

**NEVADA DEPARTMENT OF EDUCATION
COMMISSION ON PROFESSIONAL STANDARDS IN EDUCATION
FEBRUARY 24, 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 Davis
Commissioner Roberts
Commissioner Wenger

In Carson City:

President West-Guillen
Commissioner Stokes

Virtually:

Commissioner Tucker

COMMISSION MEMBERS NOT PRESENT:

Commissioner Carvalho

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
Amber Reid, Education Programs Professional, Office of Safe and Respectful Learning Environment

Virtually:

None

LEGAL STAFF PRESENT

Deputy Attorney General David Gardner (Virtually)

AUDIENCE IN ATTENDANCE:

In Las Vegas:

Michelee Crawford, Clark County School District
Peter Wiens, University of Nevada, Las Vegas
Jeff Giehs, Nevada Association of School Administrators

AUDIENCE IN ATTENDANCE:

Carson City:

Kim Redding, ASHA President
Nancy Kuhles, ASHA
Barbara Sunderman, Western Governors University
Winship Varner, Sierra Nevada University
Kelli Brown, Sierra Nevada University
Eleni Oikonomidou, University of Nevada, Reno
Jill Heaton, University of Nevada, Reno
Kate Schum, Washoe County School District

Virtually: None

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

President West called the meeting to order at 9:01 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

1. Michele Cruz-Crawford, Clark County School District, provided a public comment regarding SB352 (*A summary of the statement is available in Appendix A.*)
2. Verona Sutton-Dunn, Clark County School District, provided a public comment regarding NAC 391.370 (*A summary of the statement is available in Appendix A.*)
3. Karen Klopfer, Nevada Speech Hearing Association, provided a public comment regarding NAC 391.370 (*A summary of the statement is available in Appendix A.*)
4. Jennifer Hodges, Washoe County SLP, provided a public comment regarding NAC 391.370 (*A summary of the statement is available in Appendix A.*)
5. Nancy Kuhles, ASHA Coalition, provided a public comment regarding NAC 391.370 (*A copy of the statement is available in Appendix A.*)
6. Kate Schum, Washoe County School District, provided a public comment regarding the emergency sub regulation (*A summary of the statement is available in Appendix A.*)
7. Marissa McClish, Washoe County School District Professional Growth Systems Project Coordinator, provided a written-in public comment regarding endorsement as an educational mentor (*A copy of the statement is available in Appendix A.*)
8. Daniela Felsenfeld, Clark County School District, provided a written-in public comment regarding tests of competency proposed amendments (*A copy of the statement is available in Appendix A.*)
9. Dorothy Parriott, PhD, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
10. Samuel Thompson, PhD, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
11. Brendon Ross, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
12. Gene Zalar, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
13. Jessica Peck, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
14. Jennifer O-Dell, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
15. Michael Rube, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)

16. Alayna Sacca, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
17. Nicole Kelley, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
18. Hannah Krantz, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
19. Ginger Shaffer, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
20. Stephanie Uhl, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
21. Tamara Filangieri, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
22. Christina Blose, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
23. Sasha Bisda, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
24. Camille Layseca, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
25. Ruth Brinkerhoff, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
26. Jasmine Mitchell, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists (*A copy of the statement is available in Appendix A.*)
27. Tiffany McDougall, Nevada English Teacher, provided a copy written-in public comment regarding NRS 391.019 (*A copy of the statement is available in Appendix A.*).
28. Alisha Askin, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers (*A copy of the statement is available in Appendix A.*).
29. Ryan Sanshuck, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers (*A copy of the statement is available in Appendix A.*).
30. Lorenthia Clayton, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers (*A copy of the statement is available in Appendix A.*).
31. Savannah Cortner, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers (*A copy of the statement is available in Appendix A.*).
32. Alexis Hellman, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers (*A copy of the statement is available in Appendix A.*).
33. Habtamua Assore, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers (*A copy of the statement is available in Appendix A.*).
34. Elissa Couch, Nye County School District, provided a call-in public comment regarding Agenda Item #12 (*A summary of the public comment is available in Appendix A.*).
35. Peter Wiens, University of Nevada, Las Vegas, provided a public comment regarding NAC 391.XXX (*A summary of the public comment is available in Appendix A.*).

President West thanked everyone for their participation in providing public comments. He asked participants to provide copies of any prepared public comment statements to Secretary Fuson for purposes of transcribing the minutes.

3. APPROVAL OF JANUARY 19, 2022 MINUTES

Motion: Commissioner Stokes moved to approve the January 19, 2022, meeting minutes. Commissioner Davis seconded the motion. **Motion carried unanimously.**

4. PRESIDENT'S REPORT

President West stated he appreciates the lengthy public comment on agenda item 12; however, as staff continues to receive input on the proposed changes on item 12, they will be pulling that item from the agenda today. He stated this will allow them to work with stakeholder input and bring that back at a later date.

5. SECRETARY'S REPORT

Jeff Briske stated the Department has been working with several stakeholders and cross-office collaborators to bring together these public workshops that they trust will continue to streamline processes, remove barriers, and bring in line with other states or be the leader in innovation across the country.

6. ALTERNATIVE ROUTE TO LICENSURE PROGRAM NOTIFICATION

Jeff Briske stated Western Governors University (WGU) has been a long-standing partner providing elementary and secondary educator preparation programs and producing teachers for Nevada and other western states. Mr. Briske stated currently, WGU and WGU Corp are independent legal entities that are affiliated through overlapping board members, a legal commitment of WGU Corp to advance the mission and purposes of WGU, and an operating agreement between WGU and WGU Corp to notify and consult with WGU prior to taking certain major actions.

Mr. Briske stated WGU plans to bring WGU under WGU Corp and establish WGU Corp as a systemwide parent entity. WGU has received approval from accrediting bodies Northwest Commission on Colleges and Universities and the Association for Advancing Quality in Educator Preparation. They are now seeking approvals from this body and all other regulatory bodies prior to implementing the change on or before April 1, 2022.

Mr. Briske stated the Educator Preparation Program of the Teachers College at WGU will remain intact and there is no change to either the University or Teachers College in accreditation, academic leadership, mission, management, or non-profit status.

Mr. Briske invited Dr. Barbara Sunderman, Senior Lead College Compliance Advisor for Educator Preparation and Academic Engagement from WGU, to answer any questions the Commission may have, and there were no questions from the Commission.

Motion: Commissioner Belknap moved to continue to approve the ARL and Traditional educator preparation programs offered at WGU. Commissioner Wenger seconded. **Motion carried unanimously.**

7. TRADITIONAL AND ALTERNATIVE ROUTE TO LICENSURE PROGRAM TRANSFERS

Jeff Briske stated Sierra Nevada University is in the process of being acquired by The University of Nevada, Reno (UNR). The plan is to conclude this transition on July 1, 2022. UNR is seeking permission from the Commission to transition the approved both the Alternative Route to Licensure (ARL) programs and Traditional programs of Sierra Nevada University (SNU) into the College of Education and Human Development at UNR while keeping the programs intact to offer a smooth transition to teach out the students who are currently enrolled in these programs. UNR is also requesting that the approved Social Emotional and Academic Development (SEAD) endorsement be approved for transfer from Sierra Nevada University to UNR.

Mr. Briske stated he is available for questions and joined by Associate Dean and Vice Provost from UNR in the North to answer any questions the Commission may have.

Commissioner Roberts asked does that mean the students will have no choice about where they will go once this merger occurs.

Jill Heaton, Senior Vice Provost at UNR, stated she is leading the transition and students always have a choice to continue their education somewhere else, but UNR has adopted the SNU programs exactly as they are offered at SNU. They have committed to teaching the students out in the same geography and modalities as they currently are. They have also committed to the students that it will not cost them anymore to finish

their degrees at UNR than it was costing them to attend SNU. Their commitment is approximately three to four years, anticipating that most students will finish within three years, but have committed out to four years so they can accommodate any SNU students attending part-time. They also have a Town Hall tomorrow to provide them with all of the necessary information that they need to apply to UNR, in the sense that they have to acquire their information from them, but there is no application fee. It is also to make them understand the cost of attendance and how that differs or translates between SNU and UNR. They hope that approximately 150 students, plus the additional 50-60 non-degree seeking students will choose to finish their degree at UNR. They are doing everything to ensure that there is minimal, if not any, disruption to them whatsoever.

Motion: Commissioner Belknap moved to continue to approve the transfer of educator preparation programs and endorsements from Sierra Nevada University to University of Nevada, Reno. Commissioner Davis seconded. **Motion carried unanimously.**

8. ANNUAL COMMISSION REPORT TO THE STATE BOARD OF EDUCATION

Jeff Briske stated each year the Commission is required to submit an annual report to the State Board of Education (SBE) per NRS 391.028. This report includes a summary of the regulations adopted, a work plan of proposed activities, and a description of the progress and status of each regulation relating to the licensure of educational personnel.

Mr. Briske stated he will go over a few highlights as the Commission has received the report.

Commission Report Highlights:

- Pages 1-4 of the report describe the current membership of the Commission as well as our current work plan for 2022.
- Page 5 describes legislative actions required of the Commission:
- Assembly Bill 225 directed the Commission, when adopting regulations, to consider including alternative means of demonstrating competency other than examinations for person with a disability or health-related need. The Department is in the process of researching best practices in this area, as well as what would be considered appropriate alternative means of demonstrating competency. The Department is also in the process of soliciting stakeholders to take part in a work group to consider how this could best be implemented.
- Senate Bill 352 amended NRS 391.019, directing the Commission to make regulation regarding student teaching and school psychology internship. The Department convened a work group in early 2022 to discuss these requirements. This regulation will be presented today.
- Page 6 describes the regulations adopted by the Commission in 2021. In brief, those were:
 - o R076-19 amending NAC chapter 391 which updated licensure requirements to align ARL licensure with traditional licensure, allowed professional development in lieu of college course work for the Parent Involvement and Family Engagement (PIFE) and Multicultural Education requirements.
 - o R090-19 amending NAC chapter 391 which updated the elementary and early childhood licensure requirements, removed the special qualifications license pursuant to Senate Bill 41 (2019), and allowed a member of the United States Armed Forces or their spouse, who completed an ARL program in another state to be licensed in Nevada.
- Temporary Regulation amending NAC 391.0896 that expired on November 1, 2021, allowing school districts with a student enrollment of over 9,000 students to employ individuals holding only an emergency substitute license, during a state of emergency declared by the Governor pursuant to NRS 414.070.
- Page 7 describes a regulation adopted by the Commission in 2021 pending hearing and approval by the Legislative Commission. This regulation R026-20 amending NAC chapter 391 updates the name of the introductory computer science endorsement and revises the requirements to obtain an endorsement to teach students in the Jobs for America's Graduates (JAG) program.
- Page 8 describes regulations pending public hearing by the Commission. These are in brief:
 - o R113-20 makes changes to licensure practices that conform either to other language in NAC or current practice.

- o R114-20 allows ACT and/or SAT scores to be used in lieu of Praxis CORE exams for licensure, allows for a certificate of competence to add and endorsement in a Career and Technical Education area to an existing license, and allows a person holding a Business and Industry license to add an endorsement in computer science, cultural competency, and or social, emotional, and academic development.
- o R117-20 clarifies the requirements for training on the Model Code of Ethics for Educators provided to school employees by school districts. These three regulations 113, 114, and 117 will be brought to the Commission at a future meeting.
- o R028-21 amending NAC 391.0896 regarding emergency substitutes would replace the expired temporary regulation enacted in 2021. This regulation is item 9 on today's agenda.

Mr. Briske stated he is available for questions and there were none.

Motion: Commissioner Davis moved to approve the annual Commission report to the State Board of Education. Commissioner Stokes seconded. **Motion carried unanimously.**

9. 9:00 A.M. PUBLIC HEARING TO SOLICIT COMMENTS FROM ALL INTERESTED PERSONS REGARDING THE AMENDMENT OF REGULATIONS PERTAINING TO CHAPTER 391.036 AND 391.0896 OF THE NEVADA ADMINISTRATIVE CODE (NAC), PURSUANT TO NEVADA REVISED STATUTE (NRS) 391.019 REGARDING QUALIFICATIONS FOR LICENSURE AS IT RELATES TO EMERGENCY SUBSTITUTE TEACHERS.

Jeff Briske opened Public Hearing for Regulation 028-21 affecting NAC 391.036 and NAC 391.0896.

Mr. Briske asked Board Secretary Dylan Fuson if there is any public comment submitted via email regarding this item, and Mr. Fuson replied there is one public comment from Tiffany McDougal.

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) and mirrors the Emergency Regulation enacted by the Governor and the Temporary Regulation enacted by the Commission.

Mr. Briske summarized the changes:

- Section 1 near the middle of page 2 affecting NAC 391.036 is conforming language to match amended numbering in Section 2.
- Section 2(3) near the middle of page 6 affecting NAC 391.0896 adds language allowing a person to reapply for an emergency substitute license more than two times at the request of the school district or charter if a state of emergency has not been proclaimed or at the State Superintendent's discretion during a state of emergency.
- Section 2(5)(6) is language to conform with a new subsection (7).
- Section 2(7) is new language allowing a school district whose enrollment is 9,000 students or more or a charter school located within the geographic boundaries of such a school district may, during a state of emergency, hire an emergency substitute teacher to serve as a teacher in K-12 as needed.

A person employed pursuant to this subsection may serve as a teacher for the remainder of the school year in which the state of emergency is proclaimed, regardless of when the state of emergency is terminated.

- Section 2(9), which is now (10) is new language describing and requiring at least 1 hour of training to be provided by the district for each emergency substitute teacher before serving as a teacher.

Mr. Briske stated he is available for questions and joined by Mike Arakawa in the South and would invite any members representing Washoe and Clark to the table to be available for any questions the Commission may have.

President West thanked Mr. Briske and stated in understanding the sense of urgency associated with this regulation, he thinks it's important they provide a certain level of scrutiny since they are memorializing it

now within N.A.C. He stated he has a couple of questions but would like to open it up to the Commissioners for any questions.

Commissioner Tucker stated she is interested to know what the 1-hour of training consists of. Ms. Tucker asked if they have a Senior in high school who just graduated, are they only getting 1-hour of training before they're substituting in a classroom.

President West stated that was a great question and asked if representatives from Washoe County and Clark County could help them better understand. His understanding is that there's still an onboarding process that involves education and training, but he does share Commissioner Tucker's concern, so he's curious if there's already a system in place that provides for more than 1 hour, then maybe they can have that conversation.

Kate Schum, Human Resources Manager with Washoe County School District, stated they offer a 3-hour course, and it includes classroom management tactics, how to keep students on task, how to reengage students, general information on schools and the restorative practices of the schools so that the substitutes know what each school looks like. For example, if one school allows for five minutes extra at recess, they know that going into the day, so there's that consistency for the students.

Commissioner Tucker asked if they have the 3-hour training in addition to the 1-hour of training, and Ms. Schum replied their training exceeds that 1-hour required in the regulation and they ask them to do it within the first 90 days. Some folks get in right away, but they try to make it as flexible for them as possible.

President West asked if they have any input from CCSD and there was none.

Commissioner Belknap asked what is the current need of subs statewide and why is this being brought up now. He stated it seems like they're permanently memorializing this with the language around the State Superintendent being able to accept letters from these districts, even when there isn't a state of emergency, they are essentially saying anyone with a high school diploma can substitute not just a couple of days but for an entire school year, teaching a K-12 classroom.

Mr. Briske stated President West pointed out that it does say "during the state of emergency," so he misread that earlier. He stated regarding the question about the current need of substitutes, he will defer to Ms. Schum in Washoe, and stated he recently pulled a report that states during the emergency reg time period and the temporary reg time period, the Department did license about 600 emergency subs from Clark and Washoe alone, so those subs were licensed and ready for employment at that time.

Commissioner Belknap stated with the emergency license, it's saying that they may be able to reapply for more than two times after the expiration of his or her original special license as an Emergency Substitute Teacher at the written request of the school district or charter school that employs the applicant if a state of emergency or declaration of disaster has not been proclaimed pursuant to NRS 414.070. He asked does this mean that anyone who currently has an emergency substitute license or gets one before the state of emergency is over, can now be a substitute two or more times after that for years to come.

Mr. Briske stated his remarks were correct the first time around and asked Mr. Arakawa to comment on the point that Commissioner Belknap is speaking on in Section 3.

Mike Arakawa stated they're looking at two things within this regulation, and one is what extraordinary powers would be given to school districts with an enrollment of 9,000 pupils or more during a state of emergency and that would be to hire emergency substitutes, where normally they would be precluded from doing so by regulation.

Mr. Arakawa stated that Commissioner Belknap is correct in that the section he is looking at does give discretion to the Superintendent in the case of someone who holds an emergency substitute license and is requested by the district to be able to continue in that role. However, that would only apply outside of a state of emergency within the rural counties that have an enrollment of less than 9,000 pupils. It would not apply outside of a state of emergency in Clark or Washoe counties.

Commissioner Belknap asked where in the regs is that outlined and stated he is trying to be as thorough as possible because he has a lot of concerns about this, so he wants to make sure that he understands it completely that this part only pertains to rural counties.

Mr. Arakawa read the regulation on page 6, bullet 4. He clarified that in an emergency in this context does not refer to a state of emergency declared pursuant to NRS by the Governor or the State Legislature, and this is existing language that was already in the regulation pertaining to the inability of some of those districts to find more highly qualified substitutes.

Mr. Arakawa stated that on page 7, bullet 7, this is the exception that only occurs during a state of emergency that is declared pursuant to NRS. At the end of the school year in which the state of emergency has terminated, the permissions within the regulation revert back to what they were previously which means a larger district would not be able to employ an emergency substitute.

Commissioner Belknap asked if they would not be able to employ one in terms of a full-time teacher, and Mr. Arakawa replied for the larger districts, they would be unable to employ an emergency substitute teacher period, once the emergency is lifted, pursuant to statute because that exception in blue only exists when a state of emergency has been declared by the Governor or the State Legislature.

Commissioner Belknap stated he has another question and then he will stop to allow others to ask questions. He asked when they're having people with a high school diploma or equivalent in the classroom serving as full-time K-12 educators during the state of emergency, where is the accountability. He stated they give them one hour, and they don't know how much CCSD requires because they're not here talking on it. Washoe gives 3 hours, which is great, but he does not believe that is enough to be able to serve as a K-12 educator. He stated it's watering down the standards and asked why these emergency subs are exempt from any type of evaluation recurring like full-licensed educators.

Mr. Briske stated it's his impression that emergency subs and substitutes are not under contract covered by associations and are not evaluated as regular licensed teachers would be.

Commissioner Belknap asked could they not write in the regs that they need to go through some type of evaluation process. He asked if they are letting these people be in a classroom with children for seven hours a day, for an entire school year in a state of emergency, do these children not have the right to a quality educator to ensure that this emergency sub that's in front of them is actually teaching these children. He stated they only get one shot at one of these grades.

President West stated he hopes that this topic will be part of further conversation and appreciates where Commissioner Belknap is coming from. He agreed that they need to put their best foot forward with their kids and stated at the same time, if the declaration of a state of emergency were to be lifted tomorrow and determined that COVID-19 is not providing the threat that it was previously and it was removed, he thinks the districts would tell them they would still need that provision. The need for these emergency subs does not go away just because the state of emergency was lifted.

President West stated given the condition that they're in, they need to memorialize this so that the districts can continue to operate in the fashion that they have been operating under the declaration of emergency. He stated there's an opportunity for a subsequent conversation, but to Commissioner Belknap's point, one of the things that would really help guide that is to get data from Washoe and Clark school districts on what was the role of these emergency substitute teachers and what would be the impact of not having these substitute teachers. He asked does it mean these kids are going to be sitting in a lunchroom unattended and what are the outcomes and proficiencies to help them make the case that they are doing what's best for their young people.

President West asked Commissioner Belknap does that help guide where this can go.

Commissioner Belknap replied he sees where he's coming from, but he does not think they need to memorialize in perpetuity in this regulation that a warm body is better than nobody. He stated he thinks education in Nevada deserves better than that, and they need to go back to these districts and ask them what they are doing to incentivize people to work for you, not to give them an out to then get returning graduates. He stated when he first read this, his first thought was, if this is passed, would the students in his classroom right now be subbing

next year. State of emergency or not, he thinks they really need to look at this in a different light and find ways to better incentivize that these districts need to do more.

Commissioner Belknap asked who defines the state of emergency, and Mr. Arakawa replied that a state of emergency is declared pursuant to that statute that's referenced there and may only be declared by the Governor or State Legislature.

Commissioner Davis asked does this include also teaching in Special Education and if it does, is there going to be any additional training for those subs who do take on those Special Ed positions.

Mr. Briske replied yes, this would include any and all teachers regardless of assignment for that day or days and it's up to the commissioners if they would like to make a non-substantive change to this at public hearing today. If that pleases the Commission, they could determine that 1-hour is not enough and maybe they should consider more.

Commissioner Tucker stated as a teacher who is not present and on Zoom today because she does have a sub, she can speak very clearly as to the sub shortage. She stated there have been many times that teachers are pulled from Special Ed or English as a Second Language and has to cover other classes in which those students aren't receiving their minutes of instruction. Students are also split between classes, so a 1st grade class that usually has 20 students will get 30 students, and that can be for more than one day as teachers are gone five days for COVID. She also has had a high school graduate sub, and she has to say it was not good. She's scared of who is coming into their classrooms, but she's also scared of not having anyone in their classrooms. This is not a problem that's just from COVID, this has been going on for a long time and it's just exacerbated by COVID. They don't really take care of their subs in general, and they don't really pay them a lot for what they are required to turn in. She agrees with the letter that was read earlier as far as the fingerprinting and the weeks to get all the letters, which is quite a process and it should be, but it's a catch-22 where they've made it fairly difficult to become a sub all the way to high school graduate.

Commissioner Tucker stated she understands there's an emergency, but they literally have had high school graduates in the classroom teaching children standards that are measured on state tests for months at a time. She stated that being in the schools and working with many of these people, is quite scary. She understands it's an emergency, and they need a warm body, but they've had their Principal, Vice Principal, and Music teachers sub, and it's not fun teaching or subbing right now. She does not know the answer right now other than she's hesitant to approve forever high school graduates subbing. She stated her son is a recent graduate with an educational background, and she does not want him subbing for her, and he is actually more qualified than many of the people that she has seen. She does not know where she's going with this, but 1-3 hours is not enough. She does not know what is enough, but it's not good.

Commissioner Wenger stated she wanted to echo the concerns of the other commissioners that have spoken so far. She stated she does have difficulty with that 1-hour of training. As a licensed staff, they have to do 14 hours of videos every single year. She has a background in education, and she still has to do the 14 hours of videos. Although she commends Washoe County School District for the 3 hours, she still does not think that's enough. She thinks they need to increase this, especially if this is going to be a part of regulations permanently.

Commissioner Wenger stated she also wanted to comment on the accountability piece. She stated as a Commission, they should consider the accountability and tracking these things. She suggested a yearly report from all school districts. She doesn't want to hear from just Washoe and Clark. She also wants to hear from their rurals. She stated the annual report could have the number of substitute licenses, how many days those substitutes are used, what classrooms they're serving in and should be tracked very closely and monitored. She stated if there's no question, she asked if someone could speak to potentially adding those factors in.

Commissioner Stokes stated from a school district perspective, they are not the only agency, business, or institution looking for employees. This is a national condition, so what he thinks they're trying to accomplish is a stopgap measure, but it has been a number of years since they have been able to fully employ enough people in their organization to feel like they have fully-qualified individuals in every spot. He stated education has not been respected in a high degree for several years, and they're seeing that by the reduction of the number of students going into higher ed. He stated he wish that were a different situation, but it's not, and what they're doing is trying to provide some opportunities for their teachers who are in the trenches.

Commissioner Stokes stated that Ms. Tucker is correct. He has done substituting, been in classrooms and playgrounds to try offer support as have colleagues from their school district office, and anybody who has the ability to supervise students or have some experience, they are trying to spread them around in their organization, but it's not the high-quality a fully-endorsed teacher with licensing and the desire to be in the classroom, so it does feel like they're doing a stopgap effort. He's hoping that in some way, this event can be addressed from a state perspective as Legislature meets again. He stated they are in a crisis point and they're going to see this continue for years until they get more people in the program. He has no solution other than say he recognizes that this is a serious issue.

Commissioner Stokes stated he can speak a little bit on the performance piece. They have staff members who are mentoring, supervising individual emergency subs. If they do have difficulties, they intercede immediately. He believes it's the responsibility of each school district to supervise these individuals and do the best they can. In some cases, it is having someone who's willing to be in the classroom for some period of time to provide supervision, but it's not the same as having a qualified full-time teacher in the position.

President West stated he really appreciates the comments and agrees completely. Obviously, they are finding themselves in unprecedented times. In light of the fact that they do currently have a state of emergency in play, and the regulation has expired but it is being utilized, he thinks it's important that they advance something. This is something really for extraordinary measures; however, he agrees with the comments made. In terms of the training provided, he would like to have a little more discussion on that. He asked do they think a minimum of 8 hours of training is not asking too much. He stated to the questions about the reporting, he agrees completely. Unfortunately, they don't have the information in front of the today; however, he does not know if it's necessary to memorialize. In this regulation, the information they want to see, this Commission can request that data at any point. Based on the comments made, he believes it would be appropriate to do a review of the data at the end of the school year where the districts have had a complete school year to work through the situation. He suggested requesting the data sometime in June or July, so they can look at where they're at and what the impact has been. He reminded the Commission that these regulations can be amended. Upon review of that data at the end of the school year, if they decide that it's really not serving the best interest of their youth, then let's make changes.

Commissioner Tucker asked if they have any information on how many subs on average in a day are need and how many subs are filled.

Ms. Schum from Washoe County School District stated they average in need about 425 a day with peaks on Mondays and Fridays, especially surrounding a long-weekend. She stated they fill about 72 to 75 percent of those from their sub pool.

Commissioner Wenger stated she wanted to respond to President West's comment about the accountability report. She stated she understands the Commission can request the information at any time. She thinks it's still important to include that accountability piece in the regulation because she has a full-time job and can forget about these things, and that regulation would keep the Commission accountable as well for reviewing this type of regulation on a regular basis.

Commissioner Roberts stated when they're talking about accountability, she understands the need to see the numbers to show need for the substitute teachers, but she thinks what's more important is how did it impact the school. She stated when they're looking at measures, they should also be looking at the perspectives of the teachers, principals, and students and not just the numbers that they're receiving. She understands the accountability part, but unfortunately, the students who wind up losing the most are the children who need it the most, and they should really consider that. They need to think about the system as a whole.

Commissioner Roberts stated in addition, they should put more trust in their administrators that they will have enough sense to be checking up on these new teachers, but also, that they will push for more training for these new teachers. She stated it should not only be for the new substitute teachers but for the type of teachers they hire. Just because they have a substitute license, does not mean that they have to be hired, so they're going to have to be a little bit more critical of who comes through their door and applies and then also provide more support. She knows that some of them are going into the classrooms to teach themselves, so they know what it's

like and understand the consequences of not having teachers in the classrooms. She stated they do need to push for more training and does not think one day is enough.

Commissioner Roberts stated she was a principal before and there's no way she's going to put someone in the classroom with one day's training. They also have to make sure that their administrators know the importance of that training. If it's a week of being in the classroom with another teacher to know what's it like, then they need to do it. She does not think it's a bad idea to have this memorialized, but they are going to have to make sure that somebody is in there checking to see what is happening in the classroom. They are not going to expect top-quality instruction because they know where they're coming from, but there has to be some accountability and it's not just the numbers, it's what's going on in the classrooms and how is it impacting the education of the students.

Commissioner Belknap stated he wanted to echo what Commissioner Wenger had commented earlier about the accountability report. He thinks 100% this needs to be outlined in regulations by this Commission. They cannot rely on humans to remember this, so they need to institutionalize it because they're on up there with the best of intentions to help education in the state, but he's seen too often best intentions fall to the waist side and they get inundated with their work. Educators and administrators are drowning in work and everyone is stretched so thin, and unless they, as a Commission, institutionalize this and make this a requirement, it will likely not get done on an annual basis. They need to know where these emergency subs are subbing. He asked are they in their most at-risk schools, which they likely are, because those are the schools that are the hardest to try to get subs at. He worked at a school like that for 7 years. They also need to know what subjects they're subbing in, such as SPED or General Education.

Commissioner Belknap stated he thinks they do need more training on this and the requirement needs to be the same as the annual training for educators. Maybe not the same training because their needs are a little different, especially if they're serving long-term, but it should not be less than what educators are subjected to every year. The accountability piece is key. He stated he thinks NDE needs to put forth some type of sub evaluation and ensure that administrators are doing it. While there are good administrators out there that will make sure that they're checking in on their long-term subs, he's personally experienced it time and time again at his previous school, which was an at-risk, Title I, school, where they would get a long-term sub in their department and it would be put on the educators to check on the subs, when it's saddled on him and he's already teaching six classes, different subjects, throughout the day. It needs to be put on administration. They're there as the chief educational instructional leader on campus. They need to be the one going in and observing them. He thinks this is critical to make this happen.

Commissioner Belknap asked what does the letter to renew their emergency sub license look like and what does it require. He asked is it just a letter from the CCSD Superintendent to the state asking for subs.

Mr. Briske stated the letter is on their website and if it passes and is adopted, they will have to update it according to this regulation. In the past, the way the regulation was written, they do submit a formal request from the district to their State Superintendent to have them licensed. The request says they need substitutes in their district and requests that they apply and re-apply up to 2 years.

President West asked to clarify as it relates to this reg, it is not applicable in Washoe and Clark unless the state of emergency is in effect, and Mr. Arakawa replied that is correct.

President West stated he feels the commissioners' passion and appreciates all the energy and efforts that they have all put into their professions. He stated their passion is very evident. He stated the challenge before them today is that as a function of the state of emergency that was issued, there was an emergency reg and temporary reg that was adopted and those have both expired. The regulation before them today, not only has to be adopted by this body but also the State Board of Education, which they have scheduled a Special Meeting for tomorrow, and the Legislative Commission has a meeting on Monday, the 28th to adopt this regulation. Without this regulation, as mentioned earlier, there are 600 subs that this would affect and they would be eliminated from the pool for Washoe and Clark for the remainder of the year. While he completely appreciates where they're at, the reality of the situation is that they're currently in this environment, and they need to figure out the best way to navigate this environment until they can take time and energy to implement and discuss the questions and concerns that they have brought forward. It's not an ideal situation, and he completely appreciates that.

President West stated that while he agrees with the accountability piece, the concern is if they make a substantive change to this regulation as proposed today, it will have to go back out for public comment, which delays a minimum of 30 days. Once again, Washoe County and Clark County will be in limbo while they rehear this regulation. He stated he has it on good authority that they could change the amount of training because the training component section is already in the regulation, so they're talking about changing a number and not adding an entirely new section. He stated that he does not want to dismiss any of the concerns that have been brought forward and shares them all. Unfortunately, they have found themselves in a very difficult situation. He knows there's concern about who is going to be on top of bringing this information forward. All he can provide is his personal assurance that they will stay on top of this issue and revisit it, but given the current situation, there's a sense of urgency.

Commissioner Wenger asked if they could extend the temporary regulation and rewrite this with all of their comments in mind, and then bring it back up at a future date with all these kinks worked out.

Mr. Briske asked Mr. Arakawa to correct him if he's wrong and stated the temporary regulation can only be brought forward once when Legislature is in session and that regulation did expire on November 1st.

Mr. Arakawa stated to piggyback on Mr. Briske's comments, the purpose of a temporary regulation is to enact a regulation while the Legislature is in session, which is not normally done. There is no provision in law either to extend or enact one outside of a Legislative session, so the answer is no, they cannot do that.

Commissioner Tucker stated she would be willing to vote on accepting this with increasing the amount of training because she knows they have to do it and they need people in their schools. Even with the emergency subs they have right now, they still don't have enough, so if they don't go forward, she does not know what's going to happen with their schools but they do need these subs. There is also an evaluation that a teacher can take for how did their sub do. Obviously, they are not there when a sub is in their place, but it's already in and if they can emphasize and get teachers to fill those out. She does not know what happens to them and who gets them, but they are there. She rarely fills them out as she often does not have time, but she can make that time, knowing that this is important.

Commissioner Stokes stated he would be in favor of voting yes on the amendments that have been made in support of the folks in Clark and Washoe counties. They have a tough road ahead of them, and he recognizes the fact that these are extraordinary times, and he thinks this body needs to act in favor of their efforts.

Commissioner Belknap stated they keep saying they have 600 emergency subs and asked how many of them are actually active and currently subbing.

Mr. Briske stated that they were licensed during the period when the emergency and temporary regulations were in force. As far as assignment data, that would have to come from the districts on how often they are hiring or if they're active subs or not. He clarified that what President West stated earlier regarding these 600 subs, whether or not this regulation is adopted today, those 600 subs could remain teaching for the remainder of the school year or as long as Nevada is in a State of Emergency. For instance, if the state of emergency is lifted at the end of this month, they can remain employed until the end of the school year. If the state of emergency continues through late August or through September, they could also remain employed for that school year as well, provided that their license is not expired.

Commissioner Belknap stated he would like to know how many of them are active, if they're doing this for those 600 emergency subs. He stated he does not know if it's possible today to take a recess to find out that information from the districts and see if they can generate that quickly. He stated in regard to what Commissioner Tucker brought up, he has never seen a sub eval, so as far as accountability for that, that has not been his experience in CCSD. When they have emergency subs in full-time as a teacher, there is no fully licensed teacher available to do that evaluation. Again, he stands adamant that they need real accountability of these emergency subs if they're going to move forward with this in perpetuity.

President West stated based on the comments from Washoe County School District, they're only filling in 75% of the sub vacancies that they have, so that gives them a pretty good indication that of the emergency subs that are out there, they seem to be utilized.

Mr. Arakawa stated Ms. Michelee Crawford just advised him that she has information on the utilization of emergency subs within CCSD and asked if she could take the table and testify, and President West confirmed yes.

Michelee Crawford stated according to Jonathan Ferrer who is the Director of Sub Services for CCSD, sub training includes a program that takes 8 to 10 hours, which is a Substitute Teacher Training Program. Subs are also required to take the district's ELMS training within the 45 days of hire. They also need to read and acknowledge the Substitute Teacher Handbook that covers procedures, pay status changes, discipline, essential duties, responsibilities, professional ethics, policies and regulations. The STEDI covers classroom management, teaching strategies, professionalism, special education and legal issues. Submission of the diploma to confirm completion of the assessment at 85% or higher is required to be done within 45 days of hire. She stated that he is getting back to her on the average daily rate of vacancies.

Commissioner Wenger asked Ms. Crawford is that training for a regular sub license or an emergency sub license, and Ms. Crawford replied all of the subs are required to have that training, so he said it's for the emergency subs as well.

President West stated based on that input from CCSD, it appears that an 8 to 10-hour requirement would not be excessive.

Commissioner Roberts asked if she understood correctly that they would be able to go back and add something to this regulation.

President West replied that is correct. He stated they can make minor changes today. However, they can start as soon as the Commission would like on review and discussion of what this might look like going forward.

Commissioner Wenger stated in terms of changing that number, she thinks as a licensed professional, they all have to do about 14 hours of training, so she feels a good number would be exactly what a licensed teacher should be doing. She stated she would also like the Commission to bring back this regulation to add that accountability piece because she thinks it's absolutely imperative, especially if these emergency subs are in their most needy schools, and those students deserve the best, and they, as a Commission, need to take that into consideration.

Commissioner Tucker asked if this training time is going to be paid time or time on their own because she believes that to get them to do it, they should give them some pay to take this training.

Ms. Schum from Washoe County School District stated they do not compensate their substitutes for the 3-hour training, and they do it on their own time. She believes the STEDI program that CCSD was referring to is one that you pay for unless CCSD picks up the cost, so it's not just the cost for the training, in addition, she does not believe there's compensation for that from an employer's standpoint.

President West asked is the 14 hours that was referenced and required of teachers applicable to emergency subs.

Ms. Schum stated they have a similar process in Washoe, and they call it Safe Schools. All of their employees, including their subs have to take it. It is roughly 21 hours, and it's on their own time where they log into a computer and watch videos. From an HR standpoint, they are standard videos.

President West stated currently in the regulation, it stipulates that the training must include classroom management strategies, behavior management techniques and asked would that be inclusive in their standard training.

Ms. Schum stated that's part of their 3-hour course that they do. It's one-on-one with an instructor, so there's a lot more interaction as opposed to just watching a video that delivers the information.

Commissioner Tucker stated what she's trying to say is if they're trying to attract emergency subs and they're asking them to do 14 hours on their own time, she does not see it happening, and they're going to lose the people that they were trying to get to come in. She stated she believes they need the training but does not think requiring them to do it on their own time without pay is going to fly.

Commissioner Wenger stated she thinks it is reasonable to ask for a day's training in 8 hours and is just trying to get the Commission to figure out what can they pass. She agrees that subs should get paid for this training,

but she does not believe that it's in the purview of this Commission to decide, so is recommending 8 hours of training.

Commissioner Davis stated she agrees with that recommendation. They are not in an ideal situation with having to pass this, but she also knows that the sub shortage has affected her school as her Vice Principal and Principal have been tag-teaming teaching 4th grade since they got back from Winter break, so they do need people in there, but she gets that they want to make sure that they're qualified and they're able to fulfill the needs that their children have. They have such diverse needs in their district, so she thinks if they can get something passed today so that they can keep their subs in place, that would be important.

Commissioner Wenger asked if she could make a motion that they make that change and then also to bring it back to the Commission for that accountability piece.

President West suggested they refer to their DAG on whether or not they should include a recommendation to bring this back to the Commission for further discussion at a later date because they don't have the other piece agendaized.

Deputy Attorney General David Gardner asked to have the question repeated so that he can have the full context.

President West stated they believe they're at a point where they're ready to move the regulation forward. However, they would also like to memorialize a recommendation to bring this back for further conversation at a later date. The question was whether they should do this in two motions or in one motion.

Mr. Gardner stated they can do it in one motion or two motions as long as it is clear. The clarity is what matters.

President West stated they are contemplating changing a requirement in subsection 10 from 1 hour to 8 hours and wanted to confirm that that would not be considered substantive and the regulation could move forward.

Mr. Gardner stated that would be substantive. Anything that would change those kinds of requirements would be substantive. Non-substantive would be something like fixing a typo or something to that effect.

Commissioner Belknap asked is it possible to make the change to 8 hours or how many hours it pleases the Commission for the training and then have a new regulation written around accountability for subs when serving in these emergency or long-term situations because he thinks the lack of accountability for these subs is the hanging point for him. He asked is there a way to write a separate regulation accountability so that they can move this forward.

Mr. Gardner stated that is allowable. He stated they could approve this regulation and then at their next meeting, hold a workshop since he does not think they have enough time to change it. He stated just because they pass a regulation, does not mean it's set in stone. They can always come back and do changes to it.

Commissioner Belknap stated he is happy with that because the accountability piece is the most important thing to him right now.

President West stated if it serves the Commission, they will need to adopt the regulation as proposed and include a recommendation to bring this back for further consideration by the Commission at the next meeting.

Commissioner Wenger stated she's trying to wrap her mind around this and asked for confirmation on her understanding that if they approve this, these 600 emergency subs would not be affected because they could serve out the remainder of the year.

Mr. Arakawa stated that's partially correct because anyone hired under the temporary regulation in one of the affected districts, once that regulation was no longer in affect, the exception would cease to exist, and they could no longer be kept in those positions legally.

Commissioner Wenger asked if they could set a date for when they would come back at their next meeting.

Mr. Briske stated because the March meeting is only 3 weeks away, they would have to rework this within the next 2 days to allow for a 15-day posting public workshop, so he would recommend the 8th of April meeting at the earliest or possibly May. Even if they don't bring it back until April, they still have the ability to work

through the process and make the changes that they need to make prior to the next school year, and that's assuming that the state of emergency is still in existence.

President West stated it's worth noting that as a function of this, the emergency subs will work through the end of the year.

Commissioner Davis stated he had said they were going to have a meeting about this tomorrow and they were going to adopt this on Monday, so anyone who applies to be an emergency sub after Monday would have to meet these requirements as written and asked if that was correct, and President West replied that is correct.

Commissioner Stokes stated when he thinks about what will happen if this does not go through, they are going to have large sizes in their classrooms if they don't have staff to help management those things, so he is in favor of this moving forward.

Motion: Commissioner Davis moved to adopt the changes to NAC 391.036 and NAC 391.0896 as written with the ability to come back and revise. Commissioner Stokes seconded. **Motion carried unanimously.**

President West thanked everyone and stated that was a very robust and important conversation. He thinks staff understands the urgency associated with this and need to discuss further.

Commissioner Belknap stated he wanted to make sure that it's clear when they come back in April, he would like to personally see in the new regulation that they're hoping to have written a report about where these subs are being used, what schools, how these districts are being affected and that they do have some type of accountability. He thinks that's really important, whether it's in April or May, but preferably April, to make sure he feels comfortable about the decision they just made.

The Commission recessed at 11:10 a.m. and reconvened at 11:20 a.m.

10. 9:05 A.M. WORKSHOP TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NEVADA ADMINISTRATIVE CODE (NAC) CHAPTER 391.XXX WHICH PERTAINS TO ENDORSEMENT AS AN EDUCATIONAL MENTOR.

Jeff Briske opened Public Workshop for amendments affecting NAC 391.XXX regarding a new educator mentor endorsement.

Mr. Briske asked Board Secretary Dylan Fuson if there is any public comment submitted via email regarding this item, and Mr. Fuson replied there are no public comment in written form at this time. Mr. Briske asked if there were any public comments in the south or north, Mr. Arakawa stated they have public comments in the south from Mr. Peter Wiens.

Mr. Briske stated this regulation was drafted by the Office of Educator Development, Licensure, and Family Engagement (EDLiFE) with input from several stakeholders including educator preparation programs, districts, employee associations, administrators, teachers, and the Nevada Association of School Administrators (NASA).

Mr. Briske stated these endorsements will offer a type of career ladder for both teachers and administrators. These endorsements were written in such a manner to complement career ladder pathways already developed by Washoe County School District (WCSD), NASA, the University of Nevada, Las Vegas (UNLV), and a career path that is being developed by Clark County Education Association (CCEA).

Mr. Briske stated he will now turn it over to Education Programs Professional, Anabel Sanchez in the South, who was instrumental in leading this work and who will summarize the proposed regulation.

Anabel Sanchez summarized the proposed regulation that would create an endorsement for an Educator Mentor:

- Section 1 lists the qualifications that a person must meet in order to obtain this endorsement as a Mentor Teacher.
- Subsection (a) requires a master's degree or at least 5 years of educational related experience.
- Subsection (b) requires a valid educational license in Early Childhood, Elementary, Middle, Secondary, Special Education, Career and Technical Education, or other licensed education personnel. Based on

feedback from their workgroups, they wanted to expand rather than restrict this endorsement to educators in any field.

- Subsection (c) requires at least 3 years of teaching experience.
- Subsection (d) requires effective or highly effective evaluations during the last 3 years.
- Based on research they have conducted and input from their stakeholders during work sessions, subsection (e) lists four areas of coursework required to obtain the endorsement. In addition to semester work offered at a college or university, the Department would also like to propose, based on additional stakeholder engagement that occurred after this draft language was proposed, that the required content could also be delivered as a professional development model for approved providers with equal time required in each area.
 1. Conceptual practices focus on change implementation, building structures, goal setting, decision-making, capability-building, and case study analysis.
 2. Relationship-building and adult learning, which were continuously mentioned in both research and workgroup discussions by way of integrating cultural responsiveness, equity, unbiased and implicit biases, trust, integrity, compassion, partnerships and community engagement.
 3. Practicum and technical functions of a mentor teacher: The purpose of this section is for mentors to demonstrate their application of knowledge in guidance for effective mentoring using various options, such as a Capstone project, portfolio, or micro-credential. For subsection (d), they realize that not all providers may have the same focus and not all districts may have the same needs. To that end, they allow some flexibility for the last coursework area. The options are coaching skills, instructional leadership, and instruction, skills, and competencies for educator mentors and leaders.

Ms. Sanchez summarized the regulation for the second section on Administrator Mentor endorsement language:

- Subsection (a) requires a master's or high degree in Education or a related field.
- Subsection (b) requires valid administrative license.
- Subsection (c) requires at least 5 years of administrative experience in a school or program.
- Subsection (d) requires effective or highly effective evaluations during the last 5 consecutive years.
- Subsection (e) lists the required coursework to obtain this endorsement in the following areas: The Department would like the Commission to consider that the delivery of the content can be offered as a Professional Development model as an alternative to college coursework as mentioned above.
 1. Conceptual practices.
 2. Relationship-building and adult learning.
 3. Coaching specific to communication skills, integrating feedback, support differentiation, reflection, and professional growth.
 4. Practicum and technical functions of an administrative mentor.

Ms. Sanchez stated she is available for questions and is joined by Mr. Briske in the north.

Mr. Briske thanked Ms. Sanchez and stated they are also joined by Dr. Jeff Giehs in the south, representing the Nevada Association of School Administrators who may make a brief statement and be available for questions of the commissioners.

Dr. Jeff Giehs thanked Mr. Briske, Mr. President, and members of the Commission for considering this today. He stated having heard all of their conversations this morning as a Commission and the tough decisions they have had to make, this is an effort that they're coming forward with in partnership to be proactive with educators to help bring some of the best people forward and make all educators that are interested the best they can be in their service to children. After hearing their last very difficult decision, the timing for this could not be more optimal. He thanked Ms. Sanchez for the summation and stated he is available for any questions.

Commissioner Belknap asked with this mentorship endorsement, is there a career pathway that's being build with this, is there any work directly with any of the school districts or is this just another endorsement that educators are going to put on their license.

Mr. Briske stated as he alluded to earlier, Clark County Education Association is currently developing a career pathway and have worked with them to develop this endorsement. They have stated they could use part

of this endorsement as that training. He stated as teachers work through their training, they could earn this endorsement at the same time. Washoe County School District also has a very similar training already in place, and they can certainly incorporate this into their training so that anyone who goes to the training would be able to earn this endorsement.

Mr. Briske stated the University of Nevada, Las Vegas has a Certificate program for advancement for educators, and those students who go through that Certificate program could very easily qualify for this endorsement as such.

Commissioner Belknap stated it sounds like they have talked with different stakeholder groups but are the districts at the table because he thinks that's his big question. He asked how do they incentivize educators to do this if they're doing an educator mentorship endorsement and this looks like a career path forward, isn't it important that they have the districts here at the table. He stated he thinks educator mentorship is hugely important and has worked as a mentor before within his building in the informal manner that CCSD does it, but he thinks it's important to get these districts here to make it meaningful and purposeful to actually show educators there's actually this career ladder that they can still be a classroom teacher, but yet they could be endorsed as a mentor, whether that comes with more pay or whatever. He stated he thinks it's important rather than just having another nice thing they can put on their resumes that this is actually impactful in their buildings. He stated he would also like to know how they would measure this program if they moved forward with it to know that this is a success. He stated these endorsements are great, but how do they incentivize people to do it and know it's making an impact and how do they get the districts on board if they haven't been at the table yet to actually know this is going to impact students.

Mr. Briske thanked Commissioner Belknap for the questions and stated he wholeheartedly agrees with him that they do consistently work with the districts to offer availability of endorsements for that purpose should teachers choose to go on this career path. They do realize that not all teachers, even if they are currently licensed as administrators, may want to go down that path as building leaders, but they do want to go down a path of being leaders and mentors for their peers, and that is why they created this from feedback from the field. He stated that Ms. Sanchez can speak to who was at the workgroup, but he believes they did include quite a wide path of stakeholders for this workgroup.

Ms. Sanchez stated that during their workgroups, they did invite multiple representatives from different school districts throughout their state. She stated when the regulation was drafted, they did email it to them to notify them that it was ready, so what they are previewing is also what the representatives were previewing. She stated as someone coming from the classroom a few months ago, this endorsement, especially the aspect of associating it with professional development, can be a high motivator because professional development credits can be turned into licensure renewal credits for license. She oversees the provider application process, and it can be conjoined, from her understanding. If anyone in the Education field is interested or ever thought about mentorship, now they can become a mentor and add this endorsement in addition to receiving PD credits for licensure renewal, and she thinks that's going to be a big component to motivate their educators.

Commissioner Belknap thanked the Department and stated he can see it will incentivize people to help them get their license and salary advancement, but that's all they're relying on to incentivize people to do this, he thinks it's a missed opportunity. He thinks mentorship and coaching from people that are in the trenches with you like this endorsement helps outline or at least puts some things together for an endorsement, but it's a missed opportunity that they can't make more meaningful and work with the districts to really try to make this as impactful as possible. He stated right now it just feels like another stamp on his license. He stated he is qualified to be a mentor, but what does that mean in his day-to-day working conditions or how does that help him advance himself in his career. Educators leave the career because they feel stagnated and providing a position and if they can work with the Department with these school districts to really build these out, you then have some vertical mobility in the profession that historically has had none, rather than going to administration where they can still continue to teach the children that you love to do but also mentor other educators to become better educators. He stated it's a great idea, but he thinks it's a missed opportunity.

President West stated this is a public workshop where they're gathering input to bring it forward to a public hearing at a later date. He stated if he has any thoughts to the proposed language, that would make it more meaningful. He reminded the Commission that they have a very specific task at hand. They review and try to

bring forth regulations that meet the intent and goals of whether it's the Legislature or filling a need that needs to be met. Unfortunately, they don't play a role in implementation or enforcement, so the goal here is to try and put the best information possible within the regulation so that their districts are able to take that and do the best with it.

Commissioner Davis stated she is super excited about this because she has always been a teacher mentor. She worked in her building as a mentor to other teachers, but then she also worked at the Early Childhood Department as a mentor, so she's really excited that she can actually get something on her license to show that she has the training to do this, even though she was trained by the Early Childhood Department, but she would use this as her license renewal. She stated it would be a really good opportunity for educators because when you're in the trenches, you know what it's like and you can give on-the-spot things instead of someone who hasn't been in the classroom. It's also more peer-to-peer, so it's not their administrator, and sometimes teachers are more open to listening to their peers. She stated she thinks this is great and she fully supports it.

Commissioner Wenger stated Ms. Sanchez had mentioned in her summary that it's not just semester credits and asked if she is drafting new language to include that PDE coursework availability specifically.

Mr. Briske stated they do need to post the proposed language 15 days ahead for regulations, so they do the best they can with the time and try to meet those deadlines, but engagement does continue. Upon further engagement with representatives at the districts, they thought that offering this as a Professional Development model from approved programs, it would allow for teachers to obtain this training and endorsement at a much reduced cost without having to obtain college coursework, which can certainly be an option as well, but they decided that this would be good language to add before it comes to public hearing.

Commissioner Wenger thanked Mr. Briske for that and stated she wanted to make sure that would be included. She asked in order for person to qualify in Section 1, would they have to meet all (a) through (e) criteria, and Mr. Briske confirmed yes.

Commissioner Wenger stated that in subsection (b), there is an "other educational license personnel" included and she does appreciate that inclusion; however, not all OLPs have teaching experience. She stated that she's not a licensed teacher and many counselors and social workers are also not licensed teachers and do not have teaching experience, so she does not know if the language could be worked out for those professionals that also need mentorship to be allowed the possibility of this endorsement.

Mr. Briske thanked Commissioner Wenger for the feedback and stated he would like to engage in that conversation with her outside of meeting to make sure they get the language right for the public hearing.

Commissioner Belknap stated that 3 years of teaching experience is a little bit on the low side and is not enough to be acting as a mentor. He believes it should be closer to 5 years. He stated every experienced teacher he's talked to has said that by year 3, you finally understand what's going on. He stated that's just his personal opinion because in 3 years, that's when you're off of probation in CCSD and having a couple of more years would benefit and have a little bit more experience to share with those new teachers.

Commissioner Wenger stated she would also like to echo that comment. When she got into this career, people always told her that there's a 5-year learning curve, and she's actually in her 6th year and can speak that she feels very confident in her position for the first time, so she thinks 5 year would be a good starting point.

Ms. Sanchez stated the 3 years was suggested at one of their workgroups, which was originally 5 years and asked would 3 to 5 years work or just 5 years of teaching experience.

Commissioner Wenger stated she would recommend the 5 years, and Commissioner Belknap concurred. Commissioner Tucker stated she also agrees with the 5 years.

President West asked if there were any other questions, comments and suggestions, and there were none.

Motion: Commissioner Wenger moved to approve the Educator Mentorship Endorsement regulation to Public Hearing as amended to change from 3 years of teaching experience to 5 years and include the Professional Development Model in lieu of the semester credits as written. Commissioner Davis seconded.
Motion carried unanimously.

Mr. Briske closed the Public Workshop for amendments to NAC 391.XXX regarding a new educator mentor endorsement.

11. 9:10 A.M. WORKSHOP TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NEVADA ADMINISTRATIVE CODE (NAC) CHAPTER 391.XXX WHICH PERTAINS TO STUDENT TEACHING AND PSYCHOLOGY INTERNSHIP.

Jeff Briske opened Public Workshop for amendments affecting NAC 391.XXX regarding student teaching and school psychology internship which pertains to Senate Bill 352 (2021).

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) with input from several stakeholders including educator preparation programs, school districts, administrators, teachers, paraprofessionals, and the psychology department at Clark County School District. The purpose of this regulation is to allow support staff already working in schools an equitable opportunity to realize the next step in their career path to become licensed teachers and licensed school psychologists. Another part of this regulation allows The Department to consider student teaching or other teaching experience in another state or country which may qualify a candidate for a license in Nevada.

Mr. Briske stated he will now turn it over to Education Programs Professional, Anabel Sanchez in the South who was instrumental in leading this work and who will summarize the proposed endorsement.

Anabel Sanchez summarized the proposed regulation regarding student teaching and school psychology internship, which pertains to Senate Bill 352:

- Section 1 allows for a paraprofessional to complete an accelerated program of student teaching to qualify for an initial license while remaining employed with the following requirements:
 - o Subsection (a) requires enrollment in a teacher preparation program.
 - o Subsection (b) requires having student-teacher instructional duties and practice in the same or similar area in which the paraprofessional is employed.
 - o Subsection (c) requires completion of the student-teacher program as determined by the preparation program.
 - o Subsection (d) requires the paraprofessional to compete student teaching at the same site where they are employed and as requested by their education preparation programs.
 - o Subsection (e) requires ongoing support and feedback from the classroom teachers and cooperating teachers.
- Section 2 allows that a person may qualify for a license having completed student teaching or other teaching experience in another state or foreign country if the experience fulfills the requirements of a program of student teaching as determined by the Department.
- Section 3 allows school psychology interns providing services and support while enrolled in a program to obtain a license or endorsement to complete such a program of internship while remaining employed.

Ms. Sanchez stated she is available for questions and joined by Mr. Briske in the north.

Mr. Briske thanked Ms. Sanchez and stated if Ms. Michelee Crawford is available in the south, he would invite her to the table to answer any questions the Commissioners may have.

Commissioner Wenger stated she was really happy to see this regulation proposal. She stated she can speak to the fact that the Psychological Services Department at CCSD does have a lot of paraprofessionals that help school psychologists on a daily basis, such as give assessments and do parent interviews. She knows that several of them are currently enrolled at a school psych program at UNLV, so she thinks this would have a direct impact on those individuals.

Commissioner Wenger asked if this is specifically targeting those looking for licensure in Early Childhood, Elementary and Secondary as those are the only licenses listed in Section 1. Mr. Briske replied if she's referring to the NAC listed there, they will happily take a look at that to ensure that they include all teachers, including Special Ed, Early Childhood, Elementary, Middle and Secondary. He thanked Commissioner Wenger for bringing that to their attention and stated they will make sure that gets in there. He stated when the motion is made and the Commission moves this forward, he asked the Commission to please make that amendment to include all of those licensure areas.

Commissioner stated that was going to be her one area of questions because they do have a lot of need in their Special Education programs, so if those paraprofessionals in those programs want to become certified teachers, she would welcome that.

Commissioner Belknap asked do they know the number of paraprofessionals and school interns that this will impact currently and what's the projected impact on their educator pipeline with this new regulation.

Mr. Briske stated he knows that UNLV put out an application for their paraprofessional pathway that they're currently doing, and they have had at least 1,200 people apply, and they don't have slots for all of them at this point. He knows that they are expanding rapidly, and he believes their other NSHE institutions may design some programs in the future to serve those students. He asked Ms. Crawford if they could have some additional information as she put this law together with Senator Dennis.

Michelee Crawford stated they had about 1700 respond and several more that did not. She stated during the building of this bill, they did have the School Psychology Department weigh in, and they stated they had 36 interns that were going through licensure. Currently, they cannot do a lot of bilingual Special Ed testing, and three-fourths of their interns coming in were bilingual, so it would have a tremendous effect on their Special Ed testing population.

Commissioner Roberts stated she wanted to add that the initial group that went in were 36 teachers and approximately a third of each from Early Childhood, Special Ed, and Elementary. The second group started in the spring, and there were 100 of them. They are projecting to have that many each year.

Commissioner Davis stated she is in full support of this. She stated she worked with an amazing teaching assistant for 7 years, and she's still a teaching assistant because she's a single mom and couldn't afford to take time off to do student teaching, so she knows this will be impactful for a lot of their paraprofessionals who are looking to get their teacher license and be a teacher in whatever district they decide. She thanked the Department for putting this together.

Motion: Commissioner Wenger moved to approve moving the student teaching and school psychology internship regulation to Public Hearing with the addition of Special Education certification. Commissioner Belknap seconded. **Motion carried unanimously.**

Mr. Briske closed the Public Workshop for amendments to NAC 391.XXX regarding student teaching and school psychology internship which pertain to SB 352 (2021).

12. 9:15 A.M. WORKSHOP TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.065 – RENEWAL OF LICENSE: EDUCATIONAL AND PROFESSIONAL REQUIREMENTS; EXCEPTIONS; NAC CHAPTER 391.315 – ENDORSEMENT TO SERVE AS SCHOOL PSYCHOLOGIST: GENERAL QUALIFICATIONS; RENEWAL; AND NAC CHAPTER 391.XXX – WHICH PERTAINS TO SENATE BILL 151.

President West stated as previously discussed, they will skip Item 12 on the agenda until a later date.

13. 9:20 A.M. WORKSHOP TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.223 – ENDORSEMENT TO PROVIDE AUDIOLOGICAL SERVICES; EXCEPTION; NAC CHAPTER 391.305 – ENDORSEMENT TO SERVE AS SCHOOL NURSE; NAC CHAPTER 391.320 – ENDORSEMENT TO SERVE AS SOCIAL WORKER; AND NAC CHAPTER 391.370 – QUALIFICATIONS FOR TEACHING PUPILS WHO HAVE SPEECH AND LANGUAGE IMPAIRMENTS.

Jeff Briske opened Public Workshop for amendments affecting licensure endorsements in NAC 391.223 audiology, NAC 391.305 school nurse, NAC 391.320 school social worker, and NAC 391.370 speech-language pathology.

Mr. Briske asked Board Secretary Dylan Fuson if there is any public comment submitted via email regarding this item, and Mr. Fuson replied they have received several written-in public comments regarding adding school psychologists to the list of professionals that will be made exempt from the Praxis competency tests as well as support for social workers being exempt. Due to the volume of these comments, they have provided this brief summary, which have also been shared with the Commission members and will be reflected in their records.

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) and the Office of Safe and Respectful Learning Environment with input from several stakeholders including educator preparation programs, school districts, administrators, other educational licensed personnel including school nurses, social workers, speech-language pathologists, and the Nevada Speech and Hearing Association. The purpose of this regulation is to remove testing barriers to licensure for school audiologists, nurses, social workers, and speech-language pathologists. These four groups of professionals in addition to the school Mental Health professionals already have professional licensing boards that require competency testing and licensure renewal requirements to maintain their professional occupational license.

Mr. Briske noted that school psychologists and school counselors do not hold clinical licenses and are only licensed through the Nevada Department of Education (NDE) and not the Board of Examiners (BOE), thus they do not have competency testing through that board. This is why these professionals were not included in this proposed regulation.

Mr. Briske introduced Amber Reid, Education Programs Professional from the Office of Safe and Respectful Learning Environment, who was instrumental in leading this work to present the proposed changes for audiology, nurses, and social workers. He suggested when she has presented the first three-fourths of the bill, he would like to suggest a pause for possible questions before they invite the speech-language pathologist to present changes to their portion of this regulation.

Amber Reid stated she's an Education Programs Professional in the Office of Safe and Respectful Learning Environment at the Nevada Department of Education. It is her pleasure to share some of the requested amendments they have worked with their stakeholders on regarding the competency testing requirements found in NAC 391.036. She stated there are several reasons that this issue came to their attention. She stated many of them may remember the Social Workers in Schools (SWxS) State Block Grant which was created in the 2015 Legislative Session. In the process of administering that State Block Grant, they went from a total of 29 social workers or other mental health workers in the entire state to over 400 in a 3-year period, which was pretty remarkable.

Dr. Reid stated as Director Briske mentioned, social workers are primarily licensed by the Board of Examiners for social work and in order to receive an endorsement from the Department of Education to work in a school setting, the first requirement is that you hold a license from the BOESW. In order to qualify for a license from the Board of Examiners for Social Work, there are a number of requirements, such as the completion of a bachelor's or master's program, submission of the fingerprinting for the background check, etc. but there is a national licensing exam that comes with that requirement, so in order to be licensed at the bachelor's level, you have to take and pass the national licensing exam for a Bachelor's of Social Work licensee and the same holds true for a Master's in Social Work as well as at the clinical level and the independent level. There are four different licensee exams within the Board of Examiners for Social Work to demonstrate your competency to practice within that scope of work associated with that license.

Dr. Reid stated when they rolled out the Social Workers in Schools Grant, they encountered a slight challenge in the tests of competency requirements that are found in the NAC 391.036, specifically as written, they

require the passage of a Praxis, the Praxis Core, or a GRE with the previous 5 years. Many of their graduate schools in recent years have stopped requiring a GRE for admissions, so they had a number of graduates from their Schools of Social Work in the state at the master's level who had never taken a GRE, and therefore, couldn't clear that initial hurdle in terms of demonstrating competency pursuant to NAC 391.036. In speaking with Director Briske and their stakeholders, the intent of 036 is to demonstrate that you are competent that you hold the skills necessary to practice in your field, and when this section of NAC was initially written and conceived, she thinks it was originally targeted at licensed classroom teachers. As they have expanded the number of personnel that are not classroom educators, such as counselors, social workers, psychologists, and school mental health workers, and all of the support staff that really need help alleviating some of the stressors that are being added to their classroom educators, there needs to be some updating to this section of the NAC so that they can remove one of those barriers and hurdles that they're having in moving some of those licensees from their provisional license to a regular license. The intent of 036 is to demonstrate competency, and in the field of social work, mental health, nursing, speech-language pathology, your competency is going to be better demonstrated by the passage of your licensing exam than a Praxis Core, which is basic fundamentals of Reading, Writing, and Math. As a result of many graduate schools no longer requiring the GRE, what they have is a number of provisional licensees that are being required to take an additional exam with the Praxis Core. She stated they've already gone through the multistep of receiving their license from their licensing board in the state, which is the Board of Examiners for Social Work, Audiology, Psychology, MFTPC, Nursing, etc. that have already gone through that process, checked all the boxes for their professional licensing board that includes a licensing exam and all the costs associated with that. When she completed the first round of that after she completed her master's program, that tallied up to about \$300. She then got to do it all over again for the State Board of Education to have an endorsement as a school social worker.

Dr. Reid stated the request with these amendments is to allow for the licensing exam that is required for the initial license from the professional licensing board in the State of Nevada to stand in place of the test of competency in lieu of the Praxis or the GRE in that section of NAC that it is currently written.

Mr. Briske stated as he suggested before, he would like to take a pause before they bring the speech-language pathologists for their portion of the bill. If there are any questions or comments from the Commission that can either be directed to him or Dr. Reid.

Commissioner Wenger stated in her description of the changes, she targeted the Praxis, but then there is also the 391.065, which is the license renewal piece for each of these job classes and asked if she understood their renewals would really be on their respective State Board licensing rather than on NDE.

Dr. Reid stated that's a great catch. She stated what is similar to what is already in NAC 391 for their school mental health providers and school social workers, the requirement to maintain your license from the Board of Education is that you maintain your license from your professional board and you provide a copy of that license to the Department of Education so that's existing policy for their school mental health workers as well as their school social workers. That cleanup language is meant to align all of those licensees with the same type of language so that the requirement was very clear. That is existing practice already for many of these professionals, where their continuing education requirements are held first at their professional licensing board and came into effect for social workers in 2013 in an effort to decrease the barriers to continue licensing that they were having for their social workers in Clark County School District at the time where they were essentially required to do double duty on their continuing education requirements.

Dr. Reid stated for the purposes of their endorsement as a school social worker, those continuing education requirements at that time had nothing to do with their practice as a school social worker and were more appropriate for a classroom educator. They were being asked to do continuing education requirements on literacy, language acquisition, or math skills rather than skills that would be more appropriate for a school social worker. Those examples include in statute in their licensing requirements for social work things like suicide prevention and post-vention, substance abuse, use and abuse and prevention, crisis response, which

are much more appropriate to the practice of school social worker, school mental health worker, nurse, speech-language pathologist, than the traditional educational requirements that are outlined in 391.065.

Commissioner Wenger thanked Dr. Reid and stated she has gotten a lot of emails from people, such as social workers, asking her to please support this as there are a lot of barriers, and they definitely need more school social workers, so she is excited to potentially remove these barriers.

Dr. Reid noted they have quite a few provisional school social work licensees whose provisional licenses are set to expire over the next several months. Twelve of them are currently in the Carson City School District, so they are trying to make sure they can get these regs across the goal line as soon as possible so that they're not putting an extra burden on their districts and school partners at a time when these services are more needed than they ever have been as a result of the stressors that their educators and students have endured over the last couple of truly unique educational years. They want to make sure they're doing their part and honoring their stewardship as a Department to address those barriers in a way that will decrease the stress and burden on their LEA partners.

Mr. Briske stated as the speech-language pathologists are making their way up to the podium both in the north and south, he would like to ask the Commissioners to refer to the updated proposed language for NAC 391.370 that was sent prior to this meeting. The proposed language was updated as a result of ongoing stakeholder engagement that continued after the 15-day required posting.

Kim Redding stated she is the Nevada Speech-Language-Hearing Association (NSHA) President. She stated they prepared a PowerPoint presentation to give them the background information on what ASHA, their state association, is requesting. She stated earlier in public comment, there were a lot of acronyms thrown around and explanations in support without any background, so she will quickly skim through it and answer any questions they may have.

Ms. Redding stated CCCSLP is the top of their licensure where speech-language pathologists have a master's degree and are nationally recognized through their American Speech-Language-Hearing Association (ASHA), which is their big national association that credential and is the governing body that sets the standards for speech-language pathologists across the country. The CCCSLP is the only professional that is called a speech-language pathologist. In the past, they have called someone with a lesser license as a speech-language therapist. A speech-language pathologist is one with a master's degree and credentialed by ASHA. Nevada is the only state in the U.S. that still allows a person with bachelor's degree to provide speech and language services in a school setting. The rest in the nation has come along in the last 15 years and have raised that bar to make it a master's degree as a qualifier. This allowance was adopted prior to 1981 based on personnel shortages and up until this point, they haven't been able to gain on those personnel shortages, and they are finally in a position where they can. Their professional licensing board is the Nevada Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board, and they refer to it as NVB or the NV Board. They're the ones who gives them a license to practice in the state, very much like what Amber was speaking about for social workers, that's who provides them their license to practice and allows them to practice in a medical setting, practice setting or school setting. She stated they are only allowed to get that if they have a master's degree.

Ms. Redding stated as she alluded to earlier, Nevada finally has two master's degree college programs. Nevada State College opened it's Speech Pathology Program in the fall of 2019, and they graduated their first master's level clinicians in December of 2021. Fifteen to 20 more students are on track to graduate in May 2022 and then an additional 25 in August. They have different tracks for part-time students who are working in the schools and gaining their master's degree as well. The University of Nevada, Reno also graduates between 20 and 25 each May. In May 2021, they had 21 graduates, and this coming May, they're set to have 23 graduates. Within the next year alone, Nevada will have an additional 80 master's degree clinicians from their NSHE programs only, so that's exciting news and definitely shows they have master's degree clinicians up and coming. With additional opportunities online, which is only speaking to their NSHE partners, they have 18 master's degree online programs for Speech Pathology as well.

Ms. Redding stated regarding Medicaid reimbursement for school-based language services, currently Medicaid requires providers to hold a certificate of clinical competence called our Cs or a license from their State Board. Lesser qualified providers must have Medicaid supervisors because they practice under the direction of that person's license. Currently, in Clark County, they have 15 people who have their C's are at the top of their licensure are supervising some of their bachelor's level therapists. In Washoe County, they don't have quite the extensive amount of bachelor's level clinicians, but it still requires almost a full-time person to monitor and mentor those people. Their big goal for changing NAC 391.370 is to increase the eligibility for teaching students with speech-language impairments to allow only the CCCSLP, the clinical fellow that's first year out of graduate school that they're mentored and supervised, and those who carry licenses in other states, to be the ones that are licensed as speech-language impairment providers. She stated that CCCSLPs and SLPS would hopefully be exempt from competency tests requirements as Amber Reid spoke about earlier because they do hold that Nevada Board license. Current licensees who meet previous criteria would be able to maintain those NDE licenses and continue to get their renewals and have jobs. It would be for only those up and coming.

Ms. Redding stated they spoke in a stakeholder meeting about a date for that and talked to NSC to see where they were at in a graduate track, and the date they gave them was September 30, 2025, as a sunset date for making this their new requirement.

Mr. Briske stated he will go through the changes as Ms. Redding mentioned and asked them to refer specifically to the updated regulation that was sent to them in their member packet.

- The date will be updated from September 30, 2023 to September 30, 2025 to allow time for Nevada State College students to graduate and apply for a license and will become effective when adopted by the Legislative Commission through September 30, 2025.
- The language previously referring to "pupils" will be updated to "students".
- The language of "have completed a program of preparation" will be removed. This was not necessary if they hold their master's degree or higher in speech-language pathology, communications disorders, or equivalent from a college university that has been accredited by ASHA.
- In subsection (b), a standard or professional license which would allow for those clinical fellows who does not yet have their clinical test of competency.
- On the following page, on the first part of this section, number 3 exempts them from testing in 391.036 and 391.065, renewal requirements, because they already have those requirements in their own licensing board.
- The second part of the regulation for 391.370, the date would change to assist with graduating and teaching out students at Nevada State College, effective October 1, 2025. This would eliminate, as discussed, the bachelor's pathway to ensure that they are only licensing speech-language pathologists who are fully licensed, and they're not the only state in the nation to have under-licensed SLPs helping their students.

Commissioner Wenger stated she wanted to make sure she heard correctly that those who have their Cs and have these Praxis provisions, if they pass this, those provisions would be removed from their license. Mr. Briske confirmed that Commissioner Wenger's understanding was correct upon adoption by the Legislative Commission.

Commissioner Wenger stated she also has some concerns about the Praxis and wanted to make sure she understands this correctly. She asked would the bachelor's level speech pathologist still be required to pass the Praxis Core exams along with that content specific to speech pathology.

Mr. Briske replied that is correct, until the effective date where that pathway is eliminated.

Commissioner Wenger stated she has some concerns about that because they are acknowledging that C-level speech pathologists wouldn't need to take Praxis exams because it's not indicative of what they do on a daily basis, but they're still keeping that provision for bachelor's level speech pathologists in that same role. She asked if there a way to remove those Praxis requirements for all speech pathologists regardless of their level.

Ms. Redding stated one of the things about those bachelor's level clinicians or speech-language therapists is that they don't have the same rigorous program for graduate school with speech-language pathology that they do, so having them still take that Reading, Writing, and Math is a different assurance to work with those students in an educational setting different than that speech-language pathology. She stated the people that are coming over with a bachelor's are teachers as well, and as part of the College of Education, the way that Nevada State College sets up their programming, they often times already have that Reading, Writing, and Math. At the master's level, they are looking at that clinical certificate of competence that gets you out of the Reading, Writing, and Math.

Dr. Reid added that the Praxis Core and GRE test of competency requirements are only being waived for those professionals that already take a licensing exam, so a bachelor's level SLP has not taken a licensing exam as part of their professional license from the State Licensing Board. Social work is the only field between psychology and MFTPC that licenses bachelor's level practitioners. They have a much more limited scope of practice within that license, but they do take a licensing exam. As Director Briske mentioned earlier, for their professionals that do not take a licensing exam as part of their professional licensing process, the Praxis Core and the GRE cannot be removed because they don't have an exam that would meet the intent and requirements of 036 regarding a test of competency.

Commissioner Wenger stated she's gotten a lot of emails and concerns regarding the Praxis Core for their OLPs, not just the ones that are included in today's public workshop and stated she understands the rigor of a graduate program. As a school psychologist, she went through a very rigorous program that is above a master's and she's still getting those Praxis Core on their license, but Reading, Writing, and Math were not part of their daily jobs, and it's definitely a barrier for recruiting those other licensed professionals. She suggested the Commission brings that issue to a meeting in the future to potentially remove those Core Praxis exams. They've already removed the teaching principals from their licenses, so that's just an issue she would like to bring up to the Commission.

President West asked if there were any other questions or comments and there were none.

Motion: Commissioner Wenger moved to approve moving the amendments in NAC 391 for Other Educational Licensed Personnel to Public Hearing to include the changes to the date as amended. Commissioner Belknap seconded. **Motion carried unanimously.**

Mr. Briske closed the public workshop for amendments to NAC 391.223, 391.305, 391.320, and 391.370 regarding testing and renewal requirements for Other Educational Licensed Personnel.

14. FUTURE AGENDA ITEMS

Mr. Briske stated as mentioned a few times during this meeting, proposed amendment to NAC 391 as it pertains to licensure renewal requirements for school psychologists and school counselors per Senate Bill 151 (2021) will be brought to a future meeting.

Other future meeting items may be:

- An update from Educational Testing Service regarding multi-state test reviews;
- Possible Licensure updates for Bachelor Level Speech Therapists, Teacher Residents, and School Psychology Interns;
- Public Workshop for NAC 391.277 and 391.279 as pertains to Occupational and Physical Therapists;
- A Public Workshop as it pertains to Assembly 225 (2021)
- Bring back the Emergency Sub regulation for workshop
- Names have been submitted to the Governor for appointment for our current Commission vacancies and for members who have termed out and continue to serve until a replacement can be appointed. If members are appointed, we will welcome them at a future meeting.

15. PUBLIC COMMENT #2

There were no public comments in the north or south.

16. ADJOURNMENT

Motion: Commissioner Belknap moved to adjourn the meeting. Commissioner Dave seconded. **Motion carried unanimously.** The meeting adjourned at 12:33 p.m.

APPENDIX A: STATEMENTS GIVEN DURING PUBLIC COMMENT

1. Michele Cruz-Crawford, Clark County School District, provided a public comment regarding SB352.
2. Verona Sutton-Dunn, Clark County School District, provided a public comment regarding NAC 391.370.
3. Karen Klopfer, Nevada Speech Hearing Association, provided a public comment regarding NAC 391.370.
4. Jennifer Hodges, Washoe County SLP, provided a public comment regarding NAC 391.370.
5. Nancy Kuhles, NSHA Coalition, provided a public comment regarding NAC 391.
6. Kate Schum, Washoe County School District, provided a public comment regarding the emergency sub regulation.
7. Marissa McClish, Washoe County School District Professional Growth Systems Project Coordinator, provided a written-in public comment regarding endorsement as an educational mentor.
8. Daniela Felsenfeld, Clark County School District, provided a written-in public comment regarding tests of competency proposed amendments.
9. Dorothy Parriott, PhD, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
10. Samuel Thompson, PhD, provided a written-in public comment regarding Praxis exemptions for school psychologists.
11. Brendon Ross, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
12. Gene Zalar, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
13. Jessica Peck, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
14. Jennifer O-Dell, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
15. Michael Rube, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
16. Alayna Sacca, Clark County School District provided a written-in public comment regarding Praxis exemptions for school psychologists.
17. Nicole Kelley, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
18. Hannah Krantz, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
19. Ginger Shaffer, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
20. Stephanie Uhl, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
21. Tamara Filangieri, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
22. Christina Blose, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.

23. Sasha Bisda, Clark County School District provided a written-in public comment regarding Praxis exemptions for school psychologists.
24. Camille Layseca, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
25. Ruth Brinkerhoff, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
26. Jasmine Mitchell, Clark County School District, provided a written-in public comment regarding Praxis exemptions for school psychologists.
27. Tiffany McDougall, Nevada English Teacher, provided a written-in public comment regarding NRS 391.019.
28. Alisha Askin, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers.
29. Ryan Sanshuck, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers.
30. Lorenthia Clayton, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers.
31. Savannah Cortner, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers.
32. Alexis Hellman, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers.
33. Habtamua Assore, Clark County School District, provided a written-in public comment regarding licensure requirements for school social workers.
34. Elissa Couch, Nye County School District, provided a call-in public comment regarding Agenda Item #12.
35. Peter Wiens, University of Nevada, Las Vegas, provided a public comment regarding NAC 391.XXX.

Item A1, Michele Cruz-Crawford

Summary of Public Comment:

Ms. Cruz-Crawford introduced herself and said she's a CCSD principal who also oversees Diversity, Equity and Inclusion for the state of Nevada Airforce Guard as an officer in the U.S. Airforce. She stated she's speaking on Agenda Item #11 pertaining to student teaching and Psychology internship in regard to SB352 that passed unanimously this last legislative session. This is a bill that she wrote because it affects their teachers. At her school, she has predominantly minority/majority students, but her staff is not. When she researched and put out a survey to the district, she had 1700 respondents saying that they are diverse but not in the classroom because they cannot stop work and take off 16 weeks to do student-teaching. This legislation allows people to work and maintain their benefits while doing their student-teaching.

Ms. Cruz-Crawford shared that Jerania Mancilla, a first generation college student who works at her school, is a paraprofessional and currently a Resource teacher taking two education classes a semester to become a teacher. She stated it will take her 12 years to obtain licensure instead of 4 years. She has experience with students with IEPs and teaching in one of their neediest schools. Ms. Cruz-Crawford urged them to write regulation that will allow their paraprofessionals who have experience in the classroom and deserve the support they can give for the people that show up every day, live in the communities, and know their students.

Ms. Cruz-Crawford shared that Jennifer Lopez, a first generation college graduate and Mexican immigrant, has worked as a paraprofessional in the Resource position at her school for the last four years. She cannot afford to take 16 weeks off for student-teaching but within her role, she can provide push-in resource minutes in the general education classes she supported. The classroom teacher allowed her space to create lesson plans, communicate with parents, and navigating the grading of students. Because of the relational trust, Ms. Lopez already had with parents, the classroom teachers and students, she had the most in-depth student-teaching experience that she's ever witness in her 8 years as an administrator. Paraprofessionals live in the community they work, they get paid on average \$14/hour to start, and they cannot afford to take off 16 weeks to student-teach. This regulation costs the state nothing but provides a whole lot in return. This is an innovative, common sense regulation that will raise the standard because in-service hours translate to student success. Paraprofessionals have years of classroom experience, and this year, she hired Ms. Lopez as a Kindergarten teacher, and she is more prepared than any 1st grade teacher she's ever hired.

Item A2, Verona Sutton-Dunn

Summary of Public Comment:

Verona Sutton-Dunn introduced herself as Director of Speech-Language Therapy Services Department within the Clark County School District and stated her public comment is in reference to NAC 391.370, Agenda Item #13. She stated CCSD has the utmost appreciation for Nevada State College (NSC) which has trained and produced for them nearly 200 lesser licensed post-bacc practitioners that have filled their Speech-Language Pathology (SLP) positions during their critical staffing shortages. They plan on continuing all of their collaborative endeavors with NSC and other universities including practicum experiences for post-baccalaureate and master's candidates. They will support NSC in any way possible during Nevada's transition to full licensures for all SLPs. CCSD bears the burden of hiring, training, and retaining these lesser licensed practitioners.

Ms. Sutton-Dunn stated these lesser licensed practitioners require additional training and specialized mentoring support for up to three years to meet all job requirement standards. They are restricted from administering certain standardized tests and making diagnostic decisions. They are not recognized by the Nevada Medicaid as qualified independent providers during the oversight and signature of a Certificate of Clinical Competence (CCC), the nationally recognized licensure for a speech-language pathologist. Because of lesser licensed practitioners, they are not permitted to engage in telepractice. She stated they must put their first responsibility towards their students receiving services who are deserving of a full credentialized Speech-Language Pathologist license.

Ms. Sutton-Dunn stated CCSD dedicates 15 full-time CCC SLP positions to mentoring and supervision needs of their lesser licensed staff and candidates. Their goal is to reduce this allocation to 8-10 in the next five years with the eventual goal of not needing these supervisors at all. In the last two years, CCSD has seen dramatic shifts in hiring in proportionality of licenses across new hires. For the 2021 school year, CCSD hired 36 CCC CFs and SLPs and only 23 post-bacc SLPs. CFs are Clinical Fellows who have already completed their master's and are doing their year-long externship that's required. For the 2021-2022 school year, CCSD has hired 24 fully credentialed CCC and CF SLPs and only 12 post-baccs.

Ms. Sutton-Dunn stated CCSD forecasts that in the coming school years, they will not only need fewer proportionality bachelor's level practitioners, but they will also need to shift resources away from recruitment and training of NAC post-baccs towards supporting the retention of full licensure acquisition of their current post-baccs and fully credentialized employees.

Ms. Sutton-Dunn stated that CCSD requests the following changes to NAC 391.370:

- 1) Not require the Praxis Reading, Writing, and Math for CFs, SLPs, or CCC SLPs who are applying to the district;
- 2) Not require GR resource for new licensed applicants who are CCC SLPs or CF SLPs;
- 3) Set an end date in which new bachelor's level therapists are no longer hired in the district for master's level positions to occur no later than June 30, 2025. This date would provide the students currently in bachelor's and post-bacc programs the opportunity to graduate.
- 4) Allowance for current post-bacc licensed holders to retain and renew licenses so they may remain employed for the natural duration of their careers.

Item A3, Karen Klopfer

Summary of Public Comment:

Karen Klopfer introduced herself as a speech-language pathologist from Clark County School District. She is representing the American Speech-Language Hearing Association State Educational Advocacy Liaison and the constituents of the Nevada Speech Hearing Association and stakeholders who are concerned and have input regarding the proposed changes to NAC 391.370, specifically, sections 2(d) and 2(e), regarding the lesser licensed practitioners that are currently allowed to license and practice as speech-language pathologists in Nevada schools.

Ms. Klopfer stated she is representing three of their stakeholders. One of the stakeholders is the general constituents of the Nevada Speech Hearing Association who are unanimously supportive of the end date of the bachelor's and post-bacc level practitioners being allowed to practice in their schools. She is also speaking on behalf of Nevada State College's Speech-Language Department who has given an extensive statement regarding the proposed changes to 391.370 stating that they feel any changes to the regulation should be implemented only once Nevada State College has an available program for the SLP Assistant Program. Currently, Nevada State College has a bachelor's and post-bacc program, which currently allows practitioners to get the educational SLP license, in addition to a newly implemented master's program.

Ms. Klopfer stated Nevada State College is requesting that any changes to NAC 391.370 occur once they have been able to pivot to an SLP assistant position. They feel this is critical because Clark County's continued critical staff shortage and the resources of their current undergraduate students can then be shifted to a prepared and well-trained SLP assistant-level position, which is in alignment with the American Speech Hearing Association and would be an alternative to their current course towards the post-bacc educational license. They also believe this would provide economic stability for the current undergraduates in program who may not be able to attend graduate school to receive the full certification.

Ms. Klopfer stated Nevada State College believes the end date of 2(d) and 2(e) should occur no earlier than June of 2024 with the primary reason being that Nevada State College is currently in candidacy for accreditation for their master's program and would need to pivot their curriculum, requiring 1-2 years to correct their school catalog to change from the current post-bacc plan to the assistant SLP plan. Nevada State College also requires that their current student body seeking bachelor's or post-bacc endorsement for an educational SLP be allowed to provisionally continue and receive the educational endorsement by way of NAC 391.370 through June of 2026. These are the positions of Nevada State College. They are currently awaiting the written statements from the University of Nevada, Reno, which also offers the master's program in Speech Pathology. While they're waiting for the written statement, they have had verbal confirmation that UNR is fully supportive of an immediate change to the higher licensure requirements of NAC 391.370 requiring the master's degree certification, the CCC clinical certification and/or a state license in another state. UNR has stated that they are onboard with immediate transition.

Item A4, Jennifer Hodges

Summary of Public Comment:

Jennifer Hodges introduced herself as the Special Education Administrator overseeing the speech pathologists in Washoe County and stated she is speaking on Agenda Item #13, NAC 391.036 and 391.06. She stated in the last five years, Washoe County has hired proportionately fewer bachelor's level clinicians, which is due in part to the mentoring and supervision requirements that are required for these bachelor's level employees, which require specialized support and additional supervision for the purposes of Medicaid billing. Master's level speech-language pathologists help a school district's and charter school's ability to access Medicaid funding to support the provision of a wide-range of services needed to educate students with disabilities and ensure compliance with IDEA requirements. Washoe County is in full support of this change to the licensing requirements and the increase in standards

Item A5, Nancy Kuhles

Statement of Public Comment:

My name is Nancy Kuhles. I am a Speech-Language Pathologist and Co-Chair of the Nevada Speech-Language-Hearing Association (NSHA) Coalition to Address Personnel Shortages.

I would like to address Item # 13 on the Commission of Professional Standards agenda, specifically NAC 391.370 the proposed regulation to exempt certain licensees from additional competency testing and proposed regulation to amend standards to obtain a Speech-Language Pathology education license.

On behalf of the NSHA/NV Coalition to Address Personnel Shortages, I am in support of the following individuals who hold only a special education license with an endorsement to provide services to students who have speech and language impairments to be exempt from the requirements of NAC 391.036 and 391.06. These special education licensed individuals include a master's level Speech-Language Pathologist who holds an American Speech-Language-Hearing Association (ASHA) Certificate of Clinical Competence (CCC) or a standard or provisional license from the Nevada Speech-Language, Audiology and Hearing Aid Dispensing Board; or a person who holds a license or certificate, issued by another state, as a speech-language pathologist with an endorsement to teach students who have speech and language impairments.

- This exemption will assist in removing a barrier to recruiting master's level Speech-Language Pathologists (SLPs) who have been practicing in other settings, recruiting more experienced SLPs, recruiting SLPs completing their ASHA Clinical Fellowship Year (CFY) and remove a barrier to Nevada school district employment.

The NSHA/NV Coalition to Address Personnel Shortages supports the amendment to change licensing qualifications for speech-language pathologists to a master's degree or higher in Speech-Language Pathology, and holds an ASHA Certificate of Clinical Competence (CCC) or a standard or provisional license from the Nevada Speech-Language, Audiology and Hearing Aid Dispensing Board; or a person who holds a license or certificate, issued by another state, as a speech-language pathologist with an endorsement to teach students who have speech and language impairments.

- This change to licensing qualifications will not affect licensees who hold a license in effect on the date the new regulation becomes effective (NRS 391.019; 3 (c)).

Nevada school districts seek Medicaid reimbursement for speech-language pathology services provided in districts and charter schools. Children and youth who receive Medicaid-eligible speech-language pathology services must receive them from speech-language pathologists who meet Medicaid qualified provider requirements. These Medicaid qualified providers are master level speech-language pathologists holding a Certificate of Clinical Competence (CCC) from ASHA or a license from Nevada Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board. Lesser qualified providers must have a SLP Medicaid Supervisor, and practice "Under the Direction of."

If speech-language pathology services are provided via telehealth/telepractice and Medicaid reimbursement is sought, services must be provided by a Medicaid qualified provider.

- Master's level speech-language pathologists help a school districts' and charter schools' ability to access Medicaid funding to support the provision of a wide range of services needed to educate students with disabilities and ensure compliance with IDEA requirements.

Nevada added a second masters level speech pathology program in 2019 at Nevada State College. Within the next year, Nevada will have an additional 80 master's level clinicians from our Nevada System of Higher Education (NSHE), Nevada State College and the University of Nevada – Reno.

- Nevada school district's access to master's level speech-language pathologists is increasing.

The amendment to change licensing qualifications for speech-language pathologists to a master's degree or higher in Speech-Language Pathology will not affect licensees who hold a license in effect on the date the new regulation becomes effective, will help districts and charter schools' ability to access Medicaid funding and will not cause a loss of providers of speech and language services.

The NSHA/NV Coalition to Address Personnel Shortages supports the proposed regulation to exempt certain licensees from additional competency testing and proposed regulation to amend standards to obtain a speech language pathology education license, and kindly requests your consideration to approve the proposed amendments to NAC 391.370.

Thank you for your time.

Sincerely,
Nancy

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

Item A6, Kate Schum

Summary of Public Comment:

Kate Schum, Washoe County School District Human Resources, stated she is there to talk about the Emergency Sub Regulation. She thanked the members for bringing the regulation forward to address the need for substitute teachers that has reached crisis because of the COVID-19 pandemic. They know that the best place for a student is the classroom surrounded by caring adults. Washoe County School District has worked tirelessly to keep schools opened and have their kids in those schools. However, as they face a future, variants and spikes in the pandemic, they need to make every possible effort to allow for safe and caring individuals who want to be guest teachers the opportunity to serve their students like they can across districts in Nevada. Their Human Resources staff will continue to screen applicants to ensure they are putting the best guest teacher they can with their students. She thanked the members again for their consideration of this regulation, and they look forward to working together on any necessary changes going forward.

Item A7, Marissa McClish

Statement of Public Comment:

Hello,

Washoe County School District has been focusing on Teacher Leadership capacity building for over a decade. We have learned from our teacher leaders, our school administrators, and our department directors that effective teacher leadership involves a skill set that is different from school administration offered by traditional educational leadership preparation programs.

The effective teacher leader continuously applies their knowledge and skills in Adult Learning Theory, coaching, mentoring, facilitating professional learning, leading collaborative teams, advocating for equitable practices, and managing resistance that can come from change. They do this by working alongside their colleagues in a non-supervisory role. Teacher Leaders are continually growing to improve their abilities through professional learning and reflective practice.

Eight years ago, we implemented a Teacher Leadership Pool to ensure educators have requisite skills and knowledge needed to support teachers and administrators in a variety of educational settings and we ground the competencies of this pool to the Teacher Leadership Competencies from the National Education Association and related affiliates. WCSD recognizes that teacher leaders utilize a different set of skills and knowledge leading adults than they use when leading students; we offer a variety of professional learning offerings to support current and prospective teacher leaders gain the knowledge and skills needed to support our diverse schools.

Washoe County School District is in support of the proposed educator Endorsement as a Teacher Leader or Mentor. We do request that the professional learning required for the endorsement need not come from a university or college. As is, we are able to partner with institutions, such as Southern Utah University, to offer graduate credits for coursework. However, this is a “hoop jumping” exercise that does not change the content or delivery of coursework. NDE allows professional learning transcripts for licensure renewal to providers within the State. Allowing approved coursework for this endorsement through approved providers would promote equity in access and cost for current teachers.

Thank you,
Marissa McClish

Professional Growth Systems Project Coordinator
Washoe County School District
Department of Human Resources

Item A8, Daniela Felsenfeld

Statement of Public Comment:

Good morning,

I'm hearing from our social worker that today there is a hearing to talk about NDE Endorsement Provisions to exempt them from taking the CORE PRAXIS and other tests that are not from the social work field. However, I was told that the counselors are not included. I believe school counselors should be taken into consideration as well. I am doing my best to meet all my requirements to get my permanent school counselor license. I already passed the school counselor PRAXIS, I just finished the Family Engagement Course, but I still need to take the CORE PRAXIS. I do not think that is fair that my permanent license depends on the CORE PRAXIS. I understand that years ago this PRAXIS was not required. Why is it required now? The Math, Reading and Writing scores should not determine my future as a school counselor. I ask to please consider the school counselors for this amendment. We all have a similar background and work for the benefit of our students and their families.

Thanks!

Daniela Felsenfeld

Item A9, Dorothy Parriott

Statement of Public Comment:

I understand you will be discussing removing requirements for Audiologists, School Nurses, Social Workers, and Speech/Language Pathologists to have to take the Praxis Reading, Writing, and Math. Could you please consider removing this requirement for school psychologists as well? We are so short school psychologists that removing any unnecessary barriers would be greatly helpful. Thank you.

Dorothy Parriott, PhD
School Psychologist

Steele ES Every other Monday, Every Wednesday and Friday
702 799 2201 x4028 WAN 0357-4028

Cannon JH Every other Wednesday
702 799 5600 x4028 WAN 0537-4028

Item A10, Samuel Thompson

Statement of Public Comment:

Nevada Board of Education:

My name is Dr. Samuel Thompson and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

I am newly moved to Las Vegas with eight years of professional practice experience and a doctorate degree from a Tier 1 research university. In my professional experience I have never had to consider the PRAXIS core or its content until my employment in CCSD and being required to pass it for multiple subjects.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your continued efforts in efficiently safeguarding our students, and please don't hesitate to contact me for further comment should the Board find it useful.

Samuel Thompson, PhD
(he/him/his)

School Psychologist - CCSD Area 1 Northeast
Monday & Friday: Toland International - WAN: 0315-4028
Tuesday - Thursday: Woolley Elementary - WAN: 0364-4028

Item A11, Brendon Ross

Statement of Public Comment:

Good morning Commissioners,

My name is Brendon Ross and I am a School Psychologist in the Clark County School District. I am writing regarding the Proposed Amendments to the licensure provisions for Audiologists, School Nurses, Social Workers and Speech/Language Pathologists.

I would like to support the removal of the CORE Praxis examinations for these other licensed professional job classes. Currently, they all have to take the ETS Exams for Reading, Writing, and Math. These OLPs do not provide academic based services to our students, rather they serve some of our most vulnerable populations – students who receive special education support. Removing these provisions would decrease the financial burden on these professionals to take exams. All three exams will cost these OLPS \$180 on top of the exams that are required for their specific job classes. Those exams cost the educator an additional \$130 dollars. Therefore, I ask that the Commission pass these proposed amendments.

However, I would also like the commission to address why these proposed amendments do not include School Psychologists. I am a licensed school psychologist who is also considered an Other Licensed Professional. Currently, regulations require that I also take all three Praxis CORE Exams, as well as a Praxis for School Psychologists. This is a fiscal burden of \$310 to remove these provisions from my license. I believe that the commission should bring proposed regulations to a public workshop to remove these provisions for the School Psychologist job class as well.

Thank you for your time and consideration

Brendon Ross Ed.S NCSP

School Psychologist

Item A12, Gene Zalar

Statement of Public Comment:

School Psychologists already have the PRAXIS built into the NCSP (National Certification of School Psychologist) license. School Psychologists have built into their coursework pre-math, writing and reading exams as well as use these elementary skills at an advanced level in their daily work which includes reading advanced research, writing detailed sophisticated psychological reports and using math and statistics to determine special education decisions. To require these extra, meaningless and costly exams is simply a waste of our precious professional time and money which is already used to maintain our NCSP license with 75 SBCEU's required every three years costing a great deal of time and money. Please vote this requirement down!

Gene Zalar, NCSP

School Psychologist

Item A13, Jessica Peck

Statement of Public Comment:

Nevada Board of Education:

My name is Jessica Peck and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

In my professional experience, I have never had to consider the PRAXIS core or its content...until my employment in CCSD and being required to pass it for multiple subjects.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your continued efforts in efficiently safeguarding our students, and please don't hesitate to contact me for further comment should the Board find it useful.

Jessica Peck

School Psychologist, Ed.S., NCSP

McWilliams ES Monday/Thursday/Friday 799-4770 x4090 WAN 0414 4028

Ronzone ES Tuesday/Wednesday 799-4780 x4028 WAN 0426 4028

Item A14, Jennifer O'Dell

Statement of Public Comment:

Nevada Board of Education:

My name is Jennifer O'Dell and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those *non-educators specifically trained for assessment and programming in special populations*.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your continued efforts in efficiently safeguarding our students, and please don't hesitate to contact me for further comment should the Board find it useful.

Jennifer O'Dell, EdS, NCSP

School Psychologist

Item A15, Michael Rube

Statement of Public Comment:

Hi,

Please include school psychologists in the amendment regarding the Praxis Core. As a 14-year veteran and national certified school psychologist, the training and educational level required for entry level school psychologists GREATLY exceeds this requirement. Furthermore, as a school psychologist that has actively recruited and advocated to fill school psychologist openings in Nevada, adding an additional time consuming and expensive requirement creates yet another impediment and barrier to filling our severely depleted ranks.

Thank you for your urgent attention to this matter.

Regards,

Michael Rube, Ed.S., NCSP
School Psychologist

Clarence A. Piggott Academy of International Studies (702) 799-4450 x4028

WAN: 0466-4028

E.W. Griffith Elementary School (702) 799-4200 x4028

WAN: 0412-4028

West Career & Technical Academy (702) 799-4340 x4028

WAN: 0447-4028

Item A16, Alayna Sacca

Statement of Public Comment:

Good Afternoon,

My name is Alayna Sacca and I am a first-year school psychologist in the Clark County School District. I am writing regarding the Proposed Amendments to the licensure provisions for Audiologists, School Nurses, Social Workers and Speech/Language Pathologists.

Firstly, I would like to support the removal of the CORE Praxis examinations provision for these other licensed professional job classes. Currently, these OLPs are required to take the ETS Exams for Reading, Writing, and Math within two years of receiving their initial Nevada license. This is inappropriate, as these OLPs do not provide academic based services to our students, rather they serve students who receive special education support in various other capacities. Removing these provisions would decrease the financial burden on these professionals to take exams. All three exams will cost these OLPS \$90 each (totaling up to \$270) on top of the exams that are required for their specific job classes. Those exams cost the educator an additional \$130 dollars minimum. Therefore, I ask that the Commission pass these proposed amendments.

Secondly, however, I would also like the commission to address why these proposed amendments do not include licensed School Psychologists, in addition to the OLPs being considered. As a licensed school psychologist myself, I am considered an OLP. Current regulations require that I must take all three PRAXIS CORE Exams within two years of obtaining my initial Nevada Licensure. I graduated with an education specialist degree, from a NASP-Accredited School Psychology program at UNLV. In order to complete my graduate program, as well as obtain national certification in my profession, I was required to pass the ETS School Psychology specific PRAXIS exam. The PRAXIS CORE exams, were not and are not required to complete my graduate program, nor are they required to obtain national licensure. The PRAXIS CORE exams are only required by the Nevada Department of Education. Not only is this a HUGE hindrance to school psychologist recruitment and retention efforts, this also imposes a fiscal burden of up to an additional \$150 to \$270 (depending on taking the assessments combined or independently). Based on this information, I ask the Commission to please bring these regulations to a public workshop to discuss removing these provisions from licensed School Psychologists as well as the other OLPS addressed.

Thank you very much for your time and consideration in this matter,

Alayna Sacca

Nationally Certified School Psychologist (NCSP)

Item A17, Nicole Kelley

Statement of Public Comment:

Nevada Board of Education:

My name is Nicole Kelley. I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your continued efforts in efficiently safeguarding our students.

Nicole Kelley, Ed. S

School Psychologist

Item A18, Hannah Krantz

Statement of Public Comment:

Nevada Board of Education:

My name is Hannah Krantz and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS Core requirement is not appropriate for some school professionals, namely those non-teaching educators specifically trained for assessment and programming in special populations.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately meaningless requirement. This is my second year as a school psychologist. I have already passed the PRAXIS relevant to my field (school psychology). The PRAXIS Core is the remaining provision on my license. While School Psychologists are highly specialized assessment and reporting personnel - they are not teachers. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your continued efforts in efficiently safeguarding our students, and please don't hesitate to contact me for further comment should the Board find it useful.

Hannah Krantz, Ed.S., NCSP

School Psychologist

Item A19, Ginger Shaffer

Statement of Public Comment:

My name is Ginger Shaffer and I have worked as a School Psychologist in the Clark County School District for 14 years.

I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your consideration of this request. Please do not hesitate to contact me.

Respectfully,

Ginger Shaffer

Nationally Certified School Psychologist
edmong@nv.ccsd.net
(702) 338-6962

Item A20, Stephanie Uhl

Statement of Public Comment:

My name is Stephanie Uhl and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your continued efforts in efficiently safeguarding our students, and please don't hesitate to contact me for further comment should the Board find it useful.

Stephanie Uhl

Item A21, Tamara Filangieri

Statement of Public Comment:

Nevada Board of Education:

My name is Tamara Filangieri and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on February 24, 2022. I am informed of plans to waive this requirement for Audiologists, School Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

Please use this opportunity to add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your time and consideration.

Tamara Filangieri, NCSP

Item A22, Christina Blose

Statement of Public Comment:

Nevada Board of Education:

My name is Christina Blose and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

I am a veteran of Las Vegas with 20 years of professional practice experience and an Educational Specialist (Ed. S) degree from a Tier 1 research university. In my professional experience, I have never had to consider the PRAXIS core or its content until my employment in CCSD and being required to pass it for multiple subjects.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your continued efforts in efficiently safeguarding our students, and please don't hesitate to contact me for further comment should the Board find it useful.

Christina Blose

School Psychologist

Item A23, Sasha Bisda

Statement of Public Comment:

Nevada Board of Education:

My name is Sasha Bisda and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

Our job class is often overlooked and significant hoops like this impact our ability to recruit new school psychologists to the field. Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but irrelevant requirement to be an effective school psychologist. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your consideration, and please don't hesitate to contact me if you have any questions.

Sasha Bisda,

School Psychologist

Item A24, Camille Layseca

Statement of Public Comment:

Hello Commissioners,

My name is Camille Layseca and I am a first year school psychologist in the Clark County School District. I am writing regarding the proposed amendments to the licensure provisions for Audiologists, School Nurses, Social Workers, and Speech/Language Pathologists.

I would like to support the removal of the CORE Praxis examinations for these other licensed professional job classes. Currently, they all have to take the ETS Exams for Reading, Writing, and Math. These OLPS do not provide academic based services to our students; rather they serve some of our most vulnerable populations- students who receive special education support. Removing these provisions would decrease the financial burden on these professionals to take exams. All three exams will cost these OLPS \$180 on top of the exams that are required for their specific job classes. Those exams cost the educator an additional \$130 dollars. Therefore, I ask that the Commission pass these proposed amendments.

I am a licensed school psychologist who is also considered an Other Licensed School Professional. I have taken and passed the Praxis for School Psychologists prior to being granted licensure; however, current regulations require that I take all three Praxis CORE Exams in addition to the exam required to be a School Psychologist. This is a fiscal burden of \$310 to remove these provisions from my license; not to mention the time spent reviewing material in these respective subjects and scheduling approximately 4.5 hours of exam administration. As a first year school psychologist, I am respectfully asking that the Commissioners include School Psychologists in the proposed amendment to the licensure provisions for Audiologists, School Nurses, Social Workers, and Speech/Language Pathologists.

Thank you for your time and consideration,

Camille Layseca

School Psychologist

Item A25, Ruth Brinerhoff

Statement of Public Comment:

Nevada Board of Education:

My name is Ruth Brinkerhoff and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

I moved to Clark County School District with over twenty years' experience in Washoe County School District (Reno, NV), with a BS in elementary education, an MA in Counseling, and an Ed.S. in School Psychology. I passed the Praxis when I was newly licensed but have not had that requirement for years.

Please use this opportunity to add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel. A School Psychologist is required to attain CEU's yearly that apply to their license and keep them up to date on current policies and procedures as well as professional standards and practices.

There is an extreme shortage of school psychologists in Clark County School District as well as across the nation. This would not support the desire for students to pursue a career as a school psychologist.

Thank you for your continued efforts in efficiently safeguarding our students, and please don't hesitate to contact me for further comment should the Board find it useful.

Ruth Brinkerhoff Ed. S MFT

brinkr@nv.ccsd.net

775 772-3010

Item A26, Jasmine Mitchell

Statement of Public Comment:

Nevada Board of Education:

My name is Jasmine Mitchell and I am a School Psychologist currently practicing in the Clark County School District. I am writing to ask for your Board's consideration in adding school psychologists to the list of professionals that will be made exempt from PRAXIS competency tests in your upcoming meeting on 2/24/2022. I am informed of plans to waive this requirement for Audiologists, Nurses, Social Workers, and Speech-Language Pathologists. These proposed exemptions indicate that this Board already understands that the PRAXIS core requirement is not appropriate for some school professionals, namely those non-educators specifically trained for assessment and programming in special populations.

Please use this opportunity to correctly add School Psychologists to the list of exempted professionals from this well-intentioned but ultimately useless requirement. School Psychologists are highly specialized assessment and reporting personnel - they are not educators. A School Psychologist should no sooner be expected to pass a teacher's competency exam than that teacher should be expected to pass the School Psychologist's, or Nurse's, or Audiologist's.

Thank you for your continued efforts in efficiently safeguarding our students, and please don't hesitate to contact me for further comment should the Board find it useful.

Jasmine Mitchell Ed.S., NCSP

School Psychologist
Fertitta Middle School - Monday/Tuesday
Flex - Wednesdays
799-1900 ext. 4028, WAN 0308-4028
Fax: 799-5688
mitchjk1@nv.ccsd.net

Item A27, Tiffany McDougall

Statement of Public Comment:

To whom it may concern,

I am against changing NRS 391.019 to allow those with a high school diploma to get an emergency sub license.

1. Washoe County Substitute office is not doing there due diligence to maintain substitute teachers work list.

Proof:

2018 school year. Before my maternity leave, 5 other teachers and I went through the entire registry of substitutes A-Z provided by our administration, and 4 teachers were active. As in, everyone we called was not in the education field or already teaching. I do not know the source of where this document was obtained and does not correlate with WCSD portal.

Solution:

a. A new database must be in place to exclude liscenced teachers from the sub list to know what the county is truly working with. Charter and county schools must work together.

Proof # 2: of non due diligence

Issue with enrolled education students being finger printed up to 5 times bogging down substitute intake. All my graduating education class of 2011 was fingerprinted every year in hopes of being a sub during college, just to be fingerprinted before sub orientation.

Solution:

b. Why not promote sheriff cards as a amendment to NRS 391.019. It is sufficient for day care workers. Fingerprinting is not as available as it was in 2010.

Proof# 3: of non due diligence

Substitutes are being kicked out of the Washoe County Substitutes portal if they do not work 10 days in a school year.

Regardless of enrollment in the college of Education at UNR.

Regardless of working as a full time substitute at a charter school.

Regardless of having a bachelors degree from the college of Education from UNR.

Regardless of passing the praxis 1.

Solution:

c. Abolish said protocol. Why can't individuals be placed in a hold status. Not be able to log on to the portal, but still be able to log in to the WCSD e-mail.

This was my exact experience applying and being a substitute teacher in 2015-2016 in WCSD, and I can provide proof of dates.

Proof#4: of non due diligence

My husband received a 5 year substitute teachers license in 2010. It expired in 2015. The certificate I received was for 2 years. Thus, making me move forward with getting my full teacher licensure, because I was kicked out of my Washoe County e-mail, and portal for doing my student teaching and working charter.

Solution:

d. extend the length a substitute license is issued for. Why would the length of license be shortened when 2011 was huge teacher layoffs. My graduating class.

I would like to conclude my proof of grievances regarding WCSD Substitute Office. As the commission of standards you must not change NRS 391.019. You are rewarding the county's failures to do their job creating an existential crisis in the state of Nv regarding all teachers, substitutes or licensed professionals. I will use a sports

analogy to hopefully get you to realize the ramifications of your decision. If Major League Baseball decided to demolish Triple A ball where would they be? No one would ever be ready for the big leagues. Incoming teachers are not ready. They are so exhausted from the process that once they get in as a full fledged teacher their zest is diminishing. They are thrust into a system that does not resemble the free market and regular business hiring practices. In a typical business prospective employees submit resume, documentation of education, interview(s), and orientation. Process taking 1 day to 3 weeks.

For the substitution process it takes 3 to 9 weeks minimum. Just to get paid less then someone who serves me a burger, and then wait 30 days to get paid said little money. We are in the worst inflation in the last 40 years. No individual paying student loans can afford this 12 week lag. However, I see the Nv Board of Educations solution is to entice our seniors who graduate to apply to be a substitute just to be place holders in the classroom, because we really won't address the red tape and negligence thrust out by county offices.

Sincerely,
Tiffany McDougall

Item A28, Alisha Askin

Statement of Public Comment:

To whom this may concern,

Hello, my name is Alisha Askin, I have been with the district for 3 years, I am a licensed clinical social worker that works at Clark High School. I have always had a passion to work in a field where I am able to be of service to others. I wanted to expand my capabilities by working in a school setting that would give me hands-on experiences to work with a diversified population with varying needs. Therefore, I got the wonderful opportunity to work at Clark High School, while I am so grateful for this opportunity, I am very concerned about the provisional licensure requirements because these requirements have nothing to do with my current line of work. I have fulfilled all my requirements EXCEPT I am struggling to pass the math exam. Math is NOT my strong subject at all, actually it is my worst subject and the pressure to try to pass a math exam which has no relevance to my current position as a LCSW, has caused me great stress. I feel my worth as a social worker and what I do for students and their families should not be based on me passing examinations that have NOTHING to do with my field. I would also like to advocate on behalf of any others who might share my same concern. I love what I do at the school and I am hoping the board will come up with a fair decision that makes sense so that we can continue our employment with the district and serving our students and families. Thanks for your time in listening to my concerns.

Respectfully,

Alisha Askin, LCSW
School Social Worker
Clark High School
702-799-5800 ext. 4353
WAN 0551-4353
Google Voice Number : 702-608-4911

Item A29, Ryan Sanshuck

Statement of Public Comment:

Good day, my name is Ryan Sanshuck. I am currently a Social Worker for John Tartan Elementary School. I received my MSW in 2016 and I pass the test to be a licensed Social Worker a year or so later. I am currently licensed as a Social Worker in the State of Nevada and I have been licensed since 2017. I have worked as a Social Worker for Adult Protective Services for the State of Nevada for nearly four years before I transferred to CCSD. I have passed the necessary test to become a licensed Social Worker in Nevada. And I have a wealth of experience from my time in APS. When it comes to being an experienced Social Worker, I feel like I do not have to prove anything further. I have been to school, got my degree, passed the Social Work test, and gained valuable experience as a Social Worker. Taking an additional course and taking an additional test to become a school Social Worker seems redundant to me. I don't feel like I have to prove my worth any further to work as a school Social Worker. Taking additional tests and extra classes seems like a waste of time for me. I have taken many multicultural courses through my time in college in Grad and Undergrad. With the Social Worker field as a whole lacking Social Workers, and in addition to CCSD lacking Social Workers and other mental health professionals, it would be prudent for NV DOE to rescind this requirement. That way we can recruit and retain Social Workers who do miraculous things for our students, day in and day out. Thank you for your time.

Sincerely,

Ryan Sanshuck, MSW, LSW

Item A30, Lorenthia Clayton

Statement of Public Comment:

Good afternoon,

My name is Lorenthia Clayton and I am a Social Worker at Hyde Park Middle School. I was informed that there will be a hearing to decide on whether or not Social Workers amongst other positions within the DOE will be required to take the classes and tests to hold the licensure and would like to offer my perspective on this matter. I know personally that many people are not great at test taking which would cause many qualified people to lose their license due to a test that is not directly related to the position they hold with the district. With the pressure of having to take these classes, pass tests, along with our CEU's that we are required to acquire annually, it seems to be an unnecessary pressure placed on Social Workers. In order to assist, advocate for and help have a positive impact on our students, our mental wellbeing is important as well. The classes and tests that are required to keep the license in no way benefit our positions nor our students. It is imperative that this matter be strongly considered in all aspects as it would have a positive impact on the lives of both educators as well as the students we work with.

Best Regards,

Lorenthia Clayton LMSW
Hyde Park MS
P:702-799-4260 Ext 4144
C: 702-934-4111

Item A31, Savannah Cortner

Statement of Public Comment:

Hello and to whom it may concern,

I am a social worker for Clark County school district, holding the provisional DOE license upon completion of the Praxis. I hold a Masters in Social Work and I currently have my licensure through Nevada Association of Social Workers, as a LMSW. I would like for it to be known of my grievances with this requirement.

First and foremost, I am thankful for my employment opportunity and I thoroughly love the school that I am in. This provision was placed however with no explanation of the reason for Social Workers to complete the Praxis. I am fearful of this being possible, with the certain limitations that may apply and exist in our current state of affairs.

This views as a discrepancy with scopes of practice(s) and social workers should not be held liable for their ability to practice social work based on the inability to complete a subject-based/curriculum exam.

I hope that you may hear our plea of exempting this matter.

Thank you for all that you do.

Kindly, Savannah Cortner.

Ms. Sky (Savannah), MSW LSW
Helen J Stewart
Wraparound, Student Support Services Division
702/799-5588 X4351
WAN 0811-4351

Item A32, Alexis Hellman

Statement of Public Comment:

Greetings,

My name is Alexis Hellman, I currently work at a magnet high school and I have worked with CCSD students for 4 years. I am passionate about my work, serving my community, and inspiring youth. I currently hold a social work license issued by the Nevada Board of Examiners for Social Workers. To serve my community, I have dedicated my practice to serving children in the CCSD. In order to serve my students and community, I have obtained my masters degree in social work including completing hundreds of hours of direct practice social work experience, completing and passing a social work licensing exam, and obtaining a provisional endorsement through the Nevada Department of Education. Additionally, as a Licensed Master Social Worker (LMSW) I am required to complete 30 hours of continuing education hours every 2 years, of which 10 must be completed in my field of practice.

I teach my students that “I statements” are powerful ways to convey the way you are feeling. I feel that CCSD makes it challenging for social workers to practice school social work. I feel it is challenging because of the additional requirements of completing and passing the PRAXIS exam. With the level of education and experience I have dedicated to the students and my community; I strongly believe I am beyond qualified to serve the students in the CCSD. I spend the majority of my contract time working closely with students in regards to their social/emotional needs, along with providing them with various outside resources and basic needs. I ensure to follow-up with the students in my caseload along with their families. I continue to follow all school and state protocols and consider myself to be a team player. I find it troublesome to have to complete an additional test to work at a school, when I have paid for and taken several tests to be at the level that I am now. This is an additional test to add to my financial burden as a first year CCSD licensed employee. Furthermore, I have a documented learning disability and the pressure of another test added to my load does not help me stay at ease. I am having a difficult time understanding why this test is mandatory, as I have completed all tests required to work in the state of Nevada. Additionally, serving as a licensed social worker, I have been placed in classrooms to substitute since the CCSD is suffering a teacher and substitute shortage.

I am devoted to my students and my profession, I have a passion for my work and the ability to empower and advocate for those whose voices may not always be heard. To think about the potential of not being able to serve my community in this role brings feelings of sorrow. Our students deserve social workers who care about their wellbeing, who are passionate about them, who want to fight for them. Our students deserve social workers who are competent in their scope of practice. Not social workers whose roles are based on the ability to complete and pass a subject (Reading, Writing, and Math) based exam.

Thank you,

Alexis Hellman, LMSW

She/Her

School Social Worker

East Career & Tech Academy

Office Hours: M-F 6:50AM - 2:01PM

Serving students in: Mechanical Technology, HIM, Sports Med, Marketing, and Early Childhood.

Item A33, Habtamua Assore

Statement of Public Comment:

Good afternoon,

To whom this may concern,

My name is Habtamua Assore, a school social worker at an elementary school in Clark County School District. I have been working for CCSD as a school social worker for almost 3 year. I am a licensed master social worker and a clinical social work intern who just passed my clinical license exam and is preparing to complete my internship. I also hold a provisional license as a school social worker with the department of education. My license will not be renewed as one of the preconditions for the full endorsement is to pass the PRAXIS test. My understanding of the test is to assess the qualifications of teachers that will be conducting academic lessons in classrooms. I believe this test does not assess my skill set as a school social worker. I have taken a board exam that determined my credencial and qualifications as a social worker and clinical social worker and successfully passed on both cases. I believe these board exams are good enough to qualify me as a school social worker. I am writing this comment to ask the governing body that requires the PRAXIS test to remove it as a pre-condition for full endorsement.

Thank you and I'm looking forward to a favorable decision.

Regards,

Habtamua Assore, LMSW, CSW-I
School Social Worker
Walter E Jacobson Elementary School
8400 Boseck Dr
Las Vegas, NV 89145
702-799-4320 Ext 4351
Assorhf@nv.ccsd.net

Item A34, Elissa Couch

Summary of Public Comment:

Elissa Couch introduced herself as a school counselor from Nye County School District and stated she is speaking on Agenda Item #12 regarding NAC 391.065. Ms. Couch stated she has served on the Commission, so she understands their position and appreciates how they serve the state because it's a very difficult position to be in. She stated she is vehemently opposed to the proposal. School counselors are teachers, and in the over 20 years that she's been with Nye County School District, she has renewed her license according to NAC 391.065. This proposal completely eviscerates school counselors from this licensure renewal. Encumbering school counselors with license renewal requirements in a particular area is unequitable. School counselors are on the teacher grid, and teachers are not required to do the same. Once licensed, teachers can take any class they want without specific courses related to their license category, such as elementary, special education or subject area. She holds more than one license with the State of Nevada. What this looks like to her is they are saying that as a Special Ed K-12 teacher or a K-8 Elementary teacher, she will continue to renew her license with the minimum of 15 hours and 90 hours over the six years. However, as a school counselor, she is an exception. The first six pages of the proposal eviscerates school counselors from licensing renewal. The new NAC, beginning on page 7, only discusses the endorsement of school counselors and their continuing education. She does not see anything pertaining to licensing renewal. She asked if it meant she would need an annual endorsement of 90 hours over six years and a minimum of 15 hours to renew her other teaching licenses. She asked if she is going to have to put in 30 hours a year. She stated that she's totally opposed to this. School counselors are not "other licensed professionals," similar to school psychologists or social workers. They are educators and teachers. She does not know where this is coming from and are being removed from NAC 391.065. She is concerned about the professional development issues that will be attached to this. Rural counselors don't have the luxury of professional development in these specific areas. They're talking about a minimum of one hour in different areas to show they are getting the proper semester hours through in-service. Rurals don't get those things. School counselors are lumped in with teachers. She will have to do all the things list on pages 7 through 8 in addition to. She stated they need to step back and really look at what is going on here. She stated this is going to be financially burdensome for school counselors and ultimately, their students suffer. They're in a very difficult situation. They have the training, and they develop their programs, but they are in Tier 3 all day long since their situation. She is now going to have to make sure she finds professional development in these particular areas that they don't have access to.

Ms. Couch stated she hopes the Commission considers all of these things she has brought up. She thinks this will put a lot of school counselors at risk for losing their license, and they need to take a step back and get more input. She thinks the things they are asking them to do are things any counselor would do and they are doing. However, when it comes to re-licensure and trying to find professional development for these specific areas, are not available to them and will be financially burdensome.

Ms. Couch thanked the Commission for allowing her to give her input. She's been teaching in Nevada for almost 40 years and now this is going to change everything.

Item A35, Peter Wiens

Summary of Public Comment:

Peter Wiens introduced himself as a Professor at University of Nevada, Las Vegas, and he coordinates their teacher leadership graduate programs. He stated he wanted to speak in favor of the endorsement as educational mentor related to NAC 391.XXX. Mr. Wiens stated it is crystal clear that building capacity in teachers as leaders, instructionally as mentors, benefits students and schools as organizations, and he thinks it's a good idea that the state is creating an endorsement to recognize people that take the initiative to build these skills.