

**NEVADA DEPARTMENT OF EDUCATION
COMMISSION ON PROFESSIONAL STANDARDS IN EDUCATION
MAY 18, 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>

COMMISSION MEMBERS PRESENT:

In Las Vegas:

Commissioner Kenny Belknap
Commissioner Jordan Wenger
Commissioner Maria Roberts
Commissioner Aaron West-Guillen

In Carson City:

Commissioner Jamie Hawkins
Commissioner Richard Stokes

Virtually:

Commissioner Sherry Mitchell

COMMISSION MEMBERS NOT PRESENT:

Commissioner Christina Tucker
Commissioner Jennifer Davis

DEPARTMENT STAFF PRESENT:

In Las Vegas:

Anabel Sanchez, Education Programs Professional, Office of Educator Development, Licensure, and Family Engagement
Ronika Johnson, AA III, Office of Educator Development, Licensure, and Family Engagement.
Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement.

In Carson City:

None

Virtually:

None

LEGAL STAFF PRESENT

Deputy Attorney General David Gardner (Virtually)

AUDIENCE IN ATTENDANCE:

None

In Las Vegas:

None

Carson City:

Kim Redding, NAHA, Nevada Speech Language Hearing Association.

Dr. Angel Bell, State of Nevada College, Ph.D. CCC/SLP.

Dr. Keri Altig, Clark County School District.

Dr. Katie Dockweiler, Nevada State College.

Keeli Killian, Washoe County School District.

Katie Schum, Washoe County School District.

Wendy Bailes, NAHA, Nevada Speech Language Hearing Association.

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

President West called the meeting to order at 9:00 a.m. Roll call attendance was taken as reflected above and quorum was established. The Pledge of Allegiance was led by Commissioner Roberts.

2. PUBLIC COMMENT #1

1. Dara K. Winn, Chief Education Officer for Public Education Foundation, provided public comment regarding (Item#8) NAC 391.036. *(A summary of the statement is available in Appendix A)*
2. Lauren Gorman, Clark County School District, provided public comment regarding (Item #8) NAC 391.036. *(A summary of this statement is available in Appendix A)*
3. Chris Popek, Founder and Strategic Advisor, iteach Nevada, provided public comment regarding (Item# 8) NAC 391.036. *(A summary of this statement is available in Appendix A)*
4. Judy Rich, Clark County School District, provided public comment regarding (Item# NAC 391.036. *(A summary of this statement is available in Appendix A)*
5. Maria Jennings, Clark County School District, provided public comment regarding NAC 391.370. *(A summary of the statement is available in Appendix A).*
6. Karen Klopfer, Clark County School District, provided public comment regarding NAC 391.370. *(A summary of this statement is available in Appendix A)*
7. Laura Simeone, Clark County School District, provided public comment regarding NAC 391.370. *(A summary of this statement is available in Appendix A)*
8. Christine Forti, Clark County School District, provided public comment regarding NAC 391.360 *(A summary of this statement is available in Appendix A)*
9. Dr. Heather Gaylord, Clark County School District, provided public comment regarding NAC 391.370 *(A summary of this statement is available in Appendix A)*
10. Katherine Fowler, Clark County School District, provided public comment regarding NAC 391.370. *(A summary of this statement is available in Appendix A)*
11. Laura Laidler, Clark County School District, provided public comment regarding NAC 391.370 *(A summary of this statement is available in Appendix A)*
12. Kristen Neville, State Affairs AOTA, provided public comment regarding NAC 391.XXX *(A summary of this statement is available in Appendix A)*
13. Gina Elgaard, Clark County School District, provided public comment regarding NAC 391.370. XXX *(A summary of this statement is available in Appendix A)*

14. Nancy Kuhles, NSHA/NV Coalition Co-Chair, provided public comment regarding NAC 391.370 (*A summary of this statement is available in Appendix A*)

3. APPROVAL OF APRIL 20, 2022, MINUTES

Motion: Commissioner Jordan Wenger moved to approve the March 16, 2022, meeting minutes. Commissioner Kenny Belknap seconded the motion. **Motion carried unanimously.**

4. PRESIDENT'S REPORT

President West reminded the commission there is a deadline of June 30 to submit language to the Legislative Counsel Bureau. The next proposed meeting date is June 22, 2022, there will not be a meeting in July.

5. SECRETARY'S REPORT

Jeff Briske, Director, Office of Educator Development, Licensure and Family Engagement, Director Briske reviewed topics from the April meeting and announce new topics for the May and June meetings. He reported that a public workshop was held for speech language pathologist. [NAC 391.370 Speech Language Pathology](#). After some additional engagement with stakeholders, there are some additional considerations before the commission, the department hopes to capture input from the commissioners on the stakeholder suggestions. In June there will be a public workshop.

6. STUDENT TEACHER RESIDENT LICENSE (*Information/Discussion*) THE COMMISSION WILL HEAR SUGGESTED CHANGES TO NAC 391.XXX.

Director Briske announced the Department wishes to create a student-teacher resident license as an alternative to a sub-license for student teachers. The program would be yearlong and provide a career ladder for preservice teachers. Applicants can remain employed. They will be supervised by both the cooperating teacher and the teacher preparation program faculty. Exemptions will be made, and licensing fees reduced. Additional teaching endorsements would not be allowed. The nonrenewable license would be valid for one year after which the conditions in the license would be invalid.

Commissioner Belknap stated it is an important step that this commission can help create more of a pipeline to make this license more attractive to get into the teaching profession. The lingering question is regarding the \$100.00 fee to obtain this license, Belknap questioned if any additional endorsements can be added? Can this mean a student would have to reapply for \$180.00 to get their full teaching licenses?

Director Briske responded, yes, that is correct, it's like any other conversion to a standard license.

Commissioner Belknap asked if an applicant has been fingerprinted, do the districts background check them before the applicant comes in?

Director Briske responded, yes, recently we polled all 17 districts, two major districts do fingerprinting as an employment background check. Some districts do hire teachers pending their own background check based on our background check. Some of the rural districts do not do a separate background check, they rely on our background check.

Commissioner Stokes reported there are often few substitute teachers to go around and while there is sometimes an assignment for the student teachers to work in a particular subject area. Under this proposal, would those student teachers be able to continue substitute teaching?

Director Briske responded in the affirmation, and explained that, the representatives from Great Basin College spoke about this regulation, their concern was that many of their students go in and immediately are substitute teachers and do not have the full student teaching experience. He reminded commissioners that they could revise the regulation to align with the intent of allowing them to substitute teach.

Commissioner Wenger reported her concern has to do with the student teacher resident licenses being valid for one year and a student teacher course is only for one semester. Maybe this could be changed for student teaching for that first semester that they have this license. Proposing those rural districts can tap into them as a substitute for that remaining time.

Director Briske announced there is a new vision called Nevada Forward and this is expanding to give preparation institutions an option to expand their student teaching for a full year. While they complete their coursework and earn credit from the actual work experience in class and get instruction from not only their cooperating teacher, but also their field supervisor and the course work.

President West reported this is for discussion purposes. There will be no action taken on this based on the input that's been provided. He stated Mr. Briske can bring this forward for a workshop very soon.

Commissioner Wenger mentioned she wouldn't want that to apply to all of Nevada, due to it being misused in those larger districts with more vacancies. The districts should not have access to be able to use them as subs which needs a population cap.

Director Briske reported the workshop would be held in June, and the commission could continue to make modifications as the Department would have plenty of time to make changes.

Commissioner Roberts mentioned the possibility of allowing the supervising teacher to give input into whether they're ready to be substitute teachers.

7. SPEECH LANGUAGE PATHOLOGY QUALIFICATIONS (*Information/Discussion*) THE COMMISSION WILL HEAR SUGGESTED CHANGES TO NAC 391.370.

Director Briske announced the workshop was very successful in February of this year, and the Commission moved it to a public hearing. As the commission engages with stakeholders and incorporates suggestions from the commissioners, additional language changes are necessary for a regulation. [Page 1 of the regulation](#) shows the first version will not be effective until September 2027 instead of 2025, to allow students at Nevada State College time to graduate as they have already enrolled and paid tuition. Director Briske referred to page 3 of the regulation and noted the effective date for this version has been changed to October 2027 instead of 2025. Any additional language in section 3 explains the expectations of licensure renewal and section 4 has been added to allow those already licensed to continue to renew their license.

Dr. Angel Ball demonstrated a revision to the proposed date of 2027. Per the request from Nevada State College (NSC), they are concerned about how the college can make the transition. A discussion and request from the speech pathologists that are currently working at Clark County School District (CCSD), fully support everything that has been mentioned in the public comment. Most Speech-Language Pathologists (SLPs) who wrote in the arguments, are in full support to move the master's program. As a compromise, the 2027 date can be a long wait for CCSD for their interests and purposes. This can be compromised for 2026 in NAC 391.370. Nevada State College has processes and procedures that take longer, NSC has a bachelor's degree program that is housed in the School of Education on campus. The program indicates it is a pre-professional program designed to prepare students for advanced studies and speech-language pathology. At the master's level, this is needed to obtain the necessary licensure to work within the school system in the State of Nevada. The Southern Nevada program has trained in three areas in assessment and treatment. CCSD comes in after the student's final term to provide an external practicum training. This program started with undergrad students in 2006. Over the past 10 years, 101 students graduated and were prepared to work in the schools with an undergrad. From 2017 to 2021 another 100 graduated. Of those graduates, at least 200 have been able to work in the schools. **(Dr. Angel Bell presented a [presentation](#) regarding NAC 391.370.)**

Dr. Angel Bell suggested the proposed effective date of 2026 for NAC 391.370 be considered. The system of higher education can push a catalog change that will remove the training piece except the 25 hours of observation and the undergrad practicum.

Commissioner Stokes asked, if similar programs were available at the University of Nevada Las Vegas (UNLV) or elsewhere in Nevada?

Dr. Angel Bell responded with the University of Nevada Reno (UNR) is not training the student for the undergrad practicum and direction.

Kim Redding responded that students are prepared at UNR for a bachelor's and master's degree. However, UNR's program is focused on getting the master's degree to move into the professional settings.

Commissioner Wenger stated that she wasn't aware that UNR would continue to allow the bachelor's level practice.

8. SCHOOL PSYCHOLOGY INTERN AND SCHOOL PSYCHOLOGY ASSISTANT LICENSES(*Information/Discussion*) THE COMMISSION WILL HEAR SUGGESTED CHANGES TO NAC 391.XXX

Director Briske mentioned that Nevada State College and Clark County School District brought forward suggested language that would improve the current psychology intern license and create a psychology assistant license. Typically, anytime a regulation is changed for teachers, those teachers continue teaching and renewing their license without burdens. If a license has expired or lapsed, the teacher would have to meet the new requirements to apply for a license. If the teacher renews, then they do not meet the new requirements. New language describes the requirements to obtain a license and who is responsible for the supervision of the intern. Section 6 removes some older language requirements and changes the length of the license from 2 to 3 years bringing this license in line with all other provisional licenses.

Commissioner Wenger stated she is in full support of changing the date of NAC 391.370 to year 2026. She prefers it to be 2025, yet she is in full understanding of the 2026 compromise.

Dr. Katie Dockweiler mentioned Nevada State College is creating career pathways into three professions to grow multiple entry and exit points to support recruitment, training, and retention efforts. The proposed regulations would be specific to school psychology and the legislation regarding ratios and shortage of school based mental health providers, specifically Senate Bills 89 and 319 from 2019 and Senate Bills 151 and 352 from 2021. This position formalizes its role in a school setting and helps solidify its place in the school psychology pipeline. The older regulation to license will support recruitment and retention efforts then recruits will be inclined to complete their internship.

Dr. Keri Altig announced that currently the Clark County School District is continuing to force fit them into a sub license to obtain background checks and stipends. Which has no benefits attached to this revenue. Allowing the school psychologist interns to practice as a school psychologist with supervision that is required by the National Association of School Psychology.

Commissioner Wenger, President West made comments regarding NAC 391.370

9. PROVISIONAL ALTERNATIVE ROUTE TO LICENSURE QUALIFICATIONS (*Information/Discussion*) THE COMMISSION WILL HEAR SUGGESTED CHANGES TO NAC 391.057

Director Briske suggested revising [NAC 391.057](#) to remove the exam requirements from initial licensure, but not removing these requirements for a standard license. Traditional pathway students will not have to pass the competency exams to earn an initial license. For the alternative pathway candidates, we are moving the exam requirement from the start of the license process to the end, to align the process with the traditional pathway, thus removing barriers for licensure and increasing the diversity in the workforce.

Commissioner Belknap questioned if a student is attending UNLV and received a bachelor's degree, then was hired with the provisions on the licenses to take the Praxis in the next three years, is that correct?

Director Briske stated that Commissioner Belknap was correct.

Commissioner Stokes questioned what impact will the Alternative Route to Licensure (ARL) process have on the current workforce? Would the department have solutions on getting more teachers to the traditional route? What are the impacts on ARL conditions in the State of Nevada?

Director Briske mentioned there are several different ARL programs including that of the Clark County School District and several other programs which are nontraditional. All ARL programs will significantly increase their pipeline. This would allow a much more diverse workforce, teachers trained in classrooms, and still have the requirement at the end of the program.

Commissioner Hawkins Asked about the timeline to pass the required test.

Director Briske stated, the students would have to pass the Praxis test before they can convert to a standard license.

Commissioner Wenger asked about when the regulation would go into effect.

Director Briske stated that it would need to be scheduled for public workshop in June.

10. MIDDLE SCHOOL AND SECONDARY EDUCATION LICENSES (*Informed/Discussion*)

Director Briske mentioned the intent of updating these regulations were to allow a pathway for educators holding a lower grade level license, to obtain an endorsement in an upper grade level by passing a subject area exam.

Commissioner Belknap asked if it would affect any current educator that has the endorsement on their license.

Director Briske stated it would not affect current licenses.

11. COMPREHENSIVE MAJORS AND MINORS RECOGNIZED BY THE COMMISSION (*Informed/Discussion*)

Director Briske stated [NAC 391.1301](#) was discovered to include Recreational Physical Education which ~~is~~ language is in the Business & Industry/Career and Technical Education (CTE) regulation. No Commissioners commented regarding this item.

9:05 AM

12. 9:10 A.M. WORKSHOP TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.180- ENDORSEMENT AS A SCHOOL COUNSELOR; NAC CHAPTER 391.315- ENDORSEMENT TO SERVE AS A SCHOOL PSYCHOLOGIST: GENERAL QUALIFICATIONS; RENEWAL. (*Information/Discussion/For possible action*)

Director Briske stated a Public Workshop for amendments affecting [NAC 391.180 and 391.315](#) regarding licensure renewal requirements for a person who is serving as a school counselor or school psychologist which pertains to Senate Bill 151 (2021) and exam requirements for these licenses.

Commissioner Wenger referenced public comment made by Keeli Killian at the previous meeting regarding the National Board of Certified Counselors recommendation to use language called specialty certification. Which the (ASCA) American School Counselors Association aligns directly with the (NEPF) Nevada Educator Performance Framework.

Director Briske mentioned another alternative would be to call out “b. holds a certificate or renewal as a national certified school counselor issued by the National Board for Certified Counselors.” and then add the (ASCA) American School Counselor Association certificates certification.

President West mentioned the amended language to keep open as possible.

President West stated this is a workshop and a motion is needed for this regulation to move forward to public hearing with a proposed change to four, subsection B adding other applicable governing bodies.

13. 9:05 A.M. WORKSHOP TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.277- ENDORSEMENT TO TEACH OCCUPATIONAL THERAPY; AND NAC 391.279 – ENDORSEMENT TO TEACH PHYSICAL THERAPY. (*Informed/Discussion/For possible action*)

Director Briske mentioned a public workshop for amendments affecting NAC 391.277 occupational therapist, NAC 391.279 physical therapist, and NAC 391.xxx occupational and physical therapy assistants. This regulation clarifies that occupational and physical therapists provide services to students, exempts these license holders from exams and renewal requirements, and proposes an assistant license.

Kristen Neville stated on behalf of the American Occupational Therapy Association (AOTA), I write to provide brief comments on the proposed changes to NAC 391.277. AOTA supports the proposed changes and thanks the Commission on Professional Standards (COPS) for working with us to amend the regulation to eliminate the requirement that occupational therapists, obtain the AOTA specialty certification, and to add a regulation to allow occupational therapy assistants (OTAs) to obtain the endorsement.

President West asked about renewal requirements.

Director Briske mentioned that providers do not instruct students in math, reading, and English. For that reason, the renewal requirements were taken out as well as the request to be in line with other licensed educational professionals.

14. FUTURE AGENDA ITEMS (*Informed/Discussion*)

Director Briske stated that future agenda items would include public workshops for items 6, 7, 8, 9, 10, and 11 from the meeting; an update from Educational Testing Service regarding multi-state test reviews; Competency testing discussions; and continued discussion of the Emergency Substitute and Regular Substitute regulations.

15. PUBLIC COMMENT #2

The was no public comment. (Email comment)

16. ADJOURNMENT

Commissioner Belknap moved to adjourn the meeting. Commissioner Roberts seconded.
Motion carried unanimously. The meeting adjourned at 11:15am

APPENDIX A: STATEMENTS GIVEN DURING PUBLIC COMMENT

1. Dara K. Winn, Chief Education Officer for Public Education Foundation, provided public comment regarding (Item#8) NAC 391.036. *(A summary of the statement is available in Appendix A)*
2. Lauren Gorman, Clark County School District, provided public comment regarding NAC 391.370. *(A summary of this statement is available in Appendix A)*
3. Chris Popek, Founder and Strategic Advisor, iteach Nevada, provided public comment regarding NAC 391.057. *(A summary of this statement is available in Appendix A)*
4. Judy Rich, Clark County School District, provided public comment regarding (Item# NAC 391.370. *(A summary of this statement is available in Appendix A)*
5. Maria Jennings, Coordinator IV for Clark County School District, provided public comment regarding NAC 391.370. And NAC 391.315. *(A summary of the statement is available in Appendix A).*
6. Karen Klopfer, Clark County School District, provided public comment regarding NAC 391.370. *(A summary of this statement is available in Appendix A)*
7. Laura Simeone, Clark County School District, provided public comment regarding NAC 391.370. *(A summary of this statement is available in Appendix A)*
8. Christine Forti, Clark County School District, provided public comment regarding NAC 391.360 *(A summary of this statement is available in Appendix A)*
9. Dr. Heather Gaylord, Clark County School District, provided public comment regarding NAC 391.370 *(A summary of this statement is available in Appendix A)*
10. Katherine Fowler, Clark County School District, provided public comment regarding NAC 391.370. *(A summary of this statement is available in Appendix A)*
11. Laura Laidler, Clark County School District, provided public comment regarding NAC 391.370 *(A summary of this statement is available in Appendix A)*
12. Kristen Neville, State Affairs AOTA, provided public comment regarding NAC 391.370 *(A summary of this statement is available in Appendix A)*
13. Gina Elgaard, Clark County School District, provided public comment regarding NAC 391.370. *370 (A summary of this statement is available in Appendix A)*
14. Nancy Kuhles, NSHA/NV Coalition Co-Chair, provided public comment regarding NAC 391.370 *(A summary of this statement is available in Appendix A)*

ITEM A1: DARA K WINN

Summary of Public Comment:

Provided Public comment regarding NAC 391.036.

Dear Members of the Commission on Professional Standards in Education,

My name is Dara Winn and I am writing to comment on the pending change to NAC 391.370 regarding the elevation of the license requirements for educational SLPs.

I am a Speech Language Pathologist who has practiced in Nevada since 2003. I knew when I chose my undergraduate major that I would be committing to the completion of at least a master's degree in Speech-Language Pathology in order to be able to practice. I received my master's degree at the City University of New York-Brooklyn College and practiced in both New York and Northern Virginia from 1992 until moving to Nevada. Upon my arrival and application for a school-based position I was shocked to learn that there were people with bachelor's degrees not only practicing but using the title "Speech-Language Pathologist". Based on the training that I received and my membership in ASHA I was beyond dismayed as this seemed an ethical misrepresentation of title.

In my current position as a Speech Language Therapy Services Coordinator in Clark County School District, I carry the distinct responsibility of facilitating the services, data and documentation that is submitted for School-Based Medicaid Reimbursement. This project requires careful alignment of IDEA practices, school district job descriptions and contracts, and adherence to the Nevada Medicaid Services Manual Chapter 2800. (MSM 2800)

The Bachelor's level educational SLP practitioner does not meet the standard of a Medicaid school services provider. In School Medicaid, these bachelor's level SLPs practice "Under the Direction Of" (UTDO) a qualified provider in accordance with the MSM 2800 and the American Speech Language Hearing Association (ASHA) School-Based Medicaid guidance. In fact, in CCSD, we refer to this class of providers as "UTDO's", since ASHA Code of Ethics forbids using the title for anyone other than a CCC-SLP or a person in their clinical fellowship year, a CF.

(Principal of Ethics ID: Individuals shall not misrepresent the credentials of aides, assistants, technicians, support personnel, students, research interns, Clinical Fellows, or any others under their supervision, and they shall inform those they serve professionally of the name, role, and professional credentials of persons providing services)

Currently CCSD employs 215 UTDO practitioners who provide speech-language services throughout the valley. Providing the minimum UTDO supervision required by ASHA this is the equivalent of 463 work hours per week. This requires 13 full time SLP positions of the highest performing, most experienced staff being dedicated to under licensed staff supervision. This is not sustainable.

While CCSD is grateful for the pool of bachelor's level applicants that have supported us during our critical staffing shortages, CCSD SLT department is committed to prioritizing the hiring of Master's level clinicians, and I fully support the sunset of the Bachelor's level licensure in 2025.

Dara K Winn, MS CCC-SLP Speech-Language Pathologist, Coordinator IV, Speech-Language Therapy Services Department Area Service Center at Brinley #102, winndk@nv.ccsd.net

ITEMA2: LAURA GORMAN KING

Summary of Public Comment:

Provided public comment regarding NAC 391.036

My name is Lauren Gorman King, and I am a Speech-Language Pathologist working in a special school setting and am writing in response to the proposed changes to NAC 391.370.

I am a master's level speech pathologist and have been in various settings for 15 years. I strongly oppose the option of delaying the sunseting to 2027.

Nevada is the only state in the US that will allow bachelor level speech language pathologists to service kids in the school setting, and this is showing to do much dis-service to our school age population. In any other setting it is mandated that Speech-Language Pathologists have their master's degree and also obtain their ASHA Certificate of Clinical Competence in order to service children in these other settings. Having it be mandated that all Speech-Language pathologists will be held to a higher standard of educational training and experience will not only improve the quality and efficacy of the individuals providing the service but will also allow the department to receive additional funding in the form of Medicaid reimbursement.

I also believe that having more educational training and experience will provide a better degree of researched based practices to ensure that the services being provided to our children are in fact being implemented with fidelity since the populations being serviced vary in degree of severity and in need of practice ranging from developing functional/age appropriate receptive/expressive communication skills, safely swallow and/or modify the environment and help prepare them to be effective members of the community in the future.

Continuing to hold lower standards when it comes to education and training for our SLPs in this state to practice can lead to exacerbations of current illnesses, problems with treatment and progress as well as other physical/medical injuries specifically when it comes to pediatric feeding.

Not delaying the sunseting any longer would in fact align with the NV Department of Education mission statement which reads "to improve educator effectiveness and promote excellence in student achievement and educator effectiveness."

Thank you so much for your time and consideration in this very important matter.

Regards, Lauren Gorman King M.S CCC-SLP

ITEM A3: CHRIS POPEK

Summary of Public Comment:

To whom it may concern,

I am writing in regard to Regulation 395017. On May 18, the State Commission on Professional Standards is having a meeting discussion on Regulation 395017 - which states that ARL candidates must pass Praxis exams before getting their license. I am hoping that it is decided to be more flexible in the case that candidates are not able to pass before the first day of school, that they would still be able to start as a full-time teacher (salary & benefits included) with passing Praxis exams added as a provision on their license.

As a principal in CCSD that has teachers who attained licensure through the ARL process, I am hoping for this flexibility that is ultimately best for our students.

Chris Popek

Principal, Cambeiro ES

ESY Principal, Cambeiro ES

ITEM A4: JUDY RICH

Summary of Public Comment:

Provided Public comment regarding NAC 391.XXX

Dear President West-Guillen:

On behalf of the American Speech-Language-Hearing Association, I write in support of the proposed changes in educational requirements to a master's degree in speech-language pathology for those providing services in school settings.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, and swallowing disorders. Over 1,000 ASHA members reside in Nevada.ⁱ

Nevada can ensure that SLPs have received the appropriate training and education to assess and treat speech, language, swallowing, and cognitive communication disorders in children by requiring a master's in speech-language pathology. Services provided by an appropriately trained SLP help children acquire speech-language skills, and enable individuals to recover essential skills to communicate, safely swallow, or maintain sufficient attention, memory, and organizational skills to function in their environment.

Nevada is the only state in the country allowing SLPs with a bachelor's degree to service children in school settings. SLPs require a higher level of training due to their scope of practice which includes prevention, assessment, and habilitation/rehabilitation of communication, and treating swallowing disordersⁱⁱ Nevada currently has two master's level programs which would provide the additional education needed to ensure the safety of Nevada's children. Outside of the school setting, SLPs are required to hold a master's degree and are licensed by the Nevada Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board.

Thank you for your consideration of ASHA's position to support the proposed increased educational standards for SLPs. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,

A handwritten signature in cursive script that reads "Judy Rich".

ITEM A5: MARA JENNINGS

Summary of Public Comment:

Provided Public comment regarding NAC 391.036

My name is Maria Jennings, and I am a Speech-Language Pathologist (SLP) working in Clark County School District. I am writing to support the proposed changes to NAC 391.370 I am writing in support of the sunset of the bachelor's degree allowance for the Department of Education Teacher of Speech-Language Impaired license. I support requiring a master's degree in Communication Sciences/Speech Pathology for all incoming educational SLPs, with implementation as soon as possible.

Nevada is currently the only remaining state in the country allowing speech-language pathologists (SLPs) with bachelor's degrees to service children in school settings. Nevada currently has two master's level programs to provide the higher-level degree which is needed to ensure the safety of Nevada's children, making now an appropriate time to make the proposed changes.

As an SLP who does hold a master's degree and Certificate of Clinical Competence, my roles and responsibilities in schools are well defined by ASHA (American Speech Language Hearing Association) as well as the Nevada Speech Language Pathology, Audiology, and Hearing Aid Dispensing Board. Those possessing bachelor's level degrees have significantly less specialized training than those with their Certificate of Clinical Competency (CCC), yet, in the educational setting, they carry the same title, the same job description, and are on the same salary scale. Consequently, the continuation of the bachelor's level school-based SLP creates a lack of equity in job duties, more responsibility for the CCC-SLP colleague, and ultimately impacts the quality of services delivered to Nevada's students.

When I began my career, I was hired by the Clark County School District as an SLP holding an educational license (Bachelor's degree). After working for a few years, I felt that I was not providing the highest level of service, that I was unprepared to make appropriate clinical decisions and that I needed further education in order to fulfill both of these things. I decided to pursue a master's degree. After one semester in graduate school, I remember thinking, and verbalizing to my supervisor, "How did you let me do this job when I had no clue how to do this job?". Essentially, holding a bachelor's degree in speech-language pathology is preparatory knowledge. It gives the possessor the ability to, perhaps, provide therapy with supervision, but certainly does not provide the essential knowledge and skills required to make clinical judgements, conduct assessments, synthesize information from those evaluations, and determine, or prescribe, treatment necessities. By setting the higher degree standard of a master's in speech-language pathology, you are ensuring that SLPs have received the appropriate training and education to assess and treat speech, language, swallowing, balance, and cognitive communication disorders in both children and adults. It is time for Nevada to uphold these standards to the highest degree by making the proposed changes to the NAC.

Sincerely,

Maria Jennings, MS, CCC-SLP

ITEM A6: KAREN KLOPFER

Summary of Public Comment:

Provided Public comment regarding NAC 391.0896

Dear Members of the Commission on Professional Standards in Education:

My name is Karen Klopfer, and I am a Speech-Language Pathologist (SLP) holding the Certificate of Clinical Competence (CCC), and I am writing in support of the pending change to NAC 391.370 regarding elevating the license requirement for educational SLPs to a master's degree, effective 2025.

I am a Nevada State Educational Advocacy Liaison (SEAL) for the American Speech Language Hearing Association (ASHA) and I work in Clark County School District (CCSD) as a Speech-Language Therapy Services Department Coordinator. However, today I write from the personal perspective as a longtime Nevada resident, and an SLP in Nevada for more than 30 years.

38 years ago, I graduated high school from CCSD, and with an interest in Communication Disorders, applied to the University of Nevada-Reno. I obtained my bachelor's degree in 1987; during my final undergraduate year, I was told by my advisors and professors, in no uncertain terms, that one must have a master's degree to be fully proficient in the field of Speech Language Pathology. As a first-generation college graduate, I had not anticipated the need for a master's degree, but adjusted my course, and completed my postgraduate degree in 1989. I returned to work in Las Vegas in 1990, and for the last 32 years, have worked in every possible pediatric setting. In all of these settings for more than three decades, the conversation over Nevada's lesser educational SLP license was always a topic of controversy, and often ridicule.

Despite the criticism of my colleagues who claimed I was accepting a 'watered down' version of our job, I began working for CCSD in 2003. From the moment I began working in the schools, I realized that my job is not 'watered down', and that I relied daily on the depth of knowledge that I obtained in my post-graduate training in order to sufficiently prepare and implement effective diagnostic and treatment plans for the students I serve. In 2011, I joined CCSD's administrative team, and can affirm that from the supervisory viewpoint, while the bachelor's level educational SLP is a competent technician for job tasks, even with extensive self-study beyond their initial program, these educators need additional guidance, oversight and support to provide comprehensive services with the depth and analysis expected of the title SLP. This guidance and oversight is a support that their Master's level peers simply don't need.

Scope of practice of Speech Language Pathology in schools encompasses any and all speech language pathology practices as they occur within the educational setting. It is not a lesser role or responsibility than a clinical or medical SLP position. Bachelor's level SLPs do not have the core knowledge and depth of understanding to address all components of school-based scope of practice, and are not recognized by Nevada Medicaid as a qualified provider. Continuing the licensing and hiring of the bachelor's level educational SLPs produces costly support needs in our already struggling schools, creates ethical conflicts for fully trained peers who must override their contractual equals' judgments, and generates an unwelcome but unavoidable class system in our department. Master's level CCC-SLPs must carry the responsibilities of fulfilling the duties that their bachelor's level peers cannot complete.

These Master's level SLPs are also offered opportunities and incentives that their bachelor's level peers cannot access, creating contractual challenges. This circumstance is not sustainable and becomes a barrier to retention and recruitment of master's level SLPs, who have many job options beyond the schools.

Nevada schools must match the national standard. Nevada SLPs deserves proper representation of their earned professional title. Nevada students deserve a prepared and fully trained Speech-Language Pathologist. Stakeholders must all carry the responsibility of elevating Nevada's standards, regardless of discomforts involved. For 33 years that I have witnessed, this lesser license matter has been a 'known issue', a hot topic in Nevada. Further delay on elevating the requirement for educational SLPs would be irresponsible.

I firmly support the draft language change that ends the bachelor's level license allowance in 2025.

Thank you for your consideration,

Karen Klopfer, MS, CCC-SLP
Speech-Language Pathologist

ITEM A7: LAURA SAMONE

Summary of Public Comment:

Provided Public comment regarding NAC 391.0896

My name is Laura Simeone and I am a Speech-Language Pathologist (SLP) working in Clark County School District. I am writing to support the proposed changes to NAC 391.370, particularly the sunset of the bachelor's degree allowance for the Department of Education Teacher of Speech-Language Impaired license. As an SLP holding a master's degree and Certificate of Clinical Competence for over 20 years, my roles and responsibilities in schools are well defined by the American Speech-Language-Hearing Association (ASHA) and the Nevada Speech-Language Pathology, Audiology, and Hearing Aid Dispensing Board. I abide by the ASHA Code of Ethics and independently provide all services defined in the Nevada Medicaid School Health Services guide. My Bachelor's level peers who have significantly less specialized training than I do carry the same title, the same job description, and are on the same salary scale as me, yet are not required to meet these same standards and accountability, nor can they act as an independent qualified service provider for School-Based Medicaid.

I am originally from New York, and I was a licensed Speech-Language Pathologist in that state. When I moved to the state of Nevada, I was stunned to learn bachelor's level SLPs were allowed to work independently and even more concerned that they were allowed to operate under the title of Speech-Language Pathologist.

The continuation of the bachelor's level school-based SLP creates inequity in job duties, more responsibility for the CCC-SLP colleague, and ultimately impacts the quality of services delivered to Nevada's students. I am in support of requiring a master's degree in Communication Sciences/Speech Pathology for all incoming educational SLPs, effective as soon as can be implemented. I also feel these changes will also attract more licensed and qualified SLPs to the school district as they will see that their hard work and training in order to earn their masters' degree and CCCs will be recognized and held in high regard.

Thank you,

Laura Simeone M.A., CCC-SLP

ASHA Certified and Nevada Licensed

Speech-Language Pathologist

ITEM A8: CHRISTINA FORTI

Summary of Public Comment:

Provided Public comment regarding NAC 391.360

Hello,

My name is Christine Forti and I am a Speech-Language Pathologist working in CCSD and am writing to support the changes to NAC 394.360 requiring a master's degree for educational licensure in Speech Language Pathology. Nevada is currently the **only** remaining state in the country allowing speech-language pathologists (SLPs) with bachelor's degrees to service children in school settings. Outside of this setting, SLPs are licensed by the Nevada Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board. Nevada currently has two master's level programs to provide the higher-level degree which is needed to ensure the safety of Nevada's children. Those with the appropriate master's level degree also enables an SLP to obtain their ASHA Certificate of Clinical Competence from ASHA and then bill Medicaid bringing in additional funds and services to schools and to those most in need.

By setting the higher degree standard of a master's in speech-language pathology, you are ensuring that SLPs have received the appropriate training and education to assess and treat speech, language, swallowing, balance, and cognitive communication disorders in both children and adults.

As an SLP holding a master's degree and Certificate of Clinical Competence, my roles and responsibilities in schools are well defined by the American Speech Language Hearing Association (ASHA) and the Nevada Speech Language Pathology, Audiology, and Hearing Aid Dispensing Board. I abide by the ASHA Code of Ethics and independently provide all services defined in the Nevada Medicaid School Health Services guide. My Bachelor's level peers who have significantly less specialized training than I do carry the same title, the same job description, and are on the same salary scale as me, yet are not required to meet these same standards and accountability, nor can they act as an independent qualified service provider for School-Based Medicaid.

Consequently, the continuation of the bachelor's level school-based SLP creates inequity in job duties, more responsibility for the CCC-SLP colleague, and ultimately impacts the quality of services delivered to Nevada's students. I am in support of requiring a master's degree in Communication Sciences/Speech Pathology for all incoming educational SLPs, effective as soon as possible.

Christine Forti M.S. CCC-SLP

Speech Language Pathologist

ITEM A9: HEATHER GAYLORD

Summary of Public Comment:

Provided Public comment regarding NAC 391.370

Hello,

This is Dr. Heather Gaylord.

I am writing to follow up to my previous suggestions, which are included in the draft of proposed amendments to: NAC Chapter 391.277 – Endorsement to teach occupational therapy and NAC Chapter 391.279 – Endorsement to teach physical therapy. In the sections referring to assistant level staff working in occupational therapy and physical therapy, the proper wording is Occupational Therapy Assistant, and Physical Therapist Assistant. Note the use of therapy and therapist is different in the titles. This is the link showing the evidence for occupational therapy assistant: <https://www.nbcot.org/en/Public/Occupational-Therapy#RoleoftheOTRorCOTA> Here is the link showing the evidence for physical therapist assistant:

<https://www.apta.org/your-practice/licensure/national-physical-therapy-examination>

Thank you, and please feel free to contact me.715-557-0143

Heather Gaylord

Registered and Licensed Occupational Therapist

ITEM A10: KATHRINE FOWLER

Summary of Public Comment:

Provided Public comment regarding NAC 391.370

My name is Katherine Fowler and I am a Speech-Language Pathologist working in an elementary school setting. I am writing in support of the proposed changes to NAC 391.370, increasing the requirement for the Educational SLP to hold a master's degree effective in 2025. I received my undergraduate degree in Communicative Disorders in 1989 and immediately went on to pursue a master's degree in Speech-Language Pathology. I was told throughout my undergraduate career that in order to work in the field of Speech Pathology, I would have to get a master's degree. Much to my surprise, that was not true when I started in CCSD more than 30 years ago.

As an SLP holding a master's degree and Certificate of Clinical Competence, my roles and responsibilities in schools are well defined by the American Speech Language Hearing Association (ASHA) and the Nevada Speech Language Pathology, Audiology, and Hearing Aid Dispensing Board. I abide by the ASHA Code of Ethics and independently provide all services defined in the Nevada Medicaid School Health Services guide. My Bachelor's level peers who have significantly less specialized training than I do carry the same title, the same job description, and are on the same salary scale as me, yet are not required to meet these same standards and accountability, nor can they act as an independent qualified service provider for School-Based Medicaid.

Working in Clark County School District for the last 30 years, I have watched the extreme growth of our department, and can attest to the staffing crisis we had in the 1990s and 2000s in which our department relied heavily on the bachelor's level candidate as a new hire. In the past years, I have been excited to see proportionally more fully certified SLPs being hired in CCSD, and only a handful with a bachelor's degree. It appears that we are turning the corner on this need for alternative licensure. My Bachelor's level peers are, for the most part, competent and dedicated professional educators committed to this field through this alternate route. However, because the bachelor's level practitioner has no state governing body, and no ASHA Code of Ethics, there also exists a portion of this group that secured the job simply because it was an 'easy' and locally accessible degree.

The only nationally recognized path to a career in Speech Language Pathology is through pursuit of a master's degree and Certificate of Clinical Competence. Nevada is the last state in the country to allow this lesser license. It is our responsibility to catch up and elevate the license requirements in schools. Our students deserve this.

Thank you for addressing this need in our state.

Katie Fowler M.S. CCC-SLP

Speech-Language Pathologist

ITEM A11: LAURA LAIDLER

Summary of Public Comment:

Provided Public comment regarding NAC 391.370

My name is Lauren Laidler, and I am a Speech-Language Pathologist (SLP) working in Clark County School District. I am writing to support the proposed changes to NAC 391.370, particularly the sunset of the bachelor's degree allowance for the Department of Education Teacher of Speech Language Impaired license. I believe this should take effect immediately due to the reasons stated below.

As an SLP holding a master's degree and Certificate of Clinical Competence, my roles and responsibilities in schools are well defined by the American Speech Language Hearing Association (ASHA) and the Nevada Speech Language Pathology, Audiology, and Hearing Aid Dispensing Board. I abide by the ASHA Code of Ethics and independently provide all services defined in the Nevada Medicaid School Health Services guide. Bachelor's level peers have significantly less specialized training and carry the same title, the same job description, and are on the same salary scale as me, yet are not required to meet these same standards and accountability, nor can they act as an independent qualified service provider for School-Based Medicaid. Consequently, the continuation of the bachelor's level school-based SLP creates inequality in job duties, more responsibility for the CCC-SLP colleague, and ultimately impacts the quality of services delivered to Nevada's students.

Nevada also needs to be on the cutting edge of providing speech-language therapy services for their students. Nevada is the last state in the union to allow Bachelor level clinicians in the educational setting. Nevada is my home and it's tiring coming up short on every list regarding the education that is provided to our students. We are in a critical shortage and due the reasons stated above Nevada continually has issues with recruitment and retention of fully CCC licensed SLPs and other related services. Due to this, those of us operating at the top of our license are expected to increase our roles and responsibilities all while being compensated at the same rate of pay as our lesser qualified peers.

I am in support of requiring a master's degree in Communication Sciences/Speech Pathology for all incoming educational SLPs, effective immediately. Also, I support moving all related services and other licensed personnel to a different pay scale in our school districts across Nevada. Our services look different than those of a teacher and our services are reimbursable by Medicaid allowing our school districts to bring in millions for the services we provide.

Lauren Laidler MS, CCC-SLP

Speech-Language Pathologist

ITEM A12: KRISTEN NEVILLE

Summary of Public Comment:

Provided Public comment regarding NAC 391.XXX

On behalf of the American Occupational Therapy Association, I write to provide brief comments on the proposed changes to NAC 391.277. AOTA supports the proposed changes and thanks the COPS for working with us to amend the regulation to eliminate the requirement that occupational therapists obtain the AOTA specialty certification and to add a regulation to allow OTAs to obtain the endorsement.

I also respectfully request clarification as to the intent of exempting occupational therapy practitioners who obtain the endorsement from NAC 391.036 and NAC 391.065. Is it the case that exempting OTs and OTAs from these regulations will have the effect of not requiring OTs and OTAs to pass a competency exam in teaching, reading, etc and of not requiring an OT or OTA to provide evidence of completion of professional development to renew the endorsement? If yes, we would be supportive of exempting OTs and OTAs from those regulations because OTs and OTAs are already required to complete continuing education to maintain their occupational therapy license issued by the Nevada Board of Occupational Therapy and because OTs and OTAs do not “teach” in schools, but provide occupational therapy services to students under their license.

Thank you very much for any clarification you can provide. You can reach me at kneville@aota.org or at the below phone number. Thank you again.

Sincerely,

Kristen Neville

Manager, State Affairs

ITEM A13: GINA ELGAARD

Summary of Public Comment:

Provided Public comment regarding NAC 391.370

To Members of the Commission on Professional Standards in Education,

My name is Gina Elgaard and I am a Speech-Language Pathologist working in the educational setting for the Clark County School District and am writing to support the proposed changes to NAC 391.370 requiring a Master's degree for educational licensure in Speech Language Pathology.

I'm writing to support the amendment of proposed changes to NAC 391.370, specifically the sunset date of September 30, 2025, and the removal of the Core Praxis exam requirement.

Here's why:

In 1987, I graduated from Long Beach State with a Master's Degree in Communicative Disorders. In college I served as the chapter president for the National Student Speech Language Hearing Association (NSSLHA). I maintain my ASHA Certificate of Clinical Competence and the Nevada Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board license by yearly participation in professional development courses. I have worked 26 years serving students of all ages in the Clark County School District (CCSD). Prior to this I provided therapies in skilled nursing facilities across Southern California, and then as an itinerant SLP in Saskatchewan, Canada. And I'm thankful to have had the opportunity to serve as Vice President and President of the Nevada Speech Language Hearing Association.

My education and experience have provided me with a valuable awareness for recognizing the importance of Speech-Language Pathology (SLP) services delivered daily to our Nevada students. Nevada's schools are experiencing a drastic shortage of highly qualified SLPs. This puts the students at risk for receiving less than adequate quality of service and places a heavy burden on qualified SLPs who hold a master's degree and Certificate of Clinical Competence. Parents are aware of the dire situation and have voiced their concerns that children are not receiving services in a timely manner and SLPs who may be providing the services have significantly less specialized training and do not meet the same standards as does a qualified speech-language pathologist.

Also, the workload for many school-based SLPs who hold a master's degree and Certificate of Clinical Competence will spend approximately half of each week away from their student caseload in order to consult and monitor the Bachelor level school-based SLPs who are not able to function as independent qualified service providers for School-Based Medicaid billing. (The Bachelor level school-based SLP outnumber the school-based SLP who hold a master's degree and Certificate of Clinical Competence).

Sincerely, Gina Elgaard, M.A., CCC-SLP

ITEM A14: NANCY KUHLES

Summary of Public Comment:

Provided Public comment regarding NAC 391.370

Dear Director Briske, President West-Guillen, and Members of the Commission on Professional Standards in Education,

For the record, 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. On the Commission on Professional Standards in Education agenda, Item#7, and the related support material, I would like to address NAC 391.370, the proposed regulation to amend standards to obtain a speech language pathology education license. Per the minutes from the Commission on Professional Standards in Education meeting on February 24, 2022, the NSHA/NV Coalition agrees with an effective sunset date of September 30, 2025.

On behalf of the NSHA/NV Coalition to Address Personnel Shortages, I am in support of the 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))
- This change will align licensure with professional recognized standards (ASHA)
- This change in personnel standards makes the educational success of school-age children and youth with speech, language, and hearing disabilities a top priority

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" the supervisor's license, posing a personnel impact, workload impact and fiscal impact.

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

Per the minutes from the Commission on Professional Standards in Education meeting on February 24, 2022

https://doe.nv.gov/Boards_Commissions_Councils/Commission_on_Professional_Standards/Meeting_Materials/ ,

the NSHA/NV Coalition agrees with sunset date of September 30, 2025 to amend NAC 391.370 and change the licensing qualifications for speech-language pathologists to a master's degree or higher in Speech-Language Pathology. The sunset date of September 30, 2025 allows currently enrolled NSC speech pathology undergraduates to graduate and apply for a license. Delaying of this sunset date allows the continuation of less rigorous personnel qualifications in the schools and a two-tiered system of services to children and youth needing speech and language services in Nevada.

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 align licensure with professional recognized standards, will help districts and charter schools' ability to access Medicaid funding, will not cause a loss of providers of speech and language services and will remove a two-tiered system of services to children and youth needing speech and language services in Nevada.

The NSHA/NV Coalition to Address Personnel Shortages supports the proposed regulation to amend standards to obtain a speech language pathology education license and the sunset date of September 30, 2025 and kindly requests your consideration to approve the proposed amendments to NAC 391.370.

Thank you for your time.

Sincerely,

Nancy Kuhles,