







improvements made. Instead of adding an additional license, teachers can add an additional endorsement for the cost of \$50. A background check is not required to add any additional endorsements. Teachers will still have three years to complete coursework and be able to submit two years of effective evaluations in order to convert to a standard license. Districts will not need to report teachers as out of field because they will have the special education endorsement on their license. The Interim Route to Certification program is available to all licensed teachers who wish to be certified in an area of special education. Director Briske reminded the Commission that this item is for discussion only and the item was brought to their attention as information regarding filling our special education vacancies.

President West asked the Commission if they had any questions or comments.

Commissioner Wenger inquired if districts would continue to report the educators using this pathway as teaching out of field until the educators fulfill the new requirements.

Director Briske responded that districts would not have to report the educators as out of field because the educators would have an endorsement on their license once they agree to this program. Commissioner Morgan thanked the efforts put into making this program happen because having a more standardized process will assist in clarifying what each candidate will need to obtain these endorsements. He further described how candidates go into teacher preparation programs receiving mixed messaging on how to get the endorsement data and what courses they should take. Therefore, this process will clarify the requirements to add additional endorsements onto their license in a more standardized streamlined path and help support some of the shortages. From the teacher preparation program level, Commissioner Morgan stated he supported the Interim Route to Certification.

Director Briske clarified for the Commission that this item will not be brought back as it is not a workshop or a public hearing. It is a policy the Department is implementing. This policy is based on the special education regulations. It is now a formalized program with a standardized form that districts will complete and teachers will submit to the Department when making an application for the endorsement.

**7. PUBLIC HEARING TO SOLICIT COMMENTS ON PROPOSED REGULATION 125-22 AMENDING NAC 391.036 – TESTS OF COMPETENCY REQUIRED FOR INITIAL LICENSE; EXEMPTIONS; FAILURE TO COMPLY; NAC 391.065 – RENEWAL OF LICENSE: EDUCATIONAL AND PROFESSIONAL REQUIREMENTS; EXCEPTIONS; NAC 391.370 – QUALIFICATIONS FOR TEACHING PUPILS WHO HAVE SPEECH AND LANGUAGE IMPAIRMENTS. (*Information/Discussion/For possible action*)**

President West opened the public hearing at 9:20 a.m. to solicit public comment on proposed [Regulation 125-22](#) amending [NAC 391.036](#), [NAC 391.065](#), [NAC 391.370](#).

Director Briske referred to the [supporting documents](#) for this item. In regulation 125-22, section one contained conforming language regarding exam requirements. Section two contained conforming language regarding renewal requirements. Section three eliminated certain exams and renewal requirements for speech language pathologists holding a master's degree and certificate of clinical competence in speech language pathology. Section four eliminates the bachelor's degree

pathway beginning October 2026 and allows individuals already licensed with a bachelor's degree a pathway to maintain and renew their license.

Public comment for this item was provided by Tami Brancamp and Jennifer Pierce in support of extending provisional licenses and competency test exemptions. (See Appendix Item A3)

Public comment for this item was also provided by Flor Mowery in support of the changes to the proposed Regulation 125-22 but asked the Commission to consider adding a license for Speech-Language Pathology Assistants. (See Appendix Item A4)

Public comment from seven school-based Speech Language Pathologists in support of adding the master's degree requirement for Speech Language Pathologists. (See Appendix Item A5)

Public comment from the American Speech Language Association in support of the language in NAC 391.370 with the recommendations on how the programs described in section 3 are accredited. (See Appendix Item A6)

President West asked for clarification to the representatives from the American Speech Language Hearing Association that the language amending Regulation 125-22 met the intent of the organization.

The representative from the American Speech Language Hearing Association responded it did meet that intent.

President West asked Commissioners if they had any questions or comments.

Commissioner Wenger commented there has been a lot of support for this this amendment. She wanted to acknowledge the letter from the public comment that the Commission may want to consider an alternative like an assistant pathway for speech pathologists like what the Commission considered for school psychology assistants. School psychologists receive much assistance from support staff and speech language pathologists could use those supports as well.

President West stated that action will have to be brought back from the Department at a later time.

No additional questions or discussion from the Commission arose.

**President West asked for a motion to adopt the proposed Regulation 125-22. Commissioner Wenger moved to adopt this regulation and forward on to the State Board. Commissioner Belknap seconded this motion. Motion passed unanimously.**

**8. PUBLIC HEARING TO SOLICIT COMMENTS ON PROPOSED REGULATION 128-22 AMENDING NAC 391.XXX – ESTABLISHING STUDENT TEACHER RESIDENT LICENSE. (*Information/Discussion/For possible action*)**

President West opened the public hearing at 9:32 a.m. to solicit public comment on proposed [Regulation 128-22](#) amending NAC 391.XXX. There was no public comment for this item.

Director Briske referred to the [supporting documents](#) for this item. In Regulation 128-22, section two created a special license with an endorsement as a student teacher resident, delineated the requirements to obtain and maintain this license and described a reduced fee for this license. Section three delineated employment and supervision requirements as well as compensation opportunities. Sections four and five contained conforming language to the previous sections described.

President West asked the Commission if they had questions or discussions relating to the proposed Regulation 128-22.

Commissioner Belknap commented he believes this is a great change to eliminate some of the barriers to entry for people trying to become educators. It can be a big challenge to be able to take off six months from earning a living and completing the student teaching requirements to be able to then go on to become an educator. That has been a barrier for a long time, and he is excited to see there are steps taken to eliminate that barrier.

Commissioner Belknap further questioned if the payment of Alternative Route to Licensure (ARL) students at full contracted rate is a decision that is made by the districts or if it is something that is already in policy. Commissioner Belknap added if there was already a policy in place, what the logic behind the Commission would be in putting these ARL students at a long-term sub pay.

Director Briske responded the Commission does not set employment contracts or rate of pay. What the Commission does is offer availability and options for that compensation. ARL candidates do have a bachelor's degree and a license. They are licensed teachers. The student teacher resident license in the proposed regulation states they do not have a bachelor's degree yet. They are student teacher residents, supervised by a master teacher. The intent is to compensate them at least at the long-term substitute pay rate. There are currently some Elementary and Secondary School Emergency Relief (ESSER) funds for stipend payments that would be in addition to the long-term substitute pay rate for their student teaching. The Department hopes to continue this funding by requesting State General Funds during the next legislative session.

Commissioner Morgan commented this is a great initiative as we have moved into para-educator programs and supporting pathways for people coming into the teaching profession. As noted by Commissioner Belknap, pay and opportunity supporting families in life during student teaching is one of the biggest barriers reported to teacher preparation programs. He has spoken to many candidates who completed all coursework except student teaching because of salary and this pathway breaks down a major barrier. Commissioner Morgan added he commends the work done by the Department within this area.

Commissioner Morgan then questioned if there are any corresponding or anticipated corresponding changes to requirements in licensure programs to support this resident license or would it be up to

the teacher preparation programs to internally figure out the policies, to figure out how to support student teacher residents who would be working with a license like this.

Director Briske responded the Department is in conversation with some professional organizations to bring discussions back to the institutions of higher education. The discussions would be focused on common third year programming for the Nevada System of Higher Education (NSHE). Continued conversation on what the residency year would look like and coursework that would need to occur. Since NSHE are the experts in that field, the Department would like to leave those decisions up to them and continue to be in conversation with them if we move forward with additional regulation around this type of programming.

Commissioner Rozar commented she appreciated the efforts by the Department and the Commission to get student teachers and licensed teachers into the classroom more quickly. The teacher shortage crisis is real and any quicker method to get student teachers and licensed people in the classroom in front of students is much appreciated.

**President West asked for a motion to adopt proposed Regulation 128-22. Commissioner Hawkins moved to adopt proposed Regulation 128-22. Commissioner Belknap seconded this motion. Motion passed unanimously.**

**9. PUBLIC HEARING TO SOLICIT COMMENTS ON PROPOSED REGULATION 129-22 AMENDING NAC 391.XXX – ESTABLISHING REGULATION PER SENATE BILL 352 (2021); NAC 391.055 - PROVISIONAL 1-YEAR LICENSURE OR ENDORSEMENT OF PERSON WHO HOLDS RENEWABLE LICENSE ISSUED IN THIS STATE.**  
*(Information/Discussion/For possible action)*

President West opened the public hearing at 9:39 a.m. to solicit public comment on proposed [Regulation 129-22](#) amending NAC 391.XXX. There was no public comment for this item.

Anabel Sanchez referred to the [supporting documents](#) for this item. Regulation 129-22, section 1, subsection 1, allows a paraprofessional to complete a program of student teaching to qualify for an initial license while remaining employed. Subsection 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. Subsection three, allows school psychology interns providing services and support while enrolled in a program to obtain a license or endorsement to complete such program of internship while remaining employed. Section 2 amends NAC 391.055 which contains conforming language to the previous sections.

President West asked the Commission if they had questions or discussions relating to the proposed Regulation 129-22.

No questions or comments from the Commission arose.

**President West asked for a motion to adopt proposed Regulation 129-22. Commissioner Rozar moved to adopt proposed Regulation 129-22 as written and explained. Commissioner Morgan seconded this motion. Motion passed unanimously.**

**10. FUTURE AGENDA ITEMS (*Information/Discussion*)**

Director Briske informed the Commission that there will be additional public hearings. Two public hearings are already posted for November. He looks forward to additional public hearings in January and February.

Election of officers will occur at the November meeting and will be conducted by Senior Deputy Attorney General Gardner. If commissioners would like to consider serving as President or Vice President, they can nominate themselves or have someone nominate them.

Meeting dates for 2023 were explained. The Commission was reminded that they do not typically meet in December or at least one or two dates in the summer as the work of the Commission slows down a bit in the summertime. The Commission is welcome to edit or eliminate some of the summer dates if they would like. This information was presented for the Commission to keep in mind as they discuss the meeting dates for 2023 and to adopt the schedule at the November meeting.

**11. PUBLIC COMMENT #2**

There was no public comment.

**12. ADJOURNMENT**

Commissioner Rozar moved to adjourn the meeting. Commissioner Wenger seconded. Motion carried unanimously. The meeting adjourned at 9:45 A.M.



## **APPENDIX A: STATEMENTS GIVEN DURING PUBLIC COMMENT**

1. Nancy Kuhles, Speech Pathologist provided public comment regarding NAC 391.036 and NAC 391.370. *(A summary of the statement is available in Appendix A1)*
2. Susan Keema, Executive Director of the Nevada Association of School Superintendents provided public comment regarding Regulation 122-22. *(A summary of the statement is available in Appendix A2)*
3. Tami Brancamp and Jennifer Pierce, Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board provided public comment regarding NAC 391.370. *(A summary of the statement is available in Appendix A3)*
4. Flor Mowery, Speech Language Pathologist Administrator provided public comment regarding NAC 391.370. *(A summary of the statement is available in Appendix A4)*
5. Speech Language Pathologists in the Clark County School District (CCSD) provided public comment regarding NAC 391.370. *(A summary of the statement is available in Appendix A5, this is the same statement of seven other Speech Language Pathologists from CCSD)*
6. Judy Rich, President of the American Speech Language Hearing Association provided public comment regarding NAC 391.370. *(A summary of the statement is available in Appendix A6)*

### **ITEM A1: NANCY KUHLES**

Summary of Public Comment:

Provided Public comment regarding NAC 391.036 and 391.370

October 19, 2022

Good morning, Director Briske, President West-Guillen, and Members of the Commission on Professional Standards,

For the record, my name is Nancy Kuhles. I am a Speech-Language Pathologist and Co-Chair of the Nevada Speech-Language-Hearing Association (NSHA) Coalition to Address Personnel Shortages. I would like to address Item # 7 on the Commission of Professional Standards agenda, specifically NAC 391.036 the proposed regulation to exempt certain licensees from additional competency testing, and NAC 391.370, 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 both regulatory changes.

The NSHA Coalition is in support of master's level Speech-Language Pathologist, who hold 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 an individual 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, to be exempt from the requirements of NAC 391.036, which requires a test of competency for initial licensing and certain requirements for renewing the license.

These highly trained practitioners are competent in knowledge and skills necessary to practice in the field of speech language pathology.

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 Coalition supports the proposed regulation 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 will align licensure with professional recognized standards (ASHA)
- This change will remove a two-tiered system of services to children and youth needing speech and language services in Nevada
- This change in personnel standards makes the educational success of school-age children and youth with speech, language, and hearing disabilities a top priority
- This change will help districts' and charter schools' ability to access Medicaid funding to support the provision of a wide range of services needed to educate students with speech, language, and hearing disabilities and ensure compliance with IDEA requirements
- 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 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 qualifications to obtain a speech language pathology education license, and kindly requests your consideration to approve the proposed regulation to amend NAC 391.036 and NAC 391.370.

Thank you for your time.

Sincerely,

*Nancy*

Nancy Kuhles

**ITEMA2: SUSAN KEEMA**

Summary of Public Comment:

Provided public comment regarding Regulation 122-22

October 17, 2022

To: Jeff Briske, Director, Nevada Department of Education  
Office of Educator Development, Licensure & Family Engagement

From: Susan Keema, Executive Director  
Nevada Association of School Superintendents

Re: Regulation R122-22

The Commission on Professional Standards in Education will be holding a regulation hearing October 19 for the purpose of approving R122-22. The intent of R122-22 is to better prepare our teachers, who are prepared by a Nevada approved teacher preparation program, to educate our second language students. The ARL pathway students in NAC 391.461 and the traditional pathway students in NAC 391.577 would be required to take 12 additional credits of English Language and Academic Development course work, as identified in NAC 391.237, to complete their program. This program requirement would be required for those students who start their program one year after July 1, 2023.

NASS Statement:

The Nevada Association of School Superintendents opposes proposed regulation 122-22 as currently written. NASS views the regulation requirements as creating additional barriers to an already existing teacher shortage.

Rationale:

1. The regulation recommends adding 5 classes to the ARL and traditional pathways in approved Nevada teacher preparation programs. The proposed regulation does not remove 5 existing required courses for the degree.  
Result: An additional semester of coursework and the associated costs for the additional courses will be required of students pursuing an education degree.
2. Districts and the Nevada Department of Education need to work with higher education partners to ensure that teacher prep programs match high yield instructional outcomes that can adapt to an ever-changing world of education. Coursework expectations for teacher education programs should be in the program itself and (not in addition to)--parent engagement, the multicultural requirement and these Language Acquisition expectations can all be done in general program coursework.
3. The initial license should be the minimum needed to be a probationary licensed educator

Summary:

The courses suggested in R122-22 do support Nevada's student demographics and can be used to increase student achievement for all groups. However, adding coursework without looking at existing programs of study is a roadblock against our common goal of getting qualified teachers into classrooms in a timely manner.

**ITEM A3: TAMI BRANCAMP AND JENNIFER PIERCE**

Summary of Public Comment:

Provided public comment regarding Regulation 125-22

October 17, 2022

Nevada Department of Education  
Commission on Professional Standards in Education  
Via Email: [COPS@doe.nv.gov](mailto:COPS@doe.nv.gov)

**RE: Public Comment on Agenda Item 7:** Public Hearing to Solicit Comments on Proposed Regulation 125-22 Amending NAC 391.370 – Qualifications for teaching pupils who have speech and language impairments

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

We are writing on behalf of the Nevada Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board in support of the proposed revisions to NAC 391.370 in LCB File No. R125-22 that would require a person teaching students with speech and language impairments to hold a master's degree or higher in Speech/Language Pathology or Communication Disorders/Sciences and the ASHA Certificate of Clinical Competence, or a Standard or Provisional SLP license issued by this Board.

The Board supports raising the minimum requirements for NDE personnel to meet the national standard and appreciates the significance of finally aligning NDE and Board of Examiners licensing/endorsement requirements for Nevada practitioners. The Board would like to acknowledge and thank its NDE, University, and Association partners for the thoughtful and collaborative effort put into this endeavor, as the Board believes this change will positively impact Nevada students and other consumers of speech-language pathology services.

Very Respectfully,

Tami U. Brancamp, Ph.D. Board Chair

Jennifer R. Pierce Executive Director

**ITEM A4: FLOR MOWERY**

Summary of Public Comment:

Provided public comment regarding NAC 391.370

Hello,

My name is Flor Mowery and I am a SLP administrator in CCSD. I am in support of the proposed changes to the requirements for the educational SLP. However, I am worried that we will not be able to fill positions should this pass. Trend data in 2022-23 and 2021-22 has shown that our critical labor shortage has become even more severe. If we were to radically change the requirements for the educational SLP, I am afraid the human capital gap will widen even more.

Nevada students deserve the full scope of training and practice from their school-based SLPs. I am proposing that this board move forward with these proposed changes, but consider adding a different licensure type to include Speech-Language Pathology *Assistants* (commonly referred to as SLPAs) so that detrimental student services are not even more negatively impacted. Thank you.

**ITEM A5: SPEECH LANGUAGE PATHOLOGISTS IN CCSD**

Summary of Public Comment:  
Provided public comment regarding NAC 391.370

Re: NAC 391.370, the sunseting the Bachelor's level SLP licensure

My name is Shaily Rivera and I am an SLP in CCSD. I am in support of the proposed changes to the requirements for the educational SLP. Nevada is currently THE ONLY state in the nation who does not require a Licensed, Nationally Certified Speech/Language Pathologist to practice in our schools. There is a reason why the American Speech/Language/Hearing Association requires a Masters in Speech Pathology to obtain National Certification and anything less is negligent and a disservice to the children of Nevada. Nevada students deserve the full scope of training and practice from their school-based SLPs.

--

Shaily Rivera, M.S. CCC-SLP

**ITEM A6: JUDY RICH**

Summary of Public Comment:  
Provided public comment regarding NAC 391.370

October 6, 2022

Mr. Aaron West-Guillen  
President, Commission on Professional Standards in Education  
Nevada Department of Education  
2080 E. Flamingo Rd.  
Las Vegas, NV 89119-0811

RE: Proposed Speech-Language Pathology Education Changes

Dear President West-Guillen:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments on the proposed regulatory changes increasing the educational requirements for those seeking an endorsement to teach pupils, ages 3 to 21, inclusive, who have speech and language impairments in Nevada.

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.<sup>i</sup>

While supportive of the language in Sec. 3. NAC 391.370 a. for those providing services in school settings, ASHA recommends that this section be amended to reflect how these programs are currently accredited:

“Submit a transcript, which indicates the person holds a master’s degree or a more advanced degree in [an area of concentration in speech and language impairments conferred by a regionally accredited college or university] speech-language pathology, communication disorders, communication sciences or an equivalent field from an institution accredited by the Council on Academic Accreditation in Audiology and Speech-Language Pathology of the American Speech-Language-Hearing Association or equivalent and hold:

- (1) A Certificate of Clinical Competence in [speech] speech-language pathology from the American Speech-Language-Hearing Association; or
- (2) [An equivalent] A standard license or provisional license from the Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board created by NRS 637B.100.”

Accreditation by the Council on Academic Accreditation in Audiology and Speech-Language Pathology offers third party verification that the program has met standards of excellence for students entering the professions of audiology and speech-language pathology.<sup>ii</sup>

ASHA also supports the exemption from the requirement to pass a competency test in the subject matter of the area of endorsement if an individual:

- is applying for an endorsement to teach pupils who have speech and language impairments and
- submits to the Department of Education official documentation indicating that he or she has received a Certificate of Clinical Competence in Audiology (CCC-A) or Speech-Language Pathology (CCC-SLP).

Nevada is the only state in the country allowing SLPs with a bachelor’s degree to service children in school settings. These regulations will 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 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 changes for standards for SLPs in school settings. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).



Sincerely,  
Judy Rich, EdD, CCC-SLP, BCS-CL  
2022 ASHA President

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<sup>i</sup> American Speech-Language-Hearing Association. (2022). *Nevada* [Quick Facts].  
<https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/nevada-state-flyer.pdf>.

<sup>ii</sup> Council of Academic Accreditation. (n.d.). *About the CAA*  
<https://caa.asha.org/about/>.