

**NEVADA DEPARTMENT OF EDUCATION
COMMISSION ON PROFESSIONAL STANDARDS IN EDUCATION
JANUARY 19, 2022
9:00 AM**

Office	Address	City	Meeting
Department of Education	2080 E. Flamingo Rd.	Las Vegas	Room 114
Department of Education	700 E. Fifth St.	Carson City	Board Room
Department of Education	Livestream	n/a	<u>Link</u>

(Video Conferenced)

COMMISSION MEMBERS PRESENT:

In Las Vegas:

Commissioner Belknap
Commissioner Carvalho
Commissioner Roberts
Commissioner Wenger

In Carson City:

President West-Guillen
Commissioner Stokes
Commissioner Tucker

COMMISSION MEMBERS NOT PRESENT:

Commissioner Davis

DEPARTMENT STAFF PRESENT:

In Las Vegas:

Mike Arakawa, Chief Compliance Investigator, Office of Educator Development, Licensure, and Family Engagement
Anabel Sanchez, Education Programs Professional, Office of Educator Development, Licensure, and Family Engagement
Martha Warachowski, AA IV, Division of Educator Effectiveness and Family Engagement

In Carson City:

Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement
Dylan Fuson, AA III, Nevada State Board of Education

Virtually:

Cindi Chang, Education Programs Supervisor, Office of Career Readiness, Adult Learning, and Education Options

LEGAL STAFF PRESENT

Deputy Attorney General David Gardner (Virtually)

AUDIENCE IN ATTENDANCE:

In Las Vegas: None

Carson City: None

Virtually: None

1. CALL TO ORDER; ROLL CALL; PLEDGE OF ALLEGIANCE

President West called the meeting to order at 9:05 a.m.
Roll call attendance was taken as reflected above and quorum was established.
The Pledge of Allegiance was led by Commissioner Stokes.

2. PUBLIC COMMENT #1

Kim Reddig, Nevada Speech-Language-Hearing Association, *submitted a written public comment regarding proposed amendment to NAC 391.036 (A complete copy of the statement is available in Appendix A).*

3. APPROVAL OF AUGUST 18, 2021, MINUTES

Motion: Commissioner Stokes moved to approve the August 18, 2021, minutes. Commissioner Wenger second the motion. **Motion carried unanimously.**

4. PRESIDENT'S REPORT

President West thanked everyone for their attendance.

5. SECRETARY'S REPORT

Jeff Briske noted that the 2022 meeting schedule has been posted and asked everyone to mark their calendars for future meetings. Mr. Briske stated that in order to accommodate a 30-day posting for a public hearing, he requested to move the February 16 meeting to the following week. He suggested the following days and times: February 22, February 24 or February 25. Commissioner Stokes stated he would prefer February 24.

Mr. Briske asked if anyone opposed moving the February 16 meeting to February 24 and there was none. Mr. Briske stated they will move the February 16 meeting to February 24 at 9:00 a.m.

Mr. Briske introduced Anabel Sanchez, the new Education Programs Professional over educator preparation review and approval, professional development, Title II HEA reporting, state Praxis testing coordinator and several grants for educator preparation. He stated she is his replacement in his former position at NDE and is off to a great start. Mr. Briske asked Ms. Sanchez to say a few words and introduce herself.

Anabel Sanchez stated she is pleased to be there working with the COPS commission and is excited to see what they can come up with together and how they can collaborate to make changes in their educational system. Ms. Sanchez said she was a 5th grade teacher at C.C. Ronnow Elementary four months ago and had been there for 12 years. She told her students if she ever left the classroom, it was to make a difference for them and said that is what she's trying to do here. Ms. Sanchez said she is always available for any questions and/or input they need from her and looks forward to working with everyone.

6. ALTERNATIVE ROUTE TO LICENSURE PROGRAM RENEWALS

Jeff Briske stated this item has been delayed due to incorrect information on the application for renewal. Western Governors University (WGU) has submitted the corrected application and is seeking renewal of their ARL program in the areas of Elementary and Secondary: Biological Science, Math, Language Arts, and to teach out current Social Studies candidates. It is the recommendation of the ARL review team to renew WGU's ARL program until July 2024.

Motion: Commissioner Carvalho moved to approve renewal of Western Governors University's ARL program until July 2024. Commissioner Stokes seconded. **Motion carried unanimously.**

7. 9:05 A.M. WORKSHOP TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.120 - QUALIFICATIONS FOR LICENSE AND QUALIFICATIONS FOR LICENSE WITH ENDORSEMENT IN CAREER AND TECHNICAL EDUCATION; NAC CHAPTER 391.125 - ENDORSEMENT FOR RECOGNIZED FIELD OF TEACHING, FIELD OF SPECIALIZATION OR AREA OF CONCENTRATION; NAC CHAPTER 391.1312 - REQUIREMENTS AND RESTRICTIONS ON HOURS OF CREDIT FOR CERTAIN SUBJECTS; NAC CHAPTER 391.252 - CORPS PROGRAM; AND NAC CHAPTER 391.315 - ENDORSEMENT TO SERVE AS SCHOOL PSYCHOLOGIST: GENERAL QUALIFICATIONS AND RENEWAL.

Jeff Briske opened Public Workshop for Regulation 113-20 affecting NAC 391.120, 391.315, 391.1312, and 391.252.

Mr. Briske asked Board Secretary Dylan Fuson if there is any public comment submitted via email regarding this item, and Mr. Fuson replied none at this time. Mr. Briske asked if there were any public comments in the south or north and there were none.

Mr. Briske stated this regulation was drafted by the Office of Educator Development, Licensure, and Family Engagement (EDLiFE) to ensure conforming language in the Nevada Administrative Code (NAC). Stakeholders included Office of Career Readiness, Adult Learning, and Educational Opportunities (CRALEO).

Mr. Briske stated the following:

- Section 1(2) near the bottom of page one affecting NAC 391.120 adds the language “or career cluster” allowing a person to obtain a secondary license with an endorsement in Career and Technical Education who has a bachelor’s degree that is aligned to a subject area or career cluster.
- Section 1(3) near the bottom of page 2 affecting NAC 391.120 removes 8 additional semester hours of course work in lieu of student teaching as this is not affecting current practice.
- Section 3 at the bottom of page 3 affecting NAC 391.315 is an update with conforming language of: “master’s or more advanced” degree; “regionally” accredited institution, and on page 4; and “or its successor organization x2.
- Text repealed for NAC 391.1312 is archaic preparation programing language not in current practice.
- Text repealed for NAC 391.252 has been moved to the Business & Industry (B&I) regulation.

Mr. Briske stated he is available for questions and is joined by Cindi Chang, Education Programs Supervisor from the Office of Career Readiness, Adult Learning, and Education Options.

Commissioner Wenger asked on 391.125, who would determine if it’s an originally accredited institution.

Mr. Briske replied as preparation programs go through the education preparation approval process with the State, they need to show their accreditation. There is a future regulation in process that would allow additional accrediting bodies, such as CAEP and AAQEP, to determine if they are accredited.

Mike Arakawa stated the U.S. Department of Education maintains a database of all accreditations for colleges and universities throughout the country that they refer to in order to verify accreditation.

Motion: Commissioner Stokes moved to approve moving Regulation 113-20 to Public Hearing. Commissioner Belknap seconded. **Motion carried unanimously.**

Mr. Briske closed the Public Workshop for Regulation 113-20.

8. SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.036 - TESTS OF COMPETENCY REQUIRED FOR INITIAL LICENSE, EXEMPTIONS, AND FAILURE TO COMPLY; NAC CHAPTER 391.170 - LICENSE OR ENDORSEMENT AS PROFESSIONAL ADMINISTRATOR OF SCHOOL AND ENDORSEMENT AS PROFESSIONAL ADMINISTRATOR OF PROGRAM; NAC CHAPTER 391.420 - BUSINESS AND INDUSTRY ENDORSEMENT, PROGRAM AREAS FOR WHICH ENDORSEMENT MAY BE ISSUED; AND NAC CHAPTER 391.425 - BUSINESS AND INDUSTRY ENDORSEMENT, QUALIFICATIONS FOR RECEIPT AND FIRST RENEWAL.

Jeff Briske opened Public Workshop for Regulation 114-20 affecting NAC 391.036, 391.170, 391.420, and 391.425.

Mr. Briske asked Board Secretary Dylan Fuson if there is any public comment submitted via email regarding this item, and Mr. Fuson replied none at this time. Mr. Briske asked if there were any public comments in the south or north and there were none.

Mr. Briske stated this regulation was drafted by the Office of Educator Development, Licensure and Family Engagement (EDLiFE) at the request of stakeholders. Stakeholders included the Office of Career Readiness, Adult Learning, and Education Options (CRALEO), University of Nevada, Reno (UNR), University of Nevada, Las Vegas (UNLV), Clark County School District (CCSD) teacher apprenticeship program, and in consultation with participants at the National Association of State Directors of Teacher Education and Certification (NASDTEC), and Ted Andrews Winter Symposium (TAWS) for Education Preparation (2018).

Mr. Briske stated the following:

- Section 1(3)(c) which begins near the middle of page 2 of this regulation affecting NAC 391.036 will allow additional testing pathways using the ACT or SAT test in lieu of Praxis core requirements.
- Section 2(1)(a)(2) at the top of page 5 affecting NAC 391.170 will allow for additional pathways of teaching and administrative experience to obtain an administrative endorsement.
- Section 3(2) at the bottom of page 6 affecting NAC 391.420 will allow Business & Industry license holders to add the following endorsements to their license:
 - Advanced Computer Science
 - Cultural Competency or specialist in cultural competency
 - English Language Acquisition and Development, and/or
 - Social Emotional and Academic Development endorsements

Mr. Briske stated he would also like to add to the Public Workshop an Introductory Computer Science endorsement that would be available to these license holders.

Mr. Briske stated the following:

- Section 4(2) on the bottom of page 7 affecting NAC 391.425 will allow additional pathways, in lieu of work experience, for a currently licensed B&I or CTE teacher to add additional B&I endorsements using:
 - Two years of teaching experience and recognized certification, or
 - A workforce competency credential issued by the National Occupational Competency Testing Institute (NOCTI), or its successor organization, related to the area of endorsement for which they are applying
- Section 4(7) in the middle of page 10 also affecting NAC 391.425 will not require a teacher who adds an additional B&I endorsement to take 12 semester hours or coursework or professional development as required in sub paragraph 5 because this is already a requirement for their original license

Mr. Briske stated he is available for questions and is joined by Cindi Chang, Education Programs Supervisor from the Office of Career Readiness, Adult Learning, and Education Options.

Commissioner Carvalho asked Mr. Briske to explain the rationale behind the motivation for these amendments.

Mr. Briske replied he would be happy to speak on the ones in his office and turn it over to Ms. Chang to speak on the ones in her office.

Mr. Briske stated for Section 1(3)(c) allowing additional testing pathways using the ACT or SAT test in lieu of Praxis core requirements, this was a request from their stakeholders. The ACT and SAT measure basic competencies in the areas of Math, Reading, and Language, and that would be measuring the same type of basic competencies of the Praxis core requirements. This allows an additional pathway if a teacher candidate scores a 21 in the ACT and 1100 on the SAT, they would not have to take the Praxis core because it is measuring the same type of information.

Mr. Briske stated for Section 2(1)(a)(2) allowing additional pathways of teaching and administrative experience to obtain an administrative endorsement, currently those candidates must have five years of teaching experience before they can obtain an administrative license. A few years ago, they added a reciprocal administrative license. In some other jurisdictions, teaching experience is not required, but they would have

five years of administrative experience. This proposed regulation would allow candidates to have five years of teaching experience, five years of administrative experience or a combination of both, allowing additional pathways for those who would like to obtain an admin license.

Mr. Briske turned it over to Ms. Chang to address the other sections.

Cindi Chang referred to the sections pertaining to teaching Advanced Computer Science and adding in the Introductory Computer Science. Ms. Chang stated they have many teachers who have a Business and Industry license that would like to add the Advanced Computer Science endorsement to that license. The way it was previous written prohibited them from doing so. Regarding the Introductory Computer Science endorsement, this was a minor change that opens that opportunity for all K-12 educators to be able to teach Computer Science. Additionally, those that currently hold a Business and Industry (B&I) license who are asking to get an additional endorsement, the wording prohibited that because they were currently in the classroom teaching but needed additional requirements that would pull them from their teaching assignment. This allows for that teaching assignment to be recognized as industry experience. This change also says that holding a recognized industry certification for the additional endorsement that they want to add is beneficial to ensure that they have the qualifications that they need before adding the endorsement or having a Department of Workforce competency credential in that endorsement area would count as well. For those individuals obtaining an additional B&I endorsement to their existing B&I license, they should be exempt from the 12 semester hours requirement because they would have, in theory, received those with their first endorsement. The goal here is in tidying up this language in the NAC.

Commissioner Carvalho thanked them for the explanation and stated it sounds like the amendments are all focused on streamlining the process and adding additional pathways, which gives them more educators. She asked if she's missing anything that would increase requirements for educators or is it just to streamline the process.

Mr. Briske replied it's to streamline the process allowing additional pathways and not creating any additional barriers.

Commissioner Tucker asked about the administrator section related to the five years combined teaching and being an administrator, if an individual can become an administrator without any years of teaching.

Mr. Briske replied yes and stated the reason they allow that is they have administrators coming from other jurisdictions who would like to be an administrator in Nevada and some of those jurisdictions may not have required teaching as a requirement. The proposed regulation will offer that as an additional pathway if they already have administrative experience. For example, they had one candidate who had been a principal for 12 years and a superintendent for three years but did not have any teaching experience, they wanted to grant him an administrative license.

Commissioner Tucker said she understands that but as a teacher she definitely wants someone who has been a teacher as an administrator to understand what she's gone through and do go through every day.

Commissioner Belknap echoed Commissioner Tucker's comments. Mr. Belknap asked if there's a shortage of administrators in the state of Nevada.

Mr. Briske replied he did not have that information but he can get it for him at a future meeting if the Commission would like to have that.

Commissioner Belknap stated he would like to have that because opening up pathways to make it easier to become a teacher is the right thing to do seeing that they're in a national teacher shortage. The last thing they need is more hoops for educators, people on the frontlines, to get into the classroom. From his experience, there is no shortage of people wanting to become administrators in the state and at least they've had the requirements of having to teach in their schools for five years. He is very hesitant to approve this because if

they don't have the experience in the classroom, how are they going to know how to run a school. They're very different from other states and teaching is teaching, but he believes experience is very necessary.

Commissioner Wenger stated she would also like to echo the comments made by Commissioner Tucker and Commissioner Belknap. She stated points 1 and 2 would cover the scenario that Mr. Briske brought up about somebody having 12 years' experience as an administrator in another state, which covers the five years of administrator experience; however, she does not feel point 3 is necessarily needed, and she would not approve this as written.

Commissioner Roberts stated she also agreed with that. She thinks one of the biggest responsibilities a principal has is supervision of instruction, and if they have not been in the classroom, it's very hard for teachers to trust and accept that they don't have that experience that they're going through, so she does not agree with them not having any experience teaching.

President West responded in reference to the public comment submitted by Kim Reddig, his understanding of speech pathology requirements as proposed will be addressed in a regulation that will be brought forward in the coming months and is not specifically addressed in this proposal.

President West thanked the Commissioners for their comments. This is why they do these workshops, so they have an opportunity to provide this level of input prior to the actual public hearing.

Commissioner Carvalho stated she agreed with the comments that were made and is interested in knowing if there is a shortage of administrators, but her real concerns are in the rural areas. She asked would they be harming their administrators in the rural areas, and if that's the case, maybe they can make an exception or alter the language. Commissioner Carvalho asked how does it work procedurally, and if they are concerned about this provision, should they try and alter the language today or do they have a public hearing based on the existing language. She stated they should move forward with this and keep their concerns in mind.

Mr. Briske stated it's up to the Commission how they would like to word this. This is the time to do the language before it gets sent back to LCB for public hearing. He stated it sounds like they have a couple of options and referred the Commission to the top of page 5. He stated one option he heard was allow this for only the rural districts for the combination or teaching or admin experience. He stated another option he heard was completely take it out and make sure they require teaching experience. He agrees with moving this forward, but recommended working on how they would like the language at this time. Mr. Briske asked if Mr. Arakawa had any suggestions.

Mr. Arakawa stated one option that the Commission has at this point is to remove that section from the regulation as written and move the rest of the regulation forward which would allow more time to better address that language thoroughly than trying to figure it out today.

Commissioner Belknap stated he was going to recommend that if they weren't able to edit what the regulation changes were, for him to vote yes on this if it had the administrative piece in it, it would have to have five years of teaching experience. He stated it's important to all of them who are frontline educators to have their administrators who are their chief instructional coaches on campus to actually be able to tell them how they taught and how to best learn from their experiences, and they can't tell them that if they haven't taught themselves. He stated that his vote would be no on this if they keep it as is, but if they leave it as five years of teaching experience as a licensed teacher in a program of early childhood education, Kindergarten, or grades 1 through 12, he would be happy with that to move it forward, or if they want to omit it for now and move the rest forward, he is fine with that.

Commissioner Tucker stated she is also very hesitant to vote for anything not requiring teaching experience. She would be willing to vote yes on something that said if it were an emergency in a rural area, but she truly believes if they want the best administrator for Nevada schools, they would have to have teaching experience.

President West suggested referring proposal 114-20 for a public hearing after removing Section 2 of the proposed regulation which would allow staff to get more information on the demand side of the administrator piece and then bring that back at a later date. He asked would that satisfy the concerns of the Commission.

Commissioner Roberts asked if the current rule states they need five years of teaching experience, and Mr. Briske replied yes, that is how the current regulation reads.

Commissioner Roberts asked if all they are changing is that they can have administrative experience or a combination thereof, and Mr. Briske replied that is correct.

Commissioner Carvalho stated it was a great idea to take out Section 2 and move forward with this, but she does not want to see this issue forgotten because there's probably a reason why they are considering this. She believes it may be in the rural areas, and she does not want to harm anyone. She asked the Department to continue to gather information on administrator shortages in Nevada, particularly in the rurals because she does not want to see them doing anything to make it more difficult for rural educators.

Commissioner Roberts stated she used to work in a rural district as a principal and one of the things that they did with some of their principals is they would teach part of the time and be an administrator part of the time where they still had that experience for necessity sake but also to give those who are leaders that option to start moving up.

President West stated these are all very good conversations, and they've provided enough direction to staff that they can bring Section 2 back to them at a later date for more discussion and analysis.

Motion: Commissioner Belknap moved to approve moving Regulation 114-20 to Public Hearing with the removal of Section 2. Commissioner Wenger seconded. **Motion carried unanimously.**

Mr. Briske closed the Public Workshop for Regulation 114-20.

9. 9:15 A.M. WORKSHOP TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.627 – ANNUAL TRAINING ON CODE BY SCHOOL DISTRICTS AND CHARTER SCHOOLS.

Jeff Briske opened Public Workshop for Regulation 117-20 affecting NAC 391.627.

Mr. Briske asked Board Secretary Dylan Fuson if there is any public comment submitted via email regarding this item, and Mr. Fuson replied none at this time. Mr. Briske asked if there were any public comments in the south or north and there were none.

Mike Arakawa, Nevada Department of Education, conducted the Public Workshop for Regulation 117-20 affecting NAC 391.627 and provided some background for Commissioners relatively new to their positions. He stated in 2017, the State Legislature passed Assembly Bill 124, which had a couple of requirements. The first requirement was that the Commission adopt a Code of Ethics for Nevada educators. The second requirement was that once that Code was adopted, districts would provide training to educators on a regular basis on that Code of Ethics. The third thing it did was create an Advisory Group to look at options for a Code of Ethics to be adopted and to make recommendations to the Commission, and Mr. Arakawa was chosen to facilitate that Advisory Group. The recommendation from that group to the Commission was that the Commission adopt the Model Code of Ethics for Educators (MCEE), which is maintained on the website for the National Association of State Directors of Teacher Education and Certification (NASDTEC).

Mr. Arakawa stated the Code was created by a multidisciplinary group across the country that included professional ethics experts, educators, administrators, and various people within the field of education. With that recommendation, the Commission looked at the Model Code of Ethics and adopted it in June 2019. The changes to this regulation are revisiting the training component of the requirements in statute to provide some clarification as to what sort of training might be provided to educators to provide some options for that training. The existing portion of NAC 391.627 said that the Board of Trustees and the governing body of each

charter school must on an annual basis provide training on the Model Code adopted by the Commission to teachers, administrators, and other persons employed by a school district or a charter school pursuant to NRS 391.2056, which is the part that was brought in by Assembly Bill 124 in 2017.

Mr. Arakawa stated the training should directly align to the areas of responsibility identified within the Nevada Model Code of Ethics for Educators and be made available to all persons affected during their regular working hours. They envision this being a part of ongoing professional development. A teacher, administrator or other person affected shall be considered to have completed the training required by the statute if he or she successfully completes professional development in whatever form that satisfies the requirements of subsection 2; if they complete a course offered by NASDTEC called Prevention and Correction Overview, they would be considered to have completed their training for that year. The same for any coursework offered by a regional accredited college or university that aligns to the Model Code. There is a requirement in statute that everyone completing training signs a written acknowledgement that goes into their employment file.

Mr. Arakawa stated that in paragraph 4, it describes some options as to where the training may be obtained. A school district could create and provide that because it is ultimately in statute the responsibility of the school districts to ensure that the training occurs. There are organizations across the country that have developed training in this regard and will make that training available to individuals who belong to state educational organizations and some of those do it for free that is facilitated through NSEA. If the regional professional development programs wanted to develop in conjunction with school districts, universities, or whoever else, that would be a wonderful alternative because that is what they do. The last thing is the Department reserves the right to audit and make sure the training is occurring. They don't foresee checking everybody's record to make sure they're doing that, but if there were a question about an individual's record, they can review and verify.

Mr. Arakawa stated he would be happy to entertain any questions anyone may have.

Commissioner Belknap asked with this training, is it an annual ongoing training that they have to take every year or is this a one-time thing.

Mr. Arakawa replied this would be ongoing training. He said the rationale behind that would be the training can build on prior training and develop new levels of complexity in an ongoing conversation, and it works best if it is addressed that way. There was a wonderful program that Educational Testing Service had called the ProEthica program. It was originally one of the options they had written into this regulation but it has since been discontinued. The Commissioners who were serving at the time of the original discussion and the focus group felt the options were good and they need to have some so that if people are obtaining training other than through the district, that would still count.

Commissioner Belknap thanked Mr. Arakawa and stated he had some follow-up questions. He asked do the individual school districts have to make some type of training per this regulation to provide to educators cost-free. Mr. Arakawa stated that is correct. The initial language within the statute was that it was the responsibility of the districts to provide training in this regard to their staff.

Commissioner Belknap thanked Mr. Arakawa and stated the last thing they need to do is provide more costs on educators. It already costs them more to keep their licenses as it is and to have this sprung on educators, especially in the current times, can be very challenging. The other options are great. Those national organizations and the discounted programs are fine, but they have to remember over 18,000 of their educators are no longer a part of NSEA and are not able to access those programs as easily, so they have to keep that in mind and provide services to all of their educators.

Mr. Arakawa thanked Commissioner Belknap and said that was very much a topic of discussion throughout the conversation, trying to figure out ways they can do this without imposing additional costs on people, given the resources that were available.

Commissioner Tucker asked can this be required outside of contract time to take, and Mr. Arakawa replied they specifically put into paragraph 2 that the training that is required must be made available to everyone who is affected during the regular working hours of the employee, so that would be a requirement that it be provided during contract time if the district is providing it.

Commissioner Tucker stated every year teachers have to take the online trainings and asked if they can add to that and guarantee that these be given during their contract times because in the past, they've been told they have to take them whether it's on their time or not.

Mr. Arakawa stated it sounds like what Commissioner Tucker is asking about is more a policy or practice question as far as what the districts will do internally. The requirement is that the training must be made available to everyone who is required to take it during their contracted workday.

Commissioner Stokes asked Mr. Arakawa since he has mentioned several programs by name, is there a given amount of time that's expected to be spent in training or a number of credits. For example, as mentioned by some of the other speakers, they have a relationship with a Nevada insurance pool who provides for them annual workshops for specific topics that are already in statute. If they were to ask these folks to build a similar type of training for their district and other districts that belong to the Nevada insurance pool, they would need to know if there is an expectation on the amount of time, credits or some other specific that might help them meet this requirement.

Mr. Arakawa stated there is no specific requirement as to how long must be spent in this training. It's an unspoken expectation, but it would be sufficient to allow coverage of the subject at hand to the point where people understand what they're being instructed in. He added that they did speak to representatives of the insurance pool Mr. Stokes spoke about while the Advisory Group was meeting, and they did consider them as a possible avenue to create and provide the training. He stated they were hesitant to enter into that, but if the district has better luck than the advisory group did in addressing it with them, then they should pursue it.

President West asked if there were any other questions on the proposed regulation, and there was none.

Motion: Commissioner Belknap moved to approve moving Regulation 117-20 to Public Hearing. Commissioner Stokes seconded. **Motion carried unanimously.**

Mr. Briske closed the Public Workshop for Regulation 117-20.

10. FUTURE AGENDA ITEMS

Jeff Briske stated a possible future agenda item is a Public Hearing on the emergency sub permanent regulation. Mr. Briske said when the pandemic started, the Governor put forward an emergency regulation that did expire. The Department later brought a temporary regulation allowing emergency substitute teachers from all districts, which also expired on November 1st and they are hearing from the field that there is still quite a great need for substitute teachers to fill empty classrooms. This is one of the reasons he asked earlier to move the February meeting back one week to allow a 30-day public notice to hold this public hearing regarding that emergency sub permanent regulation that they already moved out of workshop.

Mr. Briske stated another future agenda item is a Public Workshop for the Administrative and Teacher mentorship endorsements. He said this was brought from the field where there is great interest in providing additional endorsements, not required, but additional options for administrators who would like additional training in that area and also for teachers as a type of career ladder for coaching and mentoring future teachers and teachers who are new to the profession.

Mr. Briske stated another future agenda item is a Public Workshop for the regulation updating testing requirements for Other Licensed Educational Personnel. This was public comment that was heard a few moments ago regarding nurses, speech-language pathologists, mental health and social workers. He believes they may have that workshop ready for them at the February or March workshop, but they're aiming for February, to address the testing requirements for that group of educators.

Mr. Briske stated another future agenda item is a Public Workshop on Regulation 115-20, a regulation updating the Department approval process of Traditional and ARL education preparation programs. The state approves teacher preparation program, and this regulation would bring those in alignment and up-to-date.

Mr. Briske stated another future agenda item is a Public Workshop for regulation per AB225 in the last session, allowing alternative measurements of competency in lieu of the Praxis Core test for educators hoping to remove some barriers.

Mr. Briske stated another future agenda item is a Public Workshop for regulation per SB352, which will allow classroom support staff to complete an accelerated program of student teaching while remaining employed.

Mr. Briske stated another future agenda item is an approval of Praxis competency tests that have been regenerated and updated by their Educational Testing Service. He will invite their Client Relations Director to come to that meeting to explain that process, what tests have been updated and if any test scores have been adjusted, they will need adoption from this body.

Mr. Briske stated he heard from today's meeting that the Commission would like information on the statewide admin shortage, so he will research that and bring it to a future meeting as well.

Mr. Briske asked if there were any future agenda items the Commissioners would like to propose and there was none. He stated that if at any time, they do have a future agenda item to please reach out to him directly, so they can place it on a future agenda.

11. PUBLIC COMMENT #2

1. Nancy Kuhles, Nevada Speech-Language-Hearing Association (NSHA)/NV Coalition Co-Chair, *submitted a written public comment regarding personnel shortage in Special Education and related services (A complete copy of the statement is available in Appendix A).*
2. Kate Schum, Washoe County School District, Human Resources Manager, *submitted a written public comment regarding NRS 391.2056 (A complete copy of the statement is available in Appendix A).*

12. ADJOURNMENT

The meeting adjourned at 10:12 a.m.

APPENDIX A: STATEMENTS GIVEN DURING PUBLIC COMMENT

1. Kim Reddig, Nevada Speech-Language-Hearing Association, submitted public comment regarding proposed amendment to NAC 391.036.
2. Nancy Kuhles, Nevada Speech-Language-Hearing Association (NSHA)/NV Coalition Co-Chair, submitted a written public comment regarding personnel shortage in Special Education and related services.
3. Kate Schum, Washoe County School District, Human Resources Manager, submitted a written public comment regarding NRS 391.2056.

Item A1, Kim Reddig

To whom it may concern:

The Nevada Speech- Language Hearing Association would like to comment on the competency test that is required to obtain initial licensure with the NDE for teaching students with speech- language impairment. Current language and requirements create employment barriers for school districts to hire more experienced professionals that may have begun their careers in a setting other than the school building. Speech-language pathologists hold a master's degree with a rigorous program and standards that allow a practitioner to provide speech, language, cognition, swallowing services to people from birth to death, with a license from the State of Nevada Speech Language Pathology and Audiology and Hearing Aid Dispensing Board (NVBOE). This is the license to practice Speech Pathology in our state. To obtain this state license SLPs must also obtain a national certification from the American Speech-Language Hearing Association (ASHA) that is called the Certificate of Clinical Competence. Built into both licenses is the requirement for continuing education and professional development in our field of practice, Speech Language Pathology. To require clinicians that already hold these two licenses (NVBOE and ASHA CCC) to take a reading, writing, and math exam or have a GRE score within the last 5 years is a barrier to recruiting SLPs that have been practicing in other settings.

It would be beneficial to allow SLPs reciprocity and the ability to obtain license for teacher of speech/ language impaired for their professional license that is held by a state licensing board (NVBOE).

The GRE, Praxis, and/or the SAT/ ACT scores do not adequately represent the skills required of a speech-language pathologist following graduation from an accredited graduate program. “ Those who have achieved the CCC—ASHA certification—have voluntarily met rigorous academic and professional standards, typically going beyond the minimum requirements for state licensure. They have the knowledge, skills, and expertise to provide high quality clinical services, and they actively engage in ongoing professional development to keep their certification current.” (asha.org/certification)

In Section 3 could we add (d?) reciprocity for state board license.

In Section 5 (c) referencing an endorsement the ASHA CCC is referenced, however currently the GRE scores or other competency measure 5(a) are also required. We are requesting reciprocity for our NVBOE license as a measure of competency.

Currently, the Nevada Department of Education offers reciprocity for Nurses (NAC 391.305 1), Occupational Therapists (NAC 391.277 1 (b)), and Physical Therapists (NAC 391.279 1(b)) that work in the school settings in Nevada.

Item A2, Nancy Kuhles

January 19, 2022

Dear Mr. Briske, President West-Guillan and Members of the Commission on Professional Standards,

For the record my name is Nancy Kuhles. I am a Speech-Language Pathologist and Co-Chair of the NSHA Coalition to Address Personnel Shortage in special education and related services. I would like to share with you the NSHA/NV Coalition's concerns regarding NAC 391.036, specifically the competency testing exemption in Section 3.

The current NDE licensure language requiring the use of the GRE, Praxis Core Academic Skills for Educators or NDE approved equivalent basic skills test to determine the competency of a master's level Speech-Language Pathologist (SLP) in the areas of reading, writing and math is a barrier to recruiting SLPs who may have started their careers in a setting other than schools as their GRE scores may be older than 5 years. Additionally, this poses a fiscal impact on small businesses employing speech-language pathologists. The small business would need to incur the cost of their employee(s) to take an additional test to prove competency of the SLP.

State of Nevada licensed SLPs working in practice settings such as hospitals, clinics, private practice or Nevada Early Intervention Services, who now choose to be licensed by NDE in order to work in a Nevada school setting are being required to take a competency test. This is a barrier to recruiting SLPs that have been practicing in other settings, recruiting more experienced SLPs and a barrier to Nevada school district employment. This is a fiscal impact on small businesses employing SLPs who may seek an independent contract with a Nevada school district.

These are master's level SLPs holding an American Speech-Language-Hearing Association (ASHA) Certificate of Clinical Competence (CCC). These SLPs have graduated from a speech language pathology program accredited by the Council on Academic Accreditation (CAA). The CAA of the American Speech-Language-Hearing Association (ASHA) accredits graduate programs that prepare individuals to enter professional practice in audiology or speech-language pathology.

In order to seek and obtain the ASHA CCC, the SLP MUST earn a master's degree from a CAA accredited program and complete a Clinical Fellowship Year (CFY).

NDE licensure recognizes the ASHA CCC as a pathway to licensure and licensure renewal.

On behalf of the NSHA/NV Coalition to Address Personnel Shortages, I am requesting the recognition of the ASHA Certificate of Clinical Competence (CCC) as a measure of competency under NAC 391.036, Section 3. I am requesting the Commission on Professional Standards and NDE licensure to accept the ASHA Certificate of Clinical Competence (CCC) for purposes of reciprocity. This would remove the fiscal impact on small businesses.

Thank you for your time and consideration to address this current barrier to recruitment and employment of Speech Language Pathologists in Nevada school districts.

Sincerely,

Nancy

Nancy Kuhles, M.S. CCC-SLP; F-ASHA
NSHA/NV Coalition Co-Chair
Nkuhles119@gmail.com; 775.772.4831

Item A3, Kate Schum

Under sect. 1, I would like to have better description of who the course needs to be delivered too. The regulation says ‘teachers, administrators and other persons employed by the school district or charter school’. The ‘other persons’ is where my question really lies, it mentions pursuant to NRS 391.2056, which establishes the code of conduct training but has the same language.

In section 3, subsection 2 – Only mentions ETS would qualify to offer the course. ETS’s course/test is between \$200 and \$250 and I think it would benefit everyone to have a less expensive option. Especially if someone is on leave and the training is required annually. You mentioned others but they aren’t outlined specifically in the reg.

Overall questions/concerns with this regulation. What are the acceptable methods of delivering the course? Can the hours spent annually on the course be counted towards the hours required to renew the license each year or only towards one year of hours in a renewal cycle?

Kate Schum

Human Resources Manager
kschum@washoeschools.net
775-348-0325