiveness of the implementation of the districts' class-size reduction plans. NDE stated the Board used the information the districts provided in their quarterly class-size reduction reporting and the annual class-size reduction plans to assess the effectiveness of the implementation of class-size reduction plans. Based on this guidance, we primarily assessed the efficacy of class-size reduction strategies based on the class-size ratios and variances presented in district reports.

Consensus Not Established on the Effectiveness of Class-Size Reduction

Published research regarding the benefits of class-size reduction provides differing conclusions. One of the foundational early studies supporting the benefits of class-size reduction was completed in Tennessee starting in the 1980s, and it showed student achievement benefits for K-3 when class sizes were reduced to 15:1 compared to larger classes at 24:1.[1] Nevada aligned its class-size ratios with the lower ratios presented in this study.

Subsequent to this study, other states reduced class sizes, and there was not a consensus in published research related to the effectiveness in improving student performance. Some studies showed improved student performance with decreased class sizes.[1,2] However, other studies showed little or no effect of class-size reduction on student achievement.[3,4] Additionally, there are studies showing mixed effects including:

[1] Nye, B.A., Zaharias, J.B., Fulton, B.D., Wallenhorst, M.P., Achilles, C.M. & Hooper, R. (1992). *The lasting benefits study: A continuing analysis of the effect of small class size in kindergarten through third grade on student achievement test scores in subsequent grade levels: Fifth grade.* Technical Report, Tennessee State University.

[2] Molnar, A., Smith, P., Zahorik, J., Palmer, A., Halbach, A., & Ehrle, K. (1999). *Evaluating the SAGE program: A pilot program in targeted pupil-teacher reduction in Wisconsin.* Educational Evaluation and Policy Analysis, 21(2), 165-177.

[3] Hoxby, C.M. (2000). *The effects of class size on student achievement: New evidence from population variation.* The Quarterly Journal of Economics, 115(4), 1239-1285.

[4] Cho, H., Glewwe, P., & Whitler, M. (2012). *Do reductions in class size raise students' test scores? Evidence from population variation in Minnesota's elementary schools.* Economics of Education Review, 31(3), 77-95.

- Decreased class size increased student achievement, though these gains can be counteracted by inexperienced teachers;[5]
- Class-size reduction can be less cost effective at improving student performance compared to investments in other programs;[6]
- Class sizes can have different effects on student performance depending on the grade;[7] and
- Reducing class sizes in lower elementary grades can negatively impact upper grade levels with higher class sizes.[8]

Scope and Objective

This audit was required of the Legislative Auditor by Assembly Bill 517 (Chapter 454, Statutes of Nevada, 2023), included in Appendix A, and was conducted pursuant to the provisions of NRS 218G.010 to 218G.270 and NRS 218G.600 to 218G.625.

The scope of our audit included a review of the districts' activities from July 1, 2019, through June 30, 2024, with prior years for funding analysis purposes. Our audit objective was to:

- Evaluate the efficacy of strategies or programs implemented by a school district to reduce class sizes.

The Legislative Auditor conducts audits as part of the Legislature's oversight responsibility for public programs. The purpose of legislative audits is to improve state government by providing the Legislature, state officials, and Nevada citizens with independent and reliable information about the operations of state agencies, school districts, programs, activities, and functions.

[5] Gilraine, M. (2020). *A method for disentangling multiple treatments from a regression discontinuity design.* Journal of Labor Economics, 38(4), 1267-1311.
[6] Yeh, S.S. (2009). *Class size reduction or rapid formative assessment?: A comparison of cost-effectiveness.* Educational Research Review, 4(1), 7-15.
[7] Etim, J.S., Etim, A.S., & Blizard, Z.D. (2020). *Class size and school performance: An analysis of elementary and middle schools.* International Journal on Studies in Education, 2(2), 66-77.
[8] Sims, D.P. (2009). *Crowding Peter to educate Paul: Lessons from a class size reduction externality.* Economics of Education Review, 28(4), 465-473.

Class-Size Ratios Exceeded Those Prescribed in Statutes but Were Monitored and Reasonably Managed by Districts

For multiple years assessed, districts' class-size reduction strategies did not reduce class-size ratios to those defined in statutes, but districts' strategies supported maintenance of reasonable class-size ratios. We assessed the effectiveness of district class-size reduction strategies through analyzing if districts achieved class-size ratios prescribed in statutes, and we reviewed annual changes in district class-size ratios and variance requests. Conclusions related to class-size reduction are based on the assessment of aggregate district class-size ratios and do not reflect an individual analysis at the school or classroom level.

Districts Maintained Reasonable Class-Size Ratios

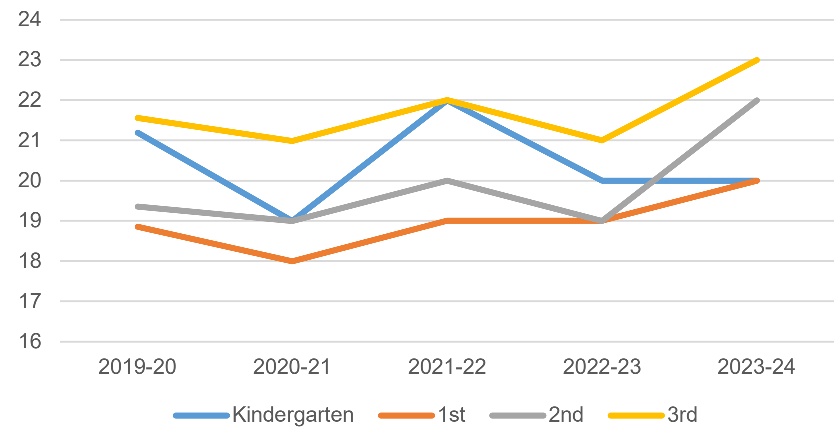
Class-size ratios were reasonable, although districts did not reduce class-size ratios to those required by statutes for multiple years assessed. Even though district class-size ratios exceeded those prescribed in statutes, the average K-3 class-size ratios were 20 or less students per teacher. From school years 2019-20 through 2023-24, districts only experienced minor average increases in class-size ratios of about two or less students per teacher. However, district variance requests increased, and statutory class-size ratio requirements contributed to this increase. Overall, districts utilized strategies to maintain reasonable class-size ratios.

Class-Size Ratios Increased but Were Reasonable

<u>CCSD</u>

For school years 2019-20 through 2023-24, CCSD did not reduce district-level class-size ratios to those prescribed in statutes, but it generally met its district class-size ratio objectives. The average district class-size ratio for K-3 for school years 2019-20 through 2023-24 was about 20 students per teacher. After school year 2019-20, CCSD met certain district class-size ratio targets it established. Exhibit 1 shows CCSD class-size ratios for K-3 for school years 2019-20 through 2023-24.

CCSD Class-Size Ratios – Number of Students Per Teacher **Exhibit 1**
School Years 2019-20 through 2023-24



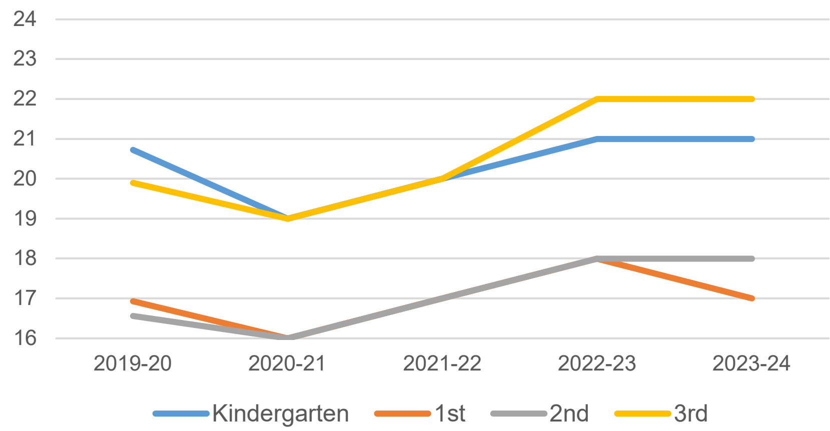
Source: Auditor analysis of district class-size reduction reporting from school years 2019-20 through 2023-24, near the end of each school year.

WCSD

For school years 2019-20 and 2020-21, WCSD utilized categorical funding specific to class-size reduction to reduce overall district class-size ratios to those prescribed in statutes for grades 1 through 3. During the same timeframe, kindergarten was not categorically funded, and WCSD did not reduce ratios to those defined in statutes, but WCSD did fund kindergarten class-size ratios consistent with historically funded levels. The average WCSD class-size ratio for K-3 for school years 2019-20 and 2020-21 was about 18 students per teacher. After enactment of the PCFP, when class-size reduction was not categorically funded, WCSD did not reduce district class-size ratios to those prescribed in statutes for K-3. During this timeframe, WCSD kept class-size ratios within two or less students of values prescribed in a fiscal year 2019 appropriations bill. The average reported class-size ratio for K-3 for school years 2021-22 through 2023-24 was about

19 students per teacher. Exhibit 2 shows WCSD class-size ratios for K-3 for school years 2019-20 through 2023-24.

WCSD Class-Size Ratios – Number of Students Per Teacher School Years 2019-20 through 2023-24 **Exhibit 2**

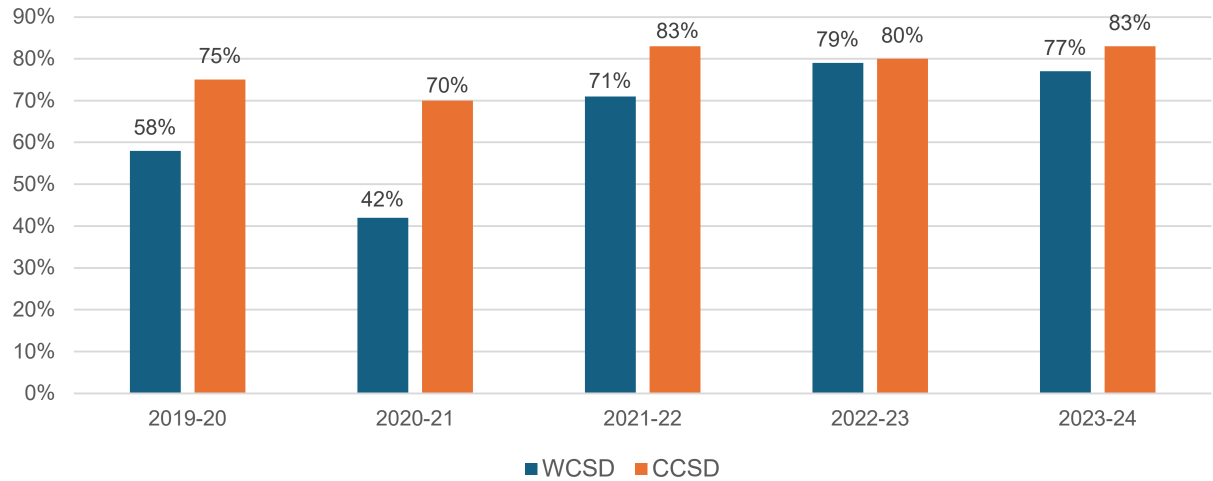


Source: Auditor analysis of district class-size reduction reporting from school years 2019-20 through 2023-24, near the end of each school year.

District Variances From Prescribed Class-Size Ratios Were Prevalent and Increased

From school years 2019-20 through 2023-24, CCSD and WCSD variance requests increased and were prevalent. After school year 2020-21, because the Legislature did not prescribe other ratios in conjunction with a legislative appropriation, required class-size ratios decreased to lower values prescribed in statutes. Therefore, districts were held accountable to meet more challenging class-size ratios, which contributed to increases in variances after school year 2020-21. Exhibit 3 shows the percentage of K-3 school grades at CCSD and WCSD with variances from school years 2019-20 through 2023-24.

Percentage of K-3 School Grades at CCSD and WCSD with Variances School Years 2019-20 through 2023-24 **Exhibit 3**



Source: Auditor analysis of district class-size reduction reporting from school years 2019-20 through 2023-24, near the end of each school year.

Strategies Resulted in Maintaining Class-Size Ratios

Districts implemented strategies to maintain stable and reasonable K-3 class-size ratios between school years 2019-20 and 2023-24. These strategies maintained but did not reduce ratios to those prescribed in statutes for most years we assessed. Although WCSD reduced class-size ratios effectively for certain grades for school years 2019-20 and 2020-21, the district's class-size reduction strategies did not result in reducing ratios to those prescribed in statutes from school years 2021-22 through 2023-24. For school years 2019-20 through 2023-24, CCSD did not reduce class-size ratios to those defined in statutes.

The districts' multiyear average class-size ratios were comparable to the most recent school year 2020-21 elementary school class-size ratio averages for many western states published by the United States Department of Education.[9] This federal data is specific to school year 2020-21, and it covers K-4, but it provides the most recent data we could locate from an authoritative source.

[9] U.S. Department of Education, National Center for Education Statistics. (2023). *Average public school class size: Average class size in public K-12 schools, by school level, class type, and state: 2020-21* [Table]. *National Teacher and Principal Survey, Public School Teacher Data File, 2020-21*. https://nces.ed.gov/surveys/ntps/estable/table/ntps/ntps2021_sflt07_t1s.

WCSD

For school years 2019-20 and 2020-21, WCSD utilized legislative categorical funding specific to class-size reduction to fund teacher positions and reduce certain class-size ratios effectively. This strategy reduced ratios at the district level to ratios prescribed in statutes for grades 1 through 3, but not kindergarten. Management stated they maintained more teaching positions in 2020-21 during the pandemic due to social distancing requirements, and this helped explain the drop in class-size ratios during this year. After school year 2020-21, all WCSD class-size reduction strategies functioned to maintain reasonable class-size ratios.

CCSD

For school years 2019-20 and 2020-21, CCSD also received and utilized legislative class-size reduction categorical funding, but this did not reduce district-level class-size ratios to those prescribed in statutes for K-3. CCSD reported additional class-size reduction strategies from school years 2019-20 through 2023-24, but these did not reduce class-size ratios at the district level to those prescribed in statutes. Instead, these strategies helped support maintenance of reasonable class-size ratios. Exhibit 4 on page 11 shows the class-size reduction strategies reported by the districts.

Districts cited an inability to achieve class-size ratios prescribed in statutes due to teacher shortages and insufficient, or a lack of, categorical funding. CCSD also stated its strategies to reduce class-size ratios were impeded by the district's lack of position control because principals had the authority to develop a balanced budget for the school, which gave the principals control over positions. As a result, CCSD reported it did not have the ability to adjust the allocation of certain teaching positions. When we interviewed school principals from both districts, they confirmed funding limitations and difficulty hiring teachers as well as student transiency as challenges to achieving class-size reduction.

District Reported Class-Size Reduction Strategies — Exhibit 4

Strategy	Examples
Reallocate Teachers to Underperforming Schools 	Add additional teacher positions to underperforming schools to reach lower class-size ratios.
Build Schools or Rezone 	Build new schools or rezone to support lower class-sizes.
Hiring Practices and Recruitment 	Recruit new teachers supported by Teach for America.
	Re-hire recently retired employees using Critical Labor Shortage designations.
	Hire teachers from countries outside of the United States using the J-1 Visa Program.
	Implement Alternative Route to Licensure programs which support individuals with higher education degrees to become teachers.
	Attract teachers through holding job fairs.
	Support professional employees to become licensed teachers.
	Maintain partnerships with higher education institutions to establish a pipeline of candidates.
	Utilize long-term substitute assignments.
Allocate Funding Towards New Teacher Positions 	Establish budgets to reduce class-size ratios or coach principals to adjust budgets to reduce class-size ratios.
	Use increased funding allocations to address class-size reduction by funding additional positions.
	Enable schools to request additional funding to be used to hire new teaching positions.
	Utilize federal funding to hire teachers.
Professional Learning Opportunities for Teachers 	Provide professional learning opportunities for teachers.
	Support teacher interns with an experienced mentor teacher.
	Support new teachers with experienced site-based teachers.
Teacher Retention 	Provide financial incentives for teachers at certain schools in high burnout and turnover areas.
	Improve teacher compensation to attract new teachers and retain existing teachers.

Source: Auditor compiled strategies obtained from the districts.

Districts Can Enhance Class-Size Reduction Reporting and Planning

The districts' class-size ratios were not comparable due to differences in how districts counted teachers. For CCSD, the district's methodology resulted in inflated class-size ratios that did not reflect actual class sizes in schools. Although districts were substantially compliant in submitting K-3 class-size ratio reporting and planning, schools were not involved in reviewing certain reports. Some class-size reduction reporting was not compliant with requirements, and other reporting was not submitted by each district. Consistent class-size reduction reporting promotes transparency and accountability by ensuring stakeholders have access to comparable information across schools and districts.

Class-Size Ratio Reporting Calculations Inconsistent

Districts had differences in how they counted teachers for class-size ratios, and in some cases, this resulted in inflated ratios that did not reflect the reality of class sizes. The districts used different methodologies for counting teachers and long-term substitutes in ways that made the reporting not comparable between districts. For CCSD, the majority of the judgmentally selected sample of class-size ratios were on average more than twice the class-size ratios calculated using class rosters obtained directly from schools. Due to the divergences between the districts, certain reported class-size ratios could be misinterpreted by the Legislature and public.

Districts' Methodologies for Class-Size Reduction Reporting Differ

District methodologies for counting teachers for class-size ratios were substantially different, resulting in class-size ratios that could not be directly compared between the districts. CCSD counted teachers by identifying individuals hired for student instruction. In contrast, WCSD reported the total teacher positions the district budgeted for the period assessed. Additionally, CCSD did not include long-term substitutes assigned to teach classes. In contrast, WCSD included long-term substitutes as they would be contracted to fill budgeted positions.

NDE instructions did not define whether counting budgeted or hired teachers are both appropriate methodologies. WCSD stated it utilized budgeted teacher positions for calculating class-size ratios because, historically, it needed to prove it used categorical class-size reduction funds to supplement, and not supplant, General Fund teacher allocations.

CCSD Class-Size Ratios Were Inflated

Many reported CCSD class-size ratios were considerably higher than class-size ratios calculated using class information received directly from the schools. Ratios were higher because CCSD did not count long-term substitutes assigned to fill full-time teaching positions, and CCSD downloaded the teacher list after certain teachers terminated their employment. District class-size ratios frequently did not reflect the actual class sizes recorded in school rosters, and this could impact the Legislature's and public's comprehension of class-size ratio information.

After we identified and selected schools with high class-size ratios calculated by the district, we assessed the sample of 36 K-3 grade-level class-size ratios recorded near the end of the 2023-24 school year. This sample included ratios as high as 70 to 92 students per teacher. For 24 of 36 (67%) class-size ratios assessed, district records did not account for certain licensed educational personnel teaching in classes included in the school class rosters. For these 24 samples, the ratios calculated by the district were on average more than twice the school values. For example, grades with class-size ratios listed as 92 and 76 on the district report had ratios calculated from school rosters of 31 and 15, respectively. On average, undercounted class-size ratios were over 21 students higher in district reporting compared to school reporting.

We assessed supporting calculations for the 24 class-size ratios with significant variations between the district and school values. Class-size ratios are calculated by dividing student enrollment at a school in a specific grade by the total number of licensed educational personnel who teach the grade level. We identified the following for these samples explaining the significantly higher district class-size ratios:

- 10 (42%) samples did not include long-term substitutes assigned to teach classes;
- 5 (21%) samples did not include teachers that taught during the term but finished employment before the teacher data was downloaded; and
- 9 (37%) samples did not include long-term substitutes and teachers that taught during the term but finished employment before the teacher data was downloaded.

CCSD excluded teachers and substitutes in their class-size ratio calculations that were actively teaching classes, inflating ratios in a way that did not reflect the reality of class sizes and could be difficult for the Legislature and public to understand. Statutes do not clearly define whether substitutes should be counted, including long-term substitutes. However, NDE instructions required certain substitutes to be counted. When we asked NDE staff if substitutes should be counted, they stated their instructions were in error, and they believed substitutes should not be counted. Therefore, there was insufficient guidance and an unclear understanding of whether substitutes should be included in class-size ratios. It is clear that when substitutes were not included, many ratios became inflated, diverging significantly from actual class sizes.

Another factor contributing to higher class-size ratios was the district downloading the teacher data after many teachers had finished their employment with the district. Senate Bill 460 (Chapter 506, Statutes of Nevada, 2025) updated requirements so that class-size ratio reporting must be submitted annually by October 1 each year. These updated provisions helped resolve this identified issue by establishing the reporting timeline well into the beginning of the school year.

WCSD Reporting More Closely Matched School Class-Size Ratios

WCSD class-size ratios generally aligned with class-size information received directly from the schools, but there were a few deviations. After we identified and selected schools with high class-size ratios calculated by the district, we assessed the sample of 24 K-3 grade-level class-size ratios recorded near the end of the school year 2023-24. This included a grade with the maximum ratio of 34. Of 24 sampled class-size ratios, 21 (88%) ratios reconciled between district calculations and school rosters. Inclusion of substitutes in WCSD teacher counts supported improved accuracy of the class-size ratios calculated by the district.

For the 3 class-size ratios that did not reconcile, the ratios calculated by the district were on average 26%, or 5 students, higher than the school-derived values. Two of the three ratios did not reconcile because the schools reallocated teachers between grades, and WCSD's system did not have this updated information. The third ratio did not reconcile due to a district data error.

Districts Can Improve Class-Size Reduction Reporting Practices

Districts were substantially compliant in submitting K-3 class-size ratio reporting, variance requests, and class-size reduction plans. However, some class-size reduction reporting was not compliant with NDE requirements and other reporting was not submitted by each district. WCSD and CCSD school principals reported they were not involved in the production of variance requests.

Districts Submitted Most Class-Size Reduction Reporting but Can Improve Some Reporting Practices

Districts submitted most class-size reduction reporting but can improve compliance with other reporting requirements. For certain missing or incomplete reporting, districts were unaware of reporting requirements and stated they lacked a template to support reporting. District class-size reduction reporting helps inform the Legislature and public regarding district efforts to support school performance.

After reviewing district class-size reduction reporting from school years 2019-20 through 2023-24, we found the districts submitted K-3 class-size reduction reports and variance requests as required by statutes. Additionally, districts were substantially compliant with submitting annual class-size reduction plans. These reports are fundamental in assessing the functionality of district class-size reduction efforts established in NRS 388. Districts accomplished this reporting compliance through staff assigned and dedicated to these processes.

Limited School Involvement in Class-Size Reduction Reporting

The districts can improve class-size reduction reporting, including variance requests, by involving schools more in the report preparation process. We interviewed 10 CCSD and 6 WCSD school principals at schools with high K-3 class-size ratios. Only one principal was aware of the variance requests specific to their schools. Additionally, all the principals reported they were not involved with the districts in producing school-specific variance requests. Principals' concerns with reducing class sizes included difficulty hiring teachers, fluctuations in student numbers, challenges with ineffective teachers, lack of control to hire teachers, and limited funding.

WCSD worked with schools to produce certain aspects of class-size reduction reporting. WCSD management stated the district determines class-size ratios for all their schools, and the schools would not need to have a class-size reduction plan because the district manages the process centrally. CCSD staff stated when there was categorical class-size reduction funding, the district would work with schools to help provide funding to schools to lower class-size ratios based on need. After the categorical funding ended, CCSD human resources staff developed the variance reports and plans, but did not work directly with the schools in generating the class-size reduction reporting. Although funding and district oversight structures impacted how districts worked with schools, school involvement in certain aspects of class-size ratio and variance reporting could improve the accuracy and relevance of this data.

CCSD Can Improve Variance Reporting

We assessed the accuracy of calculations for class-size ratios and variances for CCSD and WCSD for school years 2019-20 through 2023-24. All district calculations were sufficiently accurate except for CCSD's variance determinations for school year 2020-21. Over 18% of variances submitted by CCSD in school year 2020-21 were submitted improperly. These variances were submitted even though they did not need to be. CCSD reported an inflated number of schools with grades exceeding class-size ratios, and thus the Legislature and public did not have accurate information with which to assess school performance related to class-size ratios.

Districts Did Not Submit Certain Class-Size Reduction Reports

The districts did not submit some class-size reduction reporting. Reporting promotes accountability by documenting whether schools and programs are meeting their intended goals.

CCSD did not submit the following required reporting:

- Biennial school district report due in 2023 to the Legislature on meeting nonbinding recommendations for student-to-teacher ratios for K-12 as required by NRS 388.890(6).

WCSD did not submit the following required reporting:

- Substitute reporting as part of class-size reduction reporting as required by NRS 388.700(5)(c) for school year 2023-24; and
- Biennial school district report due in 2023 to the Legislature on meeting nonbinding recommendations for student-to-teacher ratios for K-12 as required by NRS 388.890(6).

WCSD staff confirmed they did not include the substitutes in their previous reporting, but they did complete the reporting in school year 2025-26. Regarding the nonbinding class-size ratio reporting, the districts expressed concerns with the lack of an NDE template for the reporting. Because statutes state districts should submit this reporting to the Legislative Counsel Bureau for transmittal to the Legislature, we sought to understand NDE's view on its role in this process since NDE is not referenced in these statutes regarding this reporting. NDE management stated they thought the districts would be responsible to submit this directly to the Legislature.

We located reporting compiled by NDE in 2024 related to the progress of the districts in meeting the nonbinding ratios of students to specialized instructional support personnel also required by NRS 388.890(6). Since NDE staff stated they sent the districts a template for this reporting to compile the specialized instructional support personnel information, it is understandable the districts would expect a template for class-size ratio reporting.

State class-size ratio reporting promotes transparency and accountability, helping the public understand how school districts are performing and using resources. When reporting is not submitted, decision makers may lack the information needed to improve processes and policies.

CCSD Recommendations

1. Request guidance from NDE regarding counting substitutes and other teachers needed to be included in class-size ratios to support the completeness, usefulness, accuracy, and consistency of class-size reduction reporting.
2. Document a procedure for review of class-size ratios to identify schools with high class-size ratios, that includes a quality check of the ratios for accuracy and fidelity in representing class sizes.
3. Enhance class-size reduction policies and procedures to involve schools in district reporting.
4. Ensure reporting required by NRS 388 is submitted to the appropriate entity.

WCSD Recommendations

1. Request guidance from NDE regarding counting substitutes and other teachers needed to be included in class-size ratios to support the completeness, usefulness, accuracy, and consistency of class-size reduction reporting.
2. Enhance class-size reduction policies and procedures to involve schools in district reporting.
3. Ensure reporting required by NRS 388 is submitted to the appropriate entity.

Legislative Changes May Improve Class-Size Reduction Processes

Class-size ratios defined in statutes may have reduced significance as the Legislature and districts have not completely funded the base ratios for over a decade. Additionally, certain statutory class-size reduction processes do not align with current funding practices, are duplicative, and result in ratios that do not reflect actual class sizes. In statutes, the Board and NDE are assigned an integral oversight role in class-size reduction processes, but their supervision and feedback were limited. Improving the requirements, oversight, and reporting will help increase the relevance and usefulness of the class-size reduction processes.

Current Class-Size Ratio Values May Have Reduced Significance

The class-size ratios defined in NRS 388 for K-3 may have reduced significance. The Legislature did not categorically fund, and the districts did not allocate sufficient funding to reach all the base ratios for over a decade. After categorical funding was eliminated with the PCFP, statutory requirements activated lower base class-size ratios, causing districts to be accountable for more challenging ratios and requiring more resource investment. As districts did not prioritize additional funding to meet the ratios defined in statutes after the PCFP, there was an increase in district variances.

Legislative funding for class-size reduction has been historically limited. Prior examples of funding limitations included:

- For school years 2013-14 and 2014-15, the Legislature only provided sufficient funding for certain grades to meet lower base ratios prescribed in statutes.

- From school years 2015-16 through 2020-21, all grades 1-3 class-size ratios were funded above base ratios prescribed in statutes, with kindergarten no longer receiving categorical funding starting school year 2017-18.
- In 2021, the Legislature enacted the PCFP which resulted in the elimination of categorical class-size reduction funding starting school year 2021-22. After the PCFP, lower, more challenging base class-size ratios, which needed more funding to achieve, went into effect according to statutes. As a result, in school years 2021-22, there was an increase in K-3 variances requested by both districts.

After the PCFP was instituted, districts prioritized funding towards teacher and staff compensation and other initiatives. Districts highlighted the importance of increasing teacher compensation to support retention of existing staff and recruitment of new staff. As a result, districts did not allocate increased funding to meet the K-3 base ratios prescribed in statutes.

Funding limitations and teacher shortages had an impact on class-size reduction efforts. In addition, after the PCFP, districts expressed concerns with the reasonableness of the implementation of lower ratios without categorical funding. Apart from funding limitations, for the periods we assessed, districts stated due to teacher shortages, even if they were provided additional funding, they would likely not be able to fill all funded positions.

Class-Size Reduction Statutes Can Be Improved

Certain class-size reduction processes in statutes resulted in inconsistent or inefficient practices and could be improved. Even though the PCFP eliminated categorical class-size reduction funding, statutes retain reporting provisions directly linked to class-size reduction funding. Additionally, statutes require duplicative class-size reduction reporting. Statutory provisions outlining how to calculate class-size ratios can sometimes lack specificity or exclude certain teachers actively affecting class-size ratios. Improving the clarity, relevance, and completeness of class-size reduction reporting would support the Legislature’s and public’s understanding of class-size reduction processes.

Statutes Linked Directly to Categorical Funding

Although legislative categorical class-size reduction funding ended after the PCFP, statutes retain reporting criteria directly associated with categorical funding being provided to districts.

- NRS 388.700(4) states the Board may grant a school district a variance from the prescribed class-size ratios when there is not funding **specifically set aside for the reduction of pupil-teacher ratios**. Therefore, the primary justification cited in statutes for not achieving class-size ratios is continually enabled under the PCFP.
- NRS 388.720(1) states districts need to develop a plan to reduce the district's K-3 class-size ratios within the limits of available financial support **specifically set aside for this purpose**. Therefore, the plan is directly linked to either categorical funding, provided by the Legislature or funding allocated by the districts.

A district stated after converting to the PCFP, the statutes relating to class-size reduction were not modernized or updated to reflect the effects of the PCFP. NDE staff stated the reality of class-size reduction is largely one of funding. They also stated without funding, schools cannot be expanded, teachers or paraprofessionals cannot be hired, and ratios cannot be reduced.

Duplicative Class-Size Reduction Requirements

Due to duplicative class-size reduction reporting requirements, there is an opportunity to reduce district reporting burden while maintaining key class-size reduction reporting. Not only are there duplicate elements within existing K-3 class-size reduction reporting and planning requirements, class-size ratios are also submitted via multiple processes with different submission and processing requirements.

<u>Class-Size Reporting and Plan Have Redundancies</u>

District class-size reduction plans and class-size ratio and variance reporting included redundant information like district-level class-size ratios, variance reporting, and strategies to reduce class-size ratios. Although there were differences in data preparation between the reports and plans, there is an opportunity to consolidate reporting, reduce paperwork, and still comply with statutes. Management at a district stated the class-size reduction plan could be eliminated due to the lack of feedback from NDE and the Board, and because statutes directly associate the plans with funding not categorically provided by the Legislature. They also stated the class-size reduction report contains sufficient class-size ratio and variance information.

Variance Requests Are Duplicative

Individual variance requests also had duplicated information. Statutes require an individual variance request for each school that exceeds class-size ratios prescribed in statutes. NDE provided guidance to districts that a variance request should include a school-level plan specific to the needs of the school and a generalized statement is not adequate. We assessed variance requests near the end of school years 2019-20 through 2023-24 from a sample of 23 CCSD and 10 WCSD schools. These requests contained duplicated justifications and plans that were generic for the districts. For school year 2023-24, WCSD did record the school-specific costs necessary to hire the needed teachers to reach the ratios set in statutes.

WCSD reported it did not create school-specific plans because the district sets ratios for schools through a centralized approach. CCSD reported it does not have sufficient funding and staff to generate all the unique school-level plans and justifications. Indeed, in school year 2023-24, CCSD would have needed to generate 230 and WCSD would have needed to generate 64 distinct school justifications and plans. A district stated the variance request forms are not useful because they contain duplicated information found in other reports, and the district did not receive specific responses to the variances from the Board.

Requiring districts to generate school and district class-size reduction plans may be impractical when districts have limited monetary and teaching resources, and their goals are not to reduce class-size ratios to those established in statutes. NDE staff stated that fundamentally, class-size reduction requires funding for progress, and that the variance and class-size reduction plan processes are compliance tasks with no real impact in driving policy or change.

Districts Report Redundant Class-Size Information With Two Separate Processes

Districts report class-size ratio information through two distinct mechanisms. They report school grade-level class-size ratios for the Nevada Report Card and for class-size reduction and variance reporting. These two reports retain similar methodologies for student and teacher counts. Additionally, school year 2023-24 Nevada Report Card class-size ratios more closely matched class-size ratios calculated using school roster data compared to class-size reduction and variance reporting. NDE stated the current class-size ratio reporting processes are duplicative, and there should be one data collection and validation effort.

Class-Size Ratio Methodology Missing Teachers Actively Affecting Class Sizes

We identified instances when students were counted in class-size ratio reporting, but their teachers were not. For example, statutes exclude special education and gifted and talented education (GATE) teachers from being counted in class-size ratios, but students in these programs were included in student counts. A district reported it has certain GATE and special education programming outside of general education classrooms for most or all of the school day, and these teachers were not counted. Additionally, statutes do not clearly define if substitutes as educational professionals should be included in the calculation of class-size ratios. NDE required counting substitutes in its reporting instructions to the districts, but NDE staff later stated this was an error.

A legislative appropriations bill suggested utilizing remedial teachers to support class-size reduction, but because remedial teachers generally teach small groups of students pulled out of classes, statutory language in NRS 388.700 eliminates these teachers from being counted in the class-size ratios. Additionally, a legislative appropriations bill stated team teaching was unreasonable in certain instances for class-size reduction while NDE defined team teaching as a strategy for class-size reduction.

If the goal of determining class-size ratios is to accurately reflect the student and teacher experience, the current class-size ratio calculations are not always reflecting these conditions. If the Legislature is utilizing class-size ratio information to inform its budgeting process, it could be making determinations with inflated class-size ratios that do not reflect actual class sizes. For example, a district reported if special education teachers were included, class-size ratios would be reduced and would better reflect the reality of the class sizes.

Board and NDE Oversight Limited

The Board and NDE have critical oversight roles in class-size reduction processes, but their supervision and feedback could be enhanced. Improved communication of review and feedback regarding class-size reduction reporting and planning could support more complete and compliant reporting.

Although the Board is assigned statutory responsibility to approve or deny class-size reduction plans and variance requests, Board review and approval takes place using consent agenda items that do not require discussion unless specifically requested by the Board. Based on interviews with the districts and NDE and review of available documentation from 2023 and 2024, neither NDE nor the Board provided feedback to the districts regarding specific class-size reduction plans and variance requests. However, NDE provided support in regard to the technical aspects of completing the templates.

NDE and the districts reported they are not aware of the Board rejecting variance requests even though we identified some requests that were incomplete. Incomplete variance requests were approved, underscoring the limitations of the review and approval process. NDE staff stated they gather data and present it to the Board. The Board can grant variances and approve class-size reduction plans, but statutes do not provide additional details on expectations for how the Board enforces their decisions and how the Board and NDE will communicate with the districts the results of their review and any associated feedback.

Without feedback, districts did not see the utility of class-size reduction reporting and were unaware if they were compliant with the requirements of the process. Oversight of reporting and plans was also hindered because NDE has not established documented policies and procedures for monitoring class-size reduction plans, reports, and reviewing variance requests. Without these policies and procedures, NDE did not have documented requirements to support adequate review and monitoring of class-size reduction plans and reporting. Improved NDE and Board review and feedback for class-size reduction reporting would be needed to better support compliance and provide more meaningful information.

Areas for Legislative Consideration

The Legislature establishes the statutory framework for the state's class-size reduction processes by enacting laws defining program requirements, funding, and accountability. Legislative oversight helps ensure the class-size reduction practices are administered effectively and remain aligned with state educational priorities with the ultimate goal of maximizing educational opportunities for Nevada students. The Legislature may want to consider evaluating and revising class-size reduction processes in the following ways:

- Enact an interim research study to assess Nevada class-size reduction statutes, optimal class-size ratios, and the cost-benefit of implementing class-size reduction initiatives.
- Remove requirement for districts to submit variance requests for individual schools.
- Reduce duplicative class-size reduction reporting and planning to a single annual report that could utilize Nevada Report Card class-size ratio data.
- Update class-size reduction reporting requirements so reporting is useful even if there is limited or no categorical funding.
- Update class-size ratio requirements in statutes to align with budgetary actualities or other determined best practice

and to reduce the prevalence of variances caused by impractical class-size ratios.

- Clarify guidance to ensure all relevant licensed educational personnel are counted in class-size ratios to reflect actual class-size ratios.

CCSD Recommendation

5. Submit a petition as defined in Senate Bill 460 (2025) that requests removal of class-size reduction reporting that is duplicative or does not provide information or data that is used by the districts, NDE, or the Board to support educational outcomes.

WCSD Recommendation

4. Submit a petition as defined in Senate Bill 460 (2025) that requests removal of class-size reduction reporting that is duplicative or does not provide information or data that is used by the districts, NDE, or the Board to support educational outcomes.

Appendix A

Excerpts From Assembly Bill 517, Chapter 454 From the 2023 Legislative Session

Assembly Bill No. 517–Committee on Ways and Means

CHAPTER 454

AN ACT relating to the Legislative Counsel Bureau; requiring the Legislative Auditor to conduct performance audits of certain school districts and the State Public Charter School Authority; authorizing the Chair of the Interim Finance Committee to request certain additional audits of school districts; establishing provisions governing such performance audits; and providing other matters properly relating thereto.

Legislative Counsel's Digest:

Existing law establishes the Legislative Counsel Bureau which consists of a Legislative Commission, an Interim Finance Committee, a Director, an Audit Division, a Fiscal Analysis Division, a Legal Division, a Research Division and an Administrative Division. (NRS 218F.100)

Existing law requires the Legislative Auditor, who is the chief of the Audit Division, to conduct certain audits of accounts, funds and other records of agencies of the State to determine certain information. (NRS 218F.100, 218G.200) **Section 5** of this bill requires the Legislative Auditor to conduct a performance audit of the two school districts with the largest number of enrolled pupils in this State and the State Public Charter School Authority not later than August 31, 2026, and not less than once every 4 years thereafter. **Section 5** authorizes the Legislative Auditor to evaluate certain matters as part of such a performance audit and to exercise his or her professional judgment in determining the scope and manner of work to be conducted and the objectives of each such audit. **Sections 5, 8 and 9** of this bill require the final written report of each audit to be presented to the Legislative Commission, the Interim Finance Committee or a subcommittee of the Interim Finance Committee and, under certain circumstances, the Audit Subcommittee of the Legislative Commission, by certain dates.

Section 6 of this bill authorizes the Chair of the Interim Finance Committee, not later than January 1, 2026, and every 4 years thereafter, to request that the Legislative Auditor conduct a performance audit of up to three additional school districts. **Sections 6, 8 and 9** of this bill require the final written report of each such audit to be presented to the Legislative Commission, the Interim Finance Committee or a subcommittee of the Interim Finance Committee and, under certain circumstances, the Audit Subcommittee of the Legislative Commission, by certain dates.

Section 7 of this bill requires the Legislative Auditor or the authorized representative of the Legislative Auditor to furnish a copy of the preliminary report of a performance audit to the superintendent of the respective school district or the Executive Director of the State Public Charter School Authority, as applicable. **Section 7** requires the superintendent of the respective school district or the Executive Director of the State Public Charter School Authority, as applicable, to submit to the Legislative Auditor a written statement of explanation or rebuttal concerning any findings for inclusion in the final report. **Section 8** of this bill requires the Legislative Auditor to furnish copies of the final written report to certain persons and prohibits the Legislative Auditor from disclosing the contents of an audit before it has been presented to certain legislative bodies. **Section 8** authorizes the Legislative Commission to adopt certain regulations regarding the presentation and distribution of the final written report.

82nd Session (2023)

Appendix A

Excerpts From Assembly Bill 517, Chapter 454 From the 2023 Legislative Session (continued)

Section 9 of this bill requires the Legislative Commission or Audit Subcommittee to notify the respective school district or the State Public Charter School Authority, as applicable, of its acceptance of a final written report of an audit that contains a recommendation for corrective action and requires the school district or the State Public Charter School Authority, as applicable, to submit a plan for corrective action to the Legislative Auditor. **Section 9** requires a person who submits a plan for corrective action to submit to the Legislative Auditor a report regarding the implementation of any recommendations of the Legislative Auditor.

Section 10 of this bill requires the officers and employees of a school district or the State Public Charter School Authority to provide certain assistance to the Legislative Auditor or the authorized representative of the Legislative Auditor in the inspection, examination and audit of books, accounts, records, reports or other documents. **Section 10** requires each school district or the State Public Charter School Authority to cooperate fully with the Legislative Auditor or the authorized representative of the Legislative Auditor in the performance of his or her duties with respect to a performance audit conducted pursuant to **sections 5-10** of this bill.

EXPLANATION – Matter in ***bolded italics*** is new; matter between brackets ~~[omitted material]~~ is material to be omitted.

THE PEOPLE OF THE STATE OF NEVADA, REPRESENTED IN SENATE AND ASSEMBLY, DO ENACT AS FOLLOWS:

Sections 1-3. (Deleted by amendment.)

Sec. 4. Chapter 218G of NRS is hereby amended by adding thereto the provisions set forth as sections 5 to 10, inclusive, of this act.

Sec. 5. ***1. The Legislative Auditor shall, not later than August 31, 2026, and not less than once every 4 years thereafter, conduct a performance audit of each of the following entities:***

(a) The school district in this State with the largest number of pupils enrolled;

(b) The school district in this State with the second largest number of pupils enrolled; and

(c) The State Public Charter School Authority.

2. As part of a performance audit conducted pursuant to this section, the Legislative Auditor may evaluate, without limitation:

(a) Compliance with statutory requirements concerning annual reports of accountability, as well as consistency, or lack thereof, in the methodology used for such reporting;

(b) Compliance with state or local laws relating to contracting with outside entities to provide goods or services;

(c) Whether any plans presented by the school district or the State Public Charter School Authority to the Legislature or the Interim Finance Committee, including, without limitation, any subcommittee of the Interim Finance Committee, have been

Appendix A

Excerpts From Assembly Bill 517, Chapter 454 From the 2023 Legislative Session (continued)

implemented and whether any such plan is achieving or has achieved the desired outcome;

(d) The efficacy of any strategy or program implemented at one or more schools to:

(1) Improve the proficiency of pupils in the subject areas of reading, mathematics, science or writing;

(2) Improve the educational outcomes of pupils who are English learners, at-risk pupils or receiving special education;

(3) Improve the academic performance of pupils enrolled in a Title I school, as defined in NRS 385A.040; or

(4) Increase parental involvement and family and community engagement in public schools.

(e) The efficacy of any strategy or program of recruitment or retention designed to ensure the availability of qualified teachers and other educational personnel and support staff, including, without limitation, mental health professionals.

(f) The efficacy of any strategy or program implemented by a school district or the State Public Charter School Authority to reduce class sizes.

(g) Any other matter which the Legislative Auditor is requested to evaluate by the Interim Finance Committee.

3. The Legislative Auditor, in performing his or her duties pursuant to this section and section 6 of this act, may exercise his or her professional judgment in determining the scope and manner of work to be conducted and the objectives of each audit.

4. The Legislative Auditor shall, on or before September 1, 2026, and every 4 years thereafter, present to the Legislative Commission a final written report of each audit conducted pursuant to this section during the immediately preceding 4 years.

5. The Legislative Auditor shall present a final written report of each audit conducted pursuant to this section to the Interim Finance Committee, or the appropriate subcommittee of the Interim Finance Committee, as directed by the Chair of the Interim Finance Committee, after the report is presented to the Legislative Commission but in no event later than December 31 of the year in which the final report was presented to the Legislative Commission.

6. As used in this section, "at-risk pupil" has the meaning ascribed to it in NRS 387.1211.

Sec. 6.…

Appendix B

Audit Methodology

To gain an understanding of the class-size reduction efforts at CCSD and WCSD, we interviewed staff and reviewed state and federal laws, regulations, and policies and procedures significant to the districts' operations. We also reviewed financial information, prior audit reports, legislative committee minutes, and other information describing the districts' activities. In addition, we documented and assessed the districts' controls related to class-size reduction efforts.

Our audit included a review of the districts' internal controls significant to our audit objective. Internal control is a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved. Internal control comprises the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity. The scope of our work on controls related to district oversight of class-size reduction included the following:

- Exercise oversight responsibility; establish structure, responsibility, and authority (Control Environment);
- Design control activities; implement control activities through policy (Control Activities);
- Use quality information; communicate internally; communicate externally (Information and Communication); and
- Perform monitoring activities (Monitoring).

Deficiencies and related recommendations to strengthen the districts' internal control systems are discussed in the body of this report. The design, implementation, and ongoing compliance with internal controls is the responsibility of district management.

To assess class-size reduction and variance reporting, we obtained CCSD and WCSD reporting recorded near the end of school years 2019-20 through 2023-24, including individual school-level variance requests. We assessed the reliability of class-size reduction and variance reporting by assessing district calculations and reviewing reported values for reasonableness and completeness. We determined the class-size reduction and variance reporting was sufficiently reliable for the purposes of our audit.

We assessed class-size ratio and variance data for changes in values by grade and calculated the prevalence of variances for school years 2019-20 through 2023-24. We also evaluated class-size ratios for compliance with ratios defined in statutes and with district goals and staffing ratios. To understand the process to calculate class-size ratios and variances, we assessed class-size ratio reporting and interviewed district staff and management.

To determine compliance with statutory reporting requirements, we assessed district submission of class-size reduction reporting defined in NRS 388. We determined the existence of reporting by reviewing legislative reporting resources, district websites, NDE reporting, and district reporting. For reporting we could not locate, we followed up with the districts to verify if the reporting was not generated and submitted.

For a population of 231 elementary schools with K-3 at CCSD recorded near the end of school year 2023-24, we selected a judgmental sample of 23 schools based on high class-size ratios reported. From a population of 66 elementary schools with K-3 at WCSD recorded near the end of school year 2023-24, we selected a judgmental sample of 10 schools based on high class-size ratios reported. We obtained individual school-level variance requests for these schools for school years 2019-20 through 2023-24 and assessed these requests for submission compliance, completeness, and duplications.

To further assess the reliability and fidelity of reported class-size ratio data, we compared a sample of district reported class-size ratios to class rosters obtained directly from the schools. Using district records near the end of school year 2023-24, we selected a judgmental sample based on high class-size ratios. We recalculated class-size ratios using school roster information and compared these to district ratios for 36 CCSD K-3 classrooms and 24 WCSD K-3 classrooms. Additionally, we assessed if all teachers reported on school class rosters were licensed, and we reconciled reported teacher numbers between district and school reports. For teacher counts that did not match between the district and school, we assessed district and licensing records, and we interviewed district staff and management to determine the reason for the differences in the counts. To assess the accuracy of school year 2023-24 Nevada Report Card class-size ratios, we compared Nevada Report Card ratios to ratios calculated from school class rosters for the 36 CCSD K-3 class-size ratios.

To determine participation in class-size reduction and variance reporting and understand school-level challenges with class-size reduction, we interviewed 10 CCSD and 6 WCSD school principals at schools with high class-size ratios. We also determined class-size reduction challenges at the district level by reviewing documentation provided by the district and by interviewing district staff. Additionally, we interviewed NDE regarding their challenges with the class-size reduction processes.

To assess the completeness of class-size reduction plans, we obtained annual plans from school years 2019-20 through 2023-24. We reviewed them for statutory compliance, completeness, and the quality of class-size reduction planning. Additionally, we determined if NDE provided guidance or feedback to the districts regarding their plans.

We compiled a list of class-size reduction strategies based on various reports and other information provided to us from the districts. We shared these lists with the districts to confirm their completeness and to obtain further information about the implementation of the strategies for school years 2019-20 through 2023-24. By statutes, the Nevada State Board of Education is required to determine the data that must be monitored by the districts and used to assess the effectiveness of the implementation of district class-size reduction plans. After NDE informed us that this data is the class-size reduction reporting and plan, we primarily assessed the efficacy of class-size reduction strategies by using class-size ratios and variances documented in district reports. To determine if the strategies were effective in class-size reduction, we assessed if the districts reached class-size ratios defined in statutes for K-3.

To assess the relevance of class-size reduction requirements defined in statutes, policy, and guidance, we reviewed statutes, legislative reports, and published research. In addition, we interviewed the districts and NDE to understand their concerns with class-size reduction processes and reporting. We also analyzed historical legislative investments in class-size reduction through review of appropriations bills and State financial information for school years 2013-14 through 2023-24. To further understand district investment in class-size reduction, we reviewed district documentation and interviewed district management. Our analysis included a review of the effects of the PCFP on class-size reduction efforts.

We interviewed the districts and NDE and reviewed statutes and policies and procedures to understand the role of the Nevada State Board of Education and NDE in class-size reduction reporting and oversight. We also reviewed legislative appropriations bills and NDE guidance to determine if recommended class-size reduction strategies aligned.

We used nonstatistical sampling for our audit work, which was the most appropriate and cost-effective method for concluding on our audit objective. Based on our professional judgement, review of authoritative sampling guidance, and careful consideration of underlying statistical concepts, we believe that nonstatistical sampling provided sufficient, appropriate audit evidence to support the conclusions in our report. We did not project exceptions to the populations assessed because our samples were judgmentally selected.

Our audit work was conducted from August 2023 to May 2026. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

In accordance with NRS 218G.610, we furnished a copy of our preliminary report to the districts. We met with district officials to discuss the results of the audit on the following dates: CCSD on July 17, 2026; and WCSD on July 9, 2026, and requested a written response to the preliminary reports. Those responses are contained in Appendix C and Appendix D, which begin on page 36.

Contributors to this report included:

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Appendix C

Response From Clark County School District

Clark County School District

Class-Size Reduction Strategies

Performance Audit #LA26-13 Response

DATE:	July 24, 2026
TO:	Daniel Crossman, Legislative Auditor Legislative Counsel Bureau
FROM:	Jesse Welsh, Deputy Superintendent of Teaching and Learning RoAnn Triana, Chief Human Resources Officer
SUBJECT:	Performance Audit #LA26-13, CCSD Response

Dear Legislative Auditor Crossman and Members of the Legislative Counsel Bureau,

On behalf of the Clark County School District (CCSD or the District), we appreciate the opportunity to respond to the recommendations contained in Performance Audit #LA26-13 regarding Class-Size Reduction Strategies. We value the time and effort invested by the Legislative Auditor's Office in conducting this review and recognize the important role performance audits serve in promoting accountability, transparency, and continuous improvement in public education.

Because the audit evaluated activities occurring between July 1, 2021, and June 30, 2024, the District believes it is important to provide this context in responding to the findings. Where opportunities for improvement have been identified, the District is committed to strengthening procedures, enhancing data quality, and refining reporting processes to ensure continued compliance with statutory requirements while supporting accurate and meaningful reporting. The District also remains committed to working collaboratively with the Nevada Department of Education and other stakeholders to improve the effectiveness and efficiency of class-size reduction reporting.

The following responses outline CCSD's position on each recommendation and the actions the District will take to address the audit findings while maintaining compliance with Nevada law, supporting sound educational decision-making, and minimizing unnecessary administrative burden.

Recommendation #1: *Request guidance from NDE regarding counting substitutes and other teachers needed to be included in class-size ratios to support the completeness, usefulness, accuracy, and consistency of class-size reduction reporting.*

Response: CCSD accepts this recommendation. The District will formally request guidance from the Nevada Department of Education (NDE) regarding the inclusion of substitute teachers and other instructional staff in class-size ratio calculations. Once guidance is received, the appropriate units/divisions (Human Resources Unit, Teaching and Learning, and Assessment, Accountability, Research, and School Improvement) will update procedures, reporting guidance, and staff training to ensure consistent application across all schools and reporting cycles.

Recommendation #2: *Document a procedure for review of class-size ratios to identify schools with high class-size ratios, that includes a quality check of the ratios for accuracy and fidelity in representing class sizes.*

Response: CCSD accepts this recommendation. The District will develop and document a standardized review procedure that includes validation of class-size ratio calculations, quality-assurance checks, and the identification of schools with elevated class-size ratios. The procedure will establish roles, responsibilities,

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July 24, 2026
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review timelines, and documentation requirements to promote accuracy and consistency before reports are finalized.

Recommendation #3: *Enhance class-size reduction policies and procedures to involve schools in district reporting.*

Response: CCSD accepts this recommendation. The District will revise its class-size reduction procedures to incorporate school-level participation in the reporting process. Schools will receive guidance, defined review responsibilities, and an opportunity to verify staffing and class-size information prior to the final district submission. This collaborative process will strengthen data accuracy and accountability.

Recommendation #4: *Ensure reporting required by NRS 388 is submitted to the appropriate entity.*

Response: CCSD accepts this recommendation. The District will review statutory reporting requirements under NRS 388 and establish internal controls, reporting calendars, and assigned ownership to ensure all required reports are submitted to the appropriate entity within the required timeframes. Compliance will be monitored through documented review and approval processes.

Recommendation #5: *Submit a petition as defined in Senate Bill 460 (2025) that requests removal of class-size reduction reporting that is duplicative or does not provide information or data that is used by the districts, NDE, or the Board to support educational outcomes.*

Response: CCSD accepts this recommendation. The District will evaluate current class-size reduction reporting requirements to identify duplicative or non-value-added reporting. If appropriate, the District will prepare and submit a petition in accordance with Senate Bill 460 (2025), working collaboratively with NDE and other stakeholders to support reporting requirements that provide meaningful information while reducing unnecessary administrative burden.

Clark County School District's Response to Audit Recommendations

	Recommendations	Accepted	Rejected
1.	Request guidance from NDE regarding counting substitutes and other teachers needed to be included in class-size ratios to support the completeness, usefulness, accuracy, and consistency of class-size reduction reporting	X	
2.	Document a procedure for review of class-size ratios to identify schools with high class-size ratios, that includes a quality check of the ratios for accuracy and fidelity in representing class sizes	X	
3.	Enhance class-size reduction policies and procedures to involve schools in district reporting	X	
4.	Ensure reporting required by NRS 388 is submitted to the appropriate entity	X	
5.	Submit a petition as defined in Senate Bill 460 (2025) that requests removal of class-size reduction reporting that is duplicative or does not provide information or data that is used by the districts, NDE, or the Board to support educational outcomes	X	
	TOTALS	5	

Appendix D

Response From Washoe County School District

Washoe County School District
425 East Ninth Street * P.O. Box 30425 * Reno, NV 89520-3425
Phone (775) 348-0200 * Fax (775) 348-0304 * www.washoeschools.net

July 10, 2026

Mr. Daniel Crossman, Legislative Auditor
Nevada Legislative Counsel Bureau, Audit Division
401 S. Carson St.
Carson City, NV 98701

Subject: Washoe County School District's Response to Performance Audit Report of Class-Size Reduction Strategies

Dear Mr. Crossman:

The Washoe County School District (WCSD) appreciates the work of the Legislative Counsel Bureau (LCB) to audit class size reduction reporting processes. The District is committed to ensuring that all data submitted to the Nevada Department of Education (NDE) is accurate, transparent, and aligned with state requirements. We accept all recommendations offered by LCB, and WCSD will begin requesting guidance, implementing improvements, and submitting a petition to address the audit recommendations described below.

Recommendation #1: Request guidance from NDE regarding counting substitutes and other teachers needed to be included in class-size ratios to support the completeness, usefulness, accuracy, and consistency of class-size reduction reporting.

District Response
Washoe County School District accepts the audit recommendation. WCSD will request guidance from NDE regarding counting substitutes and other teachers needed to be included in class-size ratios.

Recommendation #2: Enhance class-size reduction policies and procedures to involve schools in District reporting.

District Response
Washoe County School District accepts the audit recommendation. Schools are actively involved in the teacher allocation process from the time preliminary teacher allocations are shared based on projected enrollment, to monitoring projected student enrollment in the spring, to when students arrive in the fall, and to monitoring class sizes after school starts. A District team meets every two weeks, with internal reporting timelines, to monitor enrollment and teacher allocations, and adjust teacher allocations as appropriate based on enrollment. School feedback and input is provided to this group through the area superintendents that supervise the schools.

The LCB audit identified three instances where elementary schools used their teacher allocations for grade levels that were different than what they were intended for. The District will add a step to the allocation process for area superintendents and schools to confirm that schools are using teacher allocations in the same grade level that they were intended for, so that schools can ensure the accuracy of class-size reduction reporting.

Recommendation #3: Ensure reporting required by NRS 388 is submitted to the appropriate entity.

District Response

Washoe County School District accepts the audit recommendation. WCSD will request a reporting template and guidance for the report required by NRS 388.890(6), as identified in the LCB's audit report. We agree with LCB's statement that "it is understandable the districts would expect a template (from NDE) for class-size ratio reporting".

Reporting templates and guidance will help districts and charter schools across Nevada provide complete, useful, accurate, and consistent reporting. Upon receiving the reporting template and guidance from the Director of the Legislative Counsel Bureau, WCSD will ensure reporting required by NRS 388.890(6) is submitted appropriately.

Recommendation #4: Submit a petition as defined in Senate Bill 460 (2025) that requests removal of class-size reduction reporting that is duplicative or does not provide information or data that is used by the districts, NDE, or the Board to support education outcomes.

District Response

Washoe County School District accepts the audit recommendation. WCSD will submit a petition that requests the removal of class-size reduction reporting that is duplicative or does not provide information or data that support education outcomes.

CONCLUSION

WCSD is proud of the strong reporting systems we have built over many years. Our District invests significant time and expertise into ensuring that schools have reasonable class sizes in grades K-3 and that the District meets class-size reduction reporting requirements. We appreciate that LCB's audit report acknowledged these efforts and the extensive labor we invest to do so.

Sincerely,

Tiffany McMaster

Tiffany McMaster
Superintendent

Attachment

Washoe County School District's Response to Audit Recommendations

	Recommendations	Accepted	Rejected
1.	Request guidance from NDE regarding counting substitutes and other teachers needed to be included in class-size ratios to support the completeness, usefulness, accuracy, and consistency of class-size reduction reporting.............................	X	
2.	Enhance class-size reduction policies and procedures to involve schools in district reporting	X	
3.	Ensure reporting required by NRS 388 is submitted to the appropriate entity..	X	
4.	Submit a petition as defined in Senate Bill 460 (2025) that requests removal of class-size reduction reporting that is duplicative or does not provide information or data that is used by the districts, NDE, or the Board to support educational outcomes	X	
	TOTALS	4	