

**PASCO SCHOOLS RESPONSE TO LOWER COST  
REGULATORY ALTERNATIVE SUBMITTED BY:**

**Missy Cook, Frederick M. Stahl, Melissa A. Alexander, Anthony Maio,  
David J. Steadham, Jare B. Pearson, Stephanie E. Doolittle**

An alternate statement of regulatory cost was submitted by the above named individuals on March 19, 2018, and is available for viewing at <http://www.pasco.k12.fl.us/planning/rezoning/>. The following is the District's response thereto:

I. The assertions regarding the District's Statement of Estimated Regulatory Cost are rejected. The District's Statement of Estimated Regulatory Costs has been published and is available for viewing at <http://www.pasco.k12.fl.us/planning/rezoning/>. More specifically, with regard to each section of the Alternative Statement, the District's response is as follows:

1(a) Additional Transportation Costs

**The assertions regarding additional transportation costs, whether such constitute regulatory costs and financial impacts asserted therein, are rejected as speculative. The assertions regarding the transportation costs are addressed in the District's statement of estimated regulatory costs.**

1(b) Lower Property Values – Distance

**The assertions regarding the impact on property values, whether such constitute regulatory costs and the financial impacts asserted therein, are rejected as speculative.**

1(c) Lower Property Values – School Grades

**The assertions regarding the impact on property values, whether such constitute regulatory costs and the financial impacts asserted therein, are rejected as speculative. As the District stated in its Statement of Estimated Regulatory Costs, "As with all Pasco County District public schools, each school subject to the revised attendance boundaries is operated to perform the School Board's State Constitutional and statutory obligation to provide 'a uniform, efficient, safe, secure, and high quality system of free public schools that allows students to obtain a high quality education and for the establishment, maintenance, and operation of institutions of higher learning and other public education programs that the needs of the people may require.'" The schools subject to the rezoning in the present are no different, and each is operated to satisfy the foregoing statutory and constitutional obligations.**

1(d) Lower Property Values – Lost Taxes

**The assertions regarding the impact on property values, whether such constitute regulatory costs and the financial impacts asserted therein, are rejected as speculative.**

**1(e) Litigation Costs and Damages**

**The assertions regarding the cost of threatened litigation, and whether such are regulatory costs, are rejected as speculative.**

**Any additional alternatives that are received will also be posted at the District website under the rezoning section at <http://www.pasco.k12.fl.us/planning/rezoning/>.**

II. The assertions of the above-referenced Lower Cost Regulatory Alternative are rejected for reasons that follow:

**The portion of the Lower Cost Regulatory Alternative that addresses the earlier construction of new wings or reliever schools was rejected because it is not a lower cost alternative and does not substantially accomplish the objectives of sections 1001.41 and 1001.42, Florida Statutes. There are no budgeted funds to “immediately begin design and construction of (a) new wings at the MHS or SSMS campus... and/or (c) the new high school north of S.R. 54....” District funds have been budgeted for the Starkey K-8 which is currently projected to open in August 2021. Even if such funds were available for all identified projects, the typical time for construction would make any resulting relief at least three years from date commenced, and rezoning would still be required to distribute students among the then existing schools. Additionally, the School Board’s long term existent capital plans address needs through the entire School District which encompasses all of Pasco County, Florida, not just the subject area in West Pasco County. Given the uncertainty of state funding for capital improvements, the relief under the proposed rezoning plan provides short term relief to school capacity, and is consistent with the longer term capital budget plan of the School Board. The Alternative offers no solution to address current overcrowding at the subject schools or more consistent utilization of District facilities.**

**The portion of the Lower Cost Regulatory Alternative that addresses double sessions was rejected because it is not a lower cost alternative and it does not substantially accomplish the objectives of sections 1001.41 and 1001.42, Florida Statutes. While scheduling *double sessions* in schools is an available option historically utilized by the District to relieve the short term impacts of rapid growth, school capacity and student overpopulation, such would cause the District to incur substantial costs for additional allocations for administrative, instructional, and support staff, as well as the creation, planning, and staffing of additional transportation routes that would**

otherwise not be required in the absence of such. Additionally, after considering the available capacity in other surround schools within the area, double sessions is not a preferred utilization of existing District resources.

The portion of the Lower Cost Regulatory Alternative that addresses “administrative rezoning” was rejected because it does not substantially accomplish the objectives of sections 1001.41 and 1001.42, Florida Statutes. Administrative rezoning would not address overcrowding at the subject west side schools.

The portion of the Lower Cost Regulatory Alternative that addresses “meaningful address verification” was rejected because it is not a lower cost alternative and does not substantially accomplish the objectives of sections 1001.41 and 1001.42, Florida Statutes. There has been no evidence provided to demonstrate that the current levels of school overcrowding in the impacted schools are the result of misrepresentations of student resident addresses. As such, the assertion of this as a cause of the underlying overcrowding is speculative. Student population data shows an annual increase in students of approximately five (5) percent. Moreover, notwithstanding any potential merit to the program utilized in the Broward County School District, the proposed enhanced address verification represents a cost increase to the School Board regarding software licensing, and additional investigative and staffing costs to enforce address verification and student assignment. The Alternative fails to identify funds to implement such an enhanced “address verification” procedure, and there is no indication that such a policy would address, or substantially reduce, overcrowding at the subject west side schools. Unconnected to the proposed rezoning process, the School District has existing procedures which require parents to authenticate and corroborate resident address for students enrolling into Pasco Schools. (Additional information regarding this matter is available at [http://www.pasco.k12.fl.us/comm/registration requirements](http://www.pasco.k12.fl.us/comm/registration_requirements)). Under the existing procedure, enrolling students are required to provide documentation to corroborate residential address information, and when suspected, claims of violations are referred to law enforcement for criminal investigation as appropriate, at no cost or expense to the School Board. Moreover, the School Board’s existing procedures are consistent with, and sensitive to, applicable Federal Laws (e.g., the McKinney-Vento Act, 42. U.S.C. 11301 et. Seq.), and with the financial and staffing resources available within the District.