



To: Representative Clyde Shavers, clyde.shavers@leg.wa.gov

Subject: Time and Effort Reduction Ideas for Washington Public Schools

December 18, 2025

Dear Representative Shavers,

At the recent Legislative Forum, we discussed our concerns about the growing weight of unfunded mandates on our schools. Over time, well-intended legislation has steadily made its way into schools and communities. While each requirement may have merit in isolation, the cumulative effect has revealed a deeper issue: the public school system, as currently structured, is no longer aligned with the realities and demands placed upon it.

America's public school system continues to operate within a framework that has remained largely unchanged for more than a century. The 180-day school calendar and a core instructional focus on reading, writing, and mathematics were established during the early development of public education. Historically, this calendar was influenced by an agrarian society, designed to accommodate seasonal labor needs and rural family schedules. While society, workforce demands, and student needs have evolved significantly since that time, the foundational structure of schooling has not.

As expectations placed on schools have expanded through new legislation and agency mandates, the length of the school day, staffing levels, and funding structures have not kept pace. Schools are repeatedly asked to layer additional responsibilities onto an already full instructional day—often without removing outdated practices or providing the time, staffing, or resources necessary to implement new requirements effectively.

Over the past decade, legislative and regulatory additions affecting school culture, operational systems, and teaching and learning have substantially increased the workload of school personnel, particularly principals and administrators. These pressures have been further intensified by rapidly changing societal contexts, increased student needs, and heightened community expectations.

If we are serious about improving outcomes for students, we must be equally serious about examining the structure within which schools operate and reducing mandates that consume time, staff capacity, and instructional focus without delivering meaningful value. True improvement will require not just adding new expectations, but modernizing the system itself to reflect today's educational realities.

Areas for Consideration (No Additional Cost)

High School and Beyond Plan (HSBP) [RCW28A.230.212 High School and beyond -- Substantive Requirements](#)

The intent of the High School and Beyond Plan is sound; however, the mandated reporting software, required training for staff and students, and prescriptive implementation model create unnecessary administrative burden. Rather than requiring a top-down system, the state should provide clear guidance and outcomes while allowing districts to implement the plan using tools already embedded within their existing systems. Flexibility would reduce costs, training demands, and duplication of effort.

Social Emotional Learning (SEL) [RCW 28A.300.477: Social-emotional learning committee.](#)

Social Emotional Learning should not be treated as a standalone mandate with separate reporting and instructional time requirements. Educators already integrate social, emotional, and behavioral supports throughout the school day. Maintaining SEL as a separate requirement forces districts to pull time away from core academic instruction. The state should remove standalone SEL language and the mandatory progress monitoring reports and trust educators to meet student needs through integrated, developmentally appropriate practices.

Beginning June 1, 2021, and annually thereafter, the committee shall provide a progress report, in compliance with RCW [43.01.036](#), to the governor and appropriate committees of the legislature. The report must include accomplishments, state-level data regarding implementation of social-emotional learning, identification of systemic barriers or policy changes necessary to promote and expand social-emotional learning, and recommendations.

Mandatory Seated Lunch and Recess Requirements [B012-25 Seated Lunchtime Rulemaking](#)

Mandated seated lunch and recess requirements would increase staffing needs for supervision and takeaway more instructional minutes, resulting in additional costs. These mandates remove local flexibility and do not account for developmental differences, school schedules, or community context. Schools should retain discretion over lunch and recess structures, including pacing and supervision, without prescriptive state mandates.

Menstrual Equity Mandates [RCW 28A.210.420: Menstrual hygiene products.](#)

The assumption that schools are not already meeting students' basic needs is both inaccurate and dismissive of long-standing district practices. Washington schools have a long-standing history of proactively meeting students' basic needs, including the consistent provision of menstrual products. We can streamline operations by replacing prescriptive statutory

mandates (RCW 28A.210.420) with an approach that honors these existing district practices. Removing redundant compliance obligations allows staff to focus on direct student support rather than documenting services that are already being successfully delivered. Creating new statutory requirements in response to isolated incidents penalizes districts that are already doing the right thing, while adding compliance obligations that do not meaningfully improve student outcomes.

Opioid and Fentanyl Requirements: [RCW 28B.10.578 Opioid and Fentanyl prevention education](#)

In addition, recent regulatory requirements, including mandatory epinephrine training, opioid overdose response medication and training, and the provisions of RCW 28B.10.578 related to opioid and fentanyl prevention education and medication administration carry significant staffing implications. Currently, new regulatory requirements for opioid prevention and emergency response effectively necessitate full-time nursing coverage. To meet these safety standards, our district must bridge a massive funding gap: while the state formula provides for only 1.5 nurses, our local community must fund 8 to ensure student safety. This reliance on local levies to backfill state mandates creates a 'hidden tax' on our students' academic programs.

Attendance Regulations: [Attendance and Truancy Legal Requirements Middle and High School Students](#)

Attendance and truancy requirements for all students, especially middle and high school students, have significantly increased staffing demands, data tracking, and mandated meetings. Expanded BECCA requirements and Community Truancy Board processes frequently require principals and assistant principals to attend off-site court hearings, leaving schools without administrative coverage and pulling leadership focus away from instruction, student support, and daily operations.

For schools to maximize student success and safety, building leaders must remain present and engaged within their school communities. We urge a shift away from court-intensive attendance processes toward locally managed approaches that allow districts greater flexibility to respond to student needs.

Streamlining these requirements would enable districts to:

- **Keep leaders in buildings** by reducing off-site court obligations and allowing administrators to focus on instruction, mentorship, and school operations.
- **Use resources more effectively** by redirecting time and funds toward proactive, school-based attendance interventions.
- **Strengthen community-based solutions** through locally developed supports tailored to students and families.

We respectfully ask that the impact of current attendance and truancy mandates be reconsidered. Schools should be trusted to develop and implement effective attendance strategies within existing resources, without additional requirements that strain already limited capacity.

Purchasing Procurement Thresholds [RCW 28A.335.190](#)

While other local government entities (like cities and ports) saw their limits increased in 2023 and 2024 to adjust for inflation, school district purchasing limits were not included in those specific updates. As of late 2025, there has been ongoing discussion in the legislature about a "Cost of Living" adjustment for these **20-year-old figures**, but as of today, the \$40,000 / \$75,000 limits remain. Our auditors interpret these thresholds when multiple smaller purchases for items are made throughout a year but add up to \$40,000, which can make tracking for various supply categories tedious. This makes the thresholds easy to miss or plan for and leads to more costly audit mistakes. State law is currently more restrictive than federal law.

School Audits [RCW 43.09.2856: School district audits—School district compliance with RCW 28A.150.276 and 28A.505.240—Report of findings.](#)

We propose modernizing administrative requirements to ensure state and local resources are focused where they matter most: student achievement.

1. Performance-Based Audit Cycles [RCW 43.09.2856: School district audits—School district compliance with RCW 28A.150.276 and 28A.505.240—Report of findings.](#)

To maximize taxpayer ROI, we advocate for a "tiered" audit model. Districts with a consistent history of clean audits should be eligible for reduced audit frequency, similar to professional evaluation cycles.

- **The Impact:** Shifting from annual to biennial audits for high-performing districts would immediately redirect \$70,000+ per cycle back to student services.
- **The Solution:** Increase efficiency by leveraging ESD expertise or experienced part-time retirees to conduct reviews. This maintains high accountability while reducing the duration and cost of audits, with provisions for increased oversight during leadership transitions.

2. Procurement Parity & Inflation Adjustment [RCW 28A.335.190](#)

We ask for school district purchasing thresholds to be aligned with the 2023–2024 updates granted to cities and ports.

- **The Impact:** Current \$40,000 / \$75,000 limits have not been adjusted for inflation in 20 years. Aligning these with other local governments and federal standards reduces the risk of technical audit findings caused by outdated figures.
- **The Solution:** Implementing a "Cost of Living" adjustment to these thresholds will modernize the procurement process, allowing business offices to operate with the same agility and efficiency as our municipal partners.

Shifting to Actionable Data: The Smarter Balanced Assessment (SBA) [RCW 28A.300.041: Statewide student assessment system—Redesign—Reports to the legislature.](#)

The current complexity of state graduation pathways has created a significant administrative "drag". For instance, the excessive time required for staff training and student tracking diverts school counselors from their primary mission: fostering mental health, social-emotional development, and meaningful post-secondary planning. In this, WA State prioritizes the processing of requirements over the development of the person.

The SBA, as currently mandated under RCW 28A.300.041, functions as a lagging indicator. Because results arrive after students have moved on, the data is functionally "dead" for the purposes of classroom intervention. To restore systemic integrity and instructional efficiency, we propose:

- Shifting toward formative tools like MAP or i-Ready which provide immediate data to guide student growth.
- Universal application of requirements across charter, private, and public schools to ensure consistent rigor and reporting.
- Streamlining graduation pathways by de-emphasizing the SBA, which serves as a compliance hurdle rather than a meaningful admissions metric for higher education.

10th Grade SBA Requirement

Removing the 10th-grade Smarter Balanced Assessment (SBA) is a zero-cost modernization step that immediately returns valuable instructional time to our high schools. Because current graduation pathways already provide students with multiple ways to demonstrate competency, the 10th-grade SBA has become a redundant requirement. Furthermore, with higher education admissions focusing on GPA and rigorous coursework rather than SBA scores, eliminating this assessment reduces "testing fatigue" and allows students to focus on high-value academic pursuits and career preparation.

Extracurricular Requirements Without Funding [RCW 28A.325.010](#) & [RCW 28A.325.050](#)

While the federal government provides funding to support free and reduced-price meals, the state does not adequately fund extracurricular requirements tied to equity and access. Districts are increasingly reliant on local levies to cover the costs of clubs, sports, and activities labeled as “extracurricular,” despite no accompanying state funding. These expectations should not be imposed without a sustainable funding mechanism.

Purple Star Award Requirements [RCW 28A.625.080](#): [Purple star designation](#).

The Purple Star Award currently requires more than 50 hours of mandated staff training for a district to receive recognition for supporting military-connected students. In an era of reduced staffing and increasing demands, this requirement places districts in an untenable position. Failure to complete the training may unintentionally signal to communities that a district no longer values military families, despite ongoing support and strong partnerships.

Recognition programs should honor and elevate existing practices without imposing extensive professional development mandates. We recommend eliminating the required training hours and allowing districts to continue meaningful collaboration with military partners without additional compliance measures to demonstrate their commitment to military-connected students.

Teacher and Principal Evaluation Program (TPEP) [RCW 28A.405.100](#)

The most common complaint about TPEP is the sheer volume of documentation required, particularly during a Comprehensive evaluation year. Educators must provide evidence for 8 different criteria. In many districts, this involves uploading artifacts (lesson plans, student work, emails, etc.) to an online portal like eVAL. Tracking specific data for "Student Growth Rubrics" requires teachers to show measurable progress for specific subgroups of students over time, taking planning time away from teachers planning lessons to support students and be more effective in the classroom. For principals, TPEP is a massive administrative lift. [A study](#) by OSPI found that nearly **30% of principals** have considered leaving their roles specifically because of the workload associated with TPEP and other administrative duties ([see also](#)).

The Fundamental Course of Study ([RCW 28A.413.060](#))

- This is a mandatory **28-hour course** on the state standards of practice. Districts are required to provide this training to all instructional paraeducators, usually within their first year of hire, provided the state has funded it.

The General Paraeducator Certificate [RCW 19.27A.210](#)

- After completing the Fundamental Course of Study, paraeducators must earn an additional **70 clock hours** of professional development within three years to obtain their General Certificate. This places a significant burden of extra time on the plate of building principals, secretarial staff, and human resources teams.

Washington Clean Buildings Performance Standard (CBPS) [RCW 19.27A.210](#)

We are asking facility owners to tear out functioning equipment to replace with new items to meet this law. The state itself is paying for some of it through grants. Even if a building is relatively efficient, the act of proving it is costly. Districts must conduct audits to identify energy-saving measures which can cost tens of thousands of dollars per building. Compliance requires a "Qualified Person" to develop Energy Management Plans and Operations & Maintenance (O&M) programs. Ongoing benchmarking through tools like *Energy Star Portfolio Manager* creates a permanent administrative workload. Expensive upgrades come from capital funds, if available. Fines must be paid out of the General Fund, which directly impacts school budgets. Construction costs have escalated greatly since 2015 making this a relatively poor time to pay for these new standards.

Expanded Accounting [RCW 28A.320.330](#) [RCW 28A.150.260\(8\)\(di\)](#) [RCW 28A.300.173](#) [RCW 28A.655.110](#)

- **Subfund Accounting:** Districts must track expenditures in subfunds separately to account for each stream of revenue by source. Districts must provide a supplemental expenditure schedule that identifies exactly what objects were purchased for "supplementary enrichment activities" beyond the state-funded amount. Because these subfunds were created to prevent local dollars from backfilling basic education, they are tied to a strict audit process.
- **Object Code Accounting:** Even though the district receives one lump sum per student for MSOC, they must now report how much they actually spent in a variety of categories. This change actually *expanded* what must be reported. This requires additional account coding.
- **Location Accounting:** RCW 28A.300.173 is the primary law requiring building-level transparency of costs. It mandates that the OSPI maintain an internet-based portal of cost on a building basis. This requires districts to include Location coding in their accounting system. Summary: In the last several years, districts have had to add 7 characters to each accounting strand for state reporting purposes.

Electric Bus Transition [RCW 28A.160.260](#)

This one is upcoming and will require new compliance and reporting. School districts are required to purchase zero-emission buses when the Total Cost of Ownership (TCO) is equal to or less than that of a diesel bus. Once OSPI determines that electric buses are cost-competitive in a specific category, they will adjust the state's school bus depreciation schedule. From that point on, the state will only provide reimbursement funding for zero-emission buses in that category. Districts can still purchase diesel or alternative-fuel buses **if they can prove** that a zero-emission bus cannot practically perform a specific route.

After reviewing the many examples above, one message is clear: the cumulative weight of unfunded mandates has become unsustainable for our schools. Each requirement, when viewed in isolation, may appear reasonable. Together, they create a system that diverts time, staffing, and attention away from what matters most, teaching and learning.

If the Legislature is not willing or able to provide the funding and staffing necessary to fully support these expectations, then we respectfully ask that **no additional unfunded mandates be enacted**. At a minimum, we urge lawmakers to pause and reflect on the examples outlined above and ask a critical question: *What can we remove?*

Our schools cannot continue to add without also letting go. It is time to “clear out the closet” to thoughtfully eliminate outdated, duplicative, or low-impact requirements so educators can focus their time and expertise where it has the greatest impact: meeting the needs of students.

Educators know their students, their communities, and their contexts. Trusting their professional judgment and restoring time for teaching, learning, and relationship-building will do far more to strengthen outcomes for children than layering on additional mandates without resources. If you do one thing, let it be this: help us remove the barriers that stand between our educators and the students they serve.

With Appreciation,



Dr. Michelle Kuss-Cybula, Superintendent

Amber Porter, Chief Financial Officer

Dwight Lundstrom, Assistant Superintendent of Student Services

Patrick Harrington, Assistant Superintendent of Human Resources