

**NEVADA DEPARTMENT OF EDUCATION
COMMISSION ON PROFESSIONAL STANDARDS IN EDUCATION
SEPTEMBER 16, 2026
9:00 AM**

Office	Address	City	Meeting
Department of Education	2080 E. Flamingo Rd.	Las Vegas	Suite 114
Department of Education	700 E. Fifth St.	Carson City	Board Room
Department of Education	YouTube Live Stream w/captions	n/a	Link

DRAFT SUMMARY MINUTES OF THE COMMISSION MEETING

COMMISSION MEMBERS PRESENT:

In Las Vegas:

Commissioner Toby Babina
Vice President Shartriya Collier
Commissioner Maria DeWeerd
Commissioner Christina Hollowood
President Amy Rozar
Commissioner Teresa Schultz

In Carson City:

Commissioner Hope Blinco
Commissioner Michele Haugen
Commissioner Jamie Hawkins
Commissioner Dan Sadler
Commissioner Shanon Taylor

Virtually:

Commissioner Rozane Deighan

COMMISSION MEMBERS NOT PRESENT:

Commissioner Kenny Belknap

DEPARTMENT STAFF PRESENT:

In Las Vegas:

Jeff Briske, Commission Secretary and Director of Educator Development, Licensure and Family Engagement (EDLiFE)
Amelia Thibault, Legislative Liaison, Nevada Department of Education
Geri Mendiola, Administrative Assistant III, EDLiFE

In Carson City:

Jackie Nygaard, Education Programs Professional, EDLiFE
Jason Dye, Administrative Assistant II, EDLiFE

LEGAL STAFF PRESENT:

Deputy Attorney General Christena Georgas-Burns

AUDIENCE IN ATTENDANCE

In Las Vegas:

Anna Adkins, Director, Government Relations, Clark County School District

Carson City:

None

PRESENTERS:

Jacki Nygaard, Education Programs Professional, EDLiFE

Amelia Thibault, Legislative Liaison, Nevada Department of Education

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

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

2. PUBLIC COMMENT #1

1. Anna Adkins, Director of Government Relations, Clark County School District, provided public comment in Las Vegas regarding
 - Agenda Item #8, R013-26, Science of Reading Licensure Requirement
 - Agenda Item #10, R151-26, Endorsement to serve as a school nurse
 - Agenda Item #14, T001-26, Authorization to serve without an endorsement as a school social worker. *(A summary of the statements are available in Appendix A).*
2. Evan Fakhreddine, Neuro Thrive, provided a written public comment regarding agenda item #7, R102-25, Endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant. *(A summary of the statement is available in Appendix A).*
3. Kristen Neville, Manager State Affairs, American Occupational Therapy Association, provided a written public comment regarding agenda item #7, R102-25, Endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant. *(A summary of the statement is available in Appendix A).*
4. Matt Olivier, Nevada Occupational Therapy Association, provided a written public comment regarding agenda item #7, R102-25, Endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant. *(A summary of the statement is available in Appendix A).*
5. Elise Johnson, Board Member, Nevada School Counselor Association, provided a written public comment regarding agenda item #13, R159-26, To allow a person who is enrolled in a program for school counseling to complete their internship while working in a school. *(A summary of the statement is available in Appendix A).*

There were no public comments in Carson City.

3. PRESIDENT'S REPORT

President Rozar recognized the observance of Suicide Prevention Week, National Arts in Education Week, and National Hispanic Heritage Month, highlighting various engagement activities across schools and districts. Also mentioned was the upcoming Week of Respect at the end of the month.

4. APPROVAL OF MAY 20, 2026, MINUTES (*INFORMATION/DISCUSSION/FOR POSSIBLE ACTION*).

President Rozar asked the Commission if there are any discussions regarding the May 20, 2026, meeting minutes. No discussion was made regarding the May 20, 2026, minutes. President Rozar entertained a motion to approve the May 20th meeting minutes.

Motion: Commissioner Schultz moved to approve the May 20, 2026, meeting minutes. Vice President Collier seconded the motion. Motion carried unanimously and the May 20th meeting minutes were approved.

5. COMMISSION MEETING DATES FOR CALENDAR YEAR 2027. (*INFORMATION/DISCUSSION/POSSIBLE ACTION*).

Director Briske presented the proposed meeting dates for the 2027 calendar year, noting that district calendars, holidays, and spring breaks were considered. He also noted that the October 21 meeting was canceled due to scheduling and lack of Commission business. Commissioner Schultz requested double checking the proposed May 2027 date due to secondary school final exam schedules.

Motion: Commissioner Schultz moved to adopt the 2027 calendar year proposed meeting dates with double checking the May 2027 date. Commissioner DeWeerd seconded the motion. Motion carried unanimously.

6. NEW PLT PRAXIS EXAM. (*INFORMATION/DISCUSSION/FOR POSSIBLE ACTION*).

The Commission reviewed the current Principals of Learning and Teaching (PLT) exam requirements and considered approving and adding the K-12 PLT for certain educators. If approved and adopted the K-6 PLT and/or 7-12 PLT tests would not be required for K-12 licensure applicants. The Commission may adopt or not adopt the K-12 PLT #5625 exam for K-12 teaching licenses.

Director Briske detailed that the Principals of Learning and Teaching exams are required for those as listed on the chart in the meeting materials. He explained for transparency, Nevada Administrative Code (NAC), states that the Elementary license requires the K-6 PLT in addition to the multiple subject area tests, middle school licenses require the 5-9 PLT, and secondary licenses require the 7-12 PLT. The Department is requesting consideration from the Commission to approve and add the K-12 PLT for K-12 teaching licenses with a passing score of 150.

President Rozar asked the Commission if there were any further questions or discussions. Commissioner Schultz sought clarification on whether this new exam would replace existing requirements or simply offer an additional option. Director Briske explained that the proposal intended to replace the previous three PLT options for K-12 license holders. However, he reassured the Commission that a standard transition overlap period would apply, meaning any applicants who had already registered for or have taken the former exams would still have those results honored.

President Rozar asked the Commission if there were any further questions or discussions. There were none and she entertained a motion to approve and adopt the K-12 PLT exam for K-12 licensure applicants with a passing score of 150.

Motion: Vice President Collier moved to approve and adopt the K-12 PLT exam for K-12 licensure applicants with a passing score of 150. Commissioner Schultz seconded the motion. Motion carried unanimously.

7. PUBLIC HEARING R102-25 TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.XXX – ENDORSEMENTS TO PROVIDE ASSISTANT OCCUPATIONAL OR PHYSICAL THERAPIST SERVICES TO PUPILS, NAC 391.277 – ENDORSEMENT TO PROVIDE SERVICES TO PUPILS AS AN OCCUPATIONAL THERAPIST, AND NAC 391.279 – ENDORSEMENT TO PROVIDE SERVICES TO PUPILS AS A PHYSICAL THERAPIST. (INFORMATION/DISCUSSION/FOR POSSIBLE ACTION).

President Rozar announced Public Hearing for R102-25 at 9:28 a.m. The Commission considered a regulation relating to educational personnel; revising certain qualifications to receive an endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant; revising certain qualifications to receive an endorsement to provide services to pupils as a physical therapist and physical therapist assistant; and providing other matters properly relating thereto. This regulation will require persons to hold such an endorsement for the relevant assignment and delineates minimum degree requirements. The Commission may adopt or not adopt this regulation.

President Rozar asked the Commission if there were any questions or discussions regarding R102-25. Commissioner Haugen asked what the cost association for the endorsement was for the endorsement. Director Briske confirmed that for the initial license the cost is \$210.00 and the renewal is \$180.00. Questions were also raised regarding how the regulation would impact independent contractors. While the Commission initially understood that contractors working in public schools would need to hold the required license, Deputy Attorney General, Christena Georgas-Burns, noted she would confirm the exact legal application, though she agreed that public school standards typically apply broadly to protect students.

In response to questions about the regulation's broader impact and potential redundancy, Director Briske clarified that the changes would not apply retroactively to currently licensed employees in those roles; rather, they would affect only new applicants once enacted. Addressing public feedback about redundant licensing, Director Briske explained that occupational and physical therapists were the last remaining occupational groups not yet required to hold a Nevada Department of Education (NDE) license alongside their state board licenses. He emphasized that the primary reason for the NDE license requirement was student safety, specifically noting that while state boards conduct background checks upon initial licensure, they do not require them for renewals, whereas NDE mandates background checks for every renewal.

Regarding concerns raised in public comments about degree requirements, Director Briske noted that the proposed regulation set lower minimum degree requirements—a bachelor's degree for occupational therapists and a master's degree for physical therapists—than the higher credentials, master's and doctorate, respectively, currently required by their state boards. This deliberate accommodation was made in collaboration with professional associations to avoid excluding seasoned professionals who earned their state board licenses under earlier standards.

President Rozar opened the floor for action on whether to adopt or table the regulation. Vice President Collier expressed a desire to conduct further research into the full impact of the policy across the state.

A motion was made by President Rozar to table the regulation 102-25 for additional information. The motion passed unanimously and the item was officially postponed for discussion at a future meeting.

8. PUBLIC WORKSHOP R013-26 TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.XXX – SCIENCE OF READING LICENSURE REQUIREMENT, NAC 391.065 – RENEWAL OF LICENSE: EDUCATIONAL AND PROFESSIONAL REQUIREMENTS; EXCEPTIONS, NAC 391.070 – RENEWAL OF LICENSE: GENERAL REQUIREMENTS; FEE; DELAY OF EXPIRATION DATE BY SUPERINTENDENT OF PUBLIC INSTRUCTION, NAC 391.089 – QUALIFICATIONS FOR LICENSE TO TEACH PUPILS IN A PROGRAM OF EARLY CHILDHOOD EDUCATION, AND NAC 391.095 – QUALIFICATIONS FOR ELEMENTARY LICENSE. (INFORMATION/DISCUSSION/FOR POSSIBLE ACTION).

President Rozar announced Public Workshop for R013-26 at 9:37 a.m. The Commission considered a regulation relating to educational personnel; requiring certain applicants for the issuance of a renewable license to teach early childhood and elementary education and applicants for the renewal of such a license to complete a course of instruction in foundational literacy skills; prescribing requirements concerning a course of instruction in foundational literacy skills; requiring an applicant for such a license to complete such a course while enrolled in a teacher preparation program or a program for an alternative route to licensure; and providing other matters properly relating thereto.

Director Briske clarified that there are two distinct Science of Reading requirements to implement from Senate Bill 460.

The first requirement is a professional development employment requirement that all administrators, educators, and paraprofessionals who engage with students in grades K-3, to complete 15 clock hours of professional development (PD) on or before June 30, 2028, or within three years of hire. This requirement is tracked by employers.

The second requirement is a 45 hour or 3 semester course licensure requirement for people who apply for an early childhood or elementary license on or after July 1, 2028. Approved preparation programs must have such a course or components embedded in their early childhood and elementary programs by July 1, 2028. Applicants from non-approved prep programs and licenses issued via reciprocity will have this requirement due at their first renewal.

Approved 15-hour PD courses for employment and 45-hour/3 semester courses are listed on the Department's website maintained by the Offices of Teaching and Learning and Educator Development, Licensure and Family Engagement.

President Rozar asked the Commission if there were any questions or discussion regarding this agenda item. Commissioner Haugen questioned why 45 hours was chosen as the required duration, pointing out that existing pre-K programs such as LETTRS training typically offered only 35 hours and lacked early childhood applicability. Director Briske explained that Senate Bill 460 specified a "course of instruction," which traditionally equates to a 3-semester hour college course (45 class hours). He noted that the requirement encompassed broader topics beyond the five core components of reading, such as classroom behavior management, and invited school districts to submit supplemental training programs or vendor courses for Department approval.

Commissioner Taylor inquired whether all required topic components (3A through E) had to be contained within a single literacy course or if they could be spread across different classes within a teacher preparation

program. Director Briske confirmed, referencing page 4 of the proposed regulation, that the components did not need to be in a single course and could instead be embedded throughout an approved program, provided the institution designated where each requirement was fulfilled.

There were no further questions or discussions; President Rozar entertained a motion to move regulation 013-26 to a Public Hearing.

Motion: President Rozar moved to move R013-26 to a Public Hearing. Commissioner DeWeerd seconded the motion. Motion carried unanimously.

9. PUBLIC WORKSHOP R132-26 TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.XXX – HIRE PENDING NEVADA DEPARTMENT OF EDUCATION LICENSURE. (INFORMATION/DISCUSSION/FOR POSSIBLE ACTION).

President Rozar announced Public Workshop R132-26 at 9:47 a.m. The Commission considered a regulation relating to educational personnel; establishing requirements for a person who holds a license to teach in another state to be hired and employed on a provisional basis as a teacher in this State; requiring a school district or charter school to use the form prescribed by the Department of Education to notify the Department upon hiring such a person as a teacher; requiring a school district to terminate the employment of such a person if the person fails to provide evidence of the issuance of a license to teach in this State within 1 year of commencing employment; and providing other matters properly relating thereto. This regulation will comply with AB49 (2025) allowing a public-school employer to hire a teacher without an endorsement. The Commission may move or not move this regulation to a Public Hearing.

Director Briske noted that this regulation is self-explanatory, allowing employers to hire teachers pending NDE licensure. Commissioner Schultz sought clarification on the hiring requirements. Director Briske confirmed that candidates must hold a valid out-of-state teaching license, pass a fingerprint background check, and provide proof of application for a Nevada license before being hired. He added that if the employee does not present their Nevada license by the end of the specified timeframe, the school district must terminate their employment. Commissioner Sadler noted the practical implications for school districts regarding hiring calendars and notifications, observing that a full calendar year timeline might overlap with typical district re-hiring deadlines, though he expressed appreciation for the added hiring flexibility. Commissioner Babina asked if the timeframe was one year or the end of the school year, whichever is shorter. Director Briske confirmed that the shorter timeframe was correct. He noted that although that specific language might not have appeared in the current draft presented, the update had been submitted to the Legislative Council Bureau and would be reflected when the regulation returned for Public Hearing.

There were no further discussions; President Rozar entertained a motion to move regulation 132-26 to a Public Hearing.

Motion: Vice President Collier moved to move regulation 132-26 to a Public Hearing. Commissioner Schultz seconded the motion. Motion carried unanimously.

10. PUBLIC WORKSHOP R151-26 TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.305 – ENDORSEMENT TO SERVE AS A SCHOOL NURSE AND NAC 391.307 – AUTHORIZATION TO SERVE AS A SCHOOL NURSE WITHOUT AN ENDORSEMENT. (INFORMATION/DISCUSSION/FOR POSSIBLE ACTION).

President Rozar announced Public Workshop R151-26 at 9:51 a.m. The Commission considered a regulation relating to educational personnel; revising the qualifications for an endorsement to serve as a school nurse; revising the requirements for a person to serve as a school nurse without an endorsement under certain circumstances; and providing other matters relating thereto. This regulation will comply with AB49 (2025) allowing a public school employer to hire a school nurse without an endorsement. The Commission may approve or not approve moving this regulation to a Public Hearing. President Rozar noted public comment was submitted on this item by Ms. Adkins.

Dr. Nygaard explained that the Nevada Department of Education convened a stakeholder workgroup, comprised of school nurses, district nursing directors, higher education institutions, and the State Board of Nursing, to modernize Nevada's school nurse licensing framework. The draft regulation aimed to address ongoing healthcare staffing shortages and comply with AB49 by establishing a dual-pronged structure:

- NAC 391.305: Updated baseline qualifications for a standard school nurse endorsement, blending formal education and clinical experience.
- NAC 391.307: Created a pending application provisional pathway mandated by AB 49 to provide immediate district hiring flexibility while maintaining student health safeguards.

Commissioner Schultz asked about experience requirement raised in Ms. Adkins public comments. Dr. Nygaard clarified that under the revised draft:

- Candidates holding a bachelor's degree in school nursing had their one-year experience requirement completely removed.
- Candidates holding a bachelor's degree in another field while licensed as a Registered Nurse were required to complete two years of relevant experience.

President Rozar asked the Commission if there were any questions or discussions. There were no further questions or discussions; President Rozar entertained a motion to move regulation 151-26 to a Public Hearing.

Motion: Commissioner Hollowood moved to move regulation 151-26 to a Public Hearing. Vice President Collier seconded the motion. Motion carried unanimously.

11. PUBLIC WORKSHOP R127-26 TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.111 – LICENSE TO TEACH MIDDLE SCHOOL OR JUNIOR HIGH SCHOOL EDUCATION: QUALIFICATION; REQUIREMENTS AND RECOGNIZED SUBJECTS FOR ENDORSEMENT; EXCEPTION, NAC 391.120 – QUALIFICATIONS FOR LICENSE; QUALIFICATIONS FOR LICENSE WITH ENDORSEMENT IN CAREER AND TECHNICAL EDUCATION, AND NAC 391.425 – BUSINESS AND INDUSTRY ENDORSEMENT: QUALIFICATIONS FOR RECEIPT AND FIRST RENEWAL. (INFORMATION/DISCUSSION/FOR POSSIBLE ACTION).

President Rozar announced Public Workshop R127-26 at 9:56 a.m. The Commission considered a regulation relating to educational personnel; revising the subjects recognized for an endorsement to teach middle school or junior high school education; revising the requirements for the issuance of a secondary license with an endorsement in career and technical education; revising the requirements for renewing certain business and industry endorsements; and providing other matters properly relating thereto. This regulation will remove the middle school computer science endorsement, remove 6 semester credits required to renew a Career and

Technical Education (CTE) or Business and Industry (B&I) license, and other conforming language. The Commission may approve or not approve moving this regulation to a Public Hearing.

Director Briske presented the intent of the regulation, explaining that it would streamline requirements by removing six of the twelve credits previously required to renew CTE or B&I licenses, specifically courses in career development, work-based learning, and student organizations, because standard secondary teachers were not required to take them. He noted this alignment aimed to improve teacher attraction and retention. Additionally, the regulation included conforming language to reduce renewal credits for ethnic music, dance, and musical instrument repair. The middle school computer science endorsement was removed because existing secondary and advanced computer science endorsements already covered that grade level.

Commissioner Schultz questioned whether removing the six credits would compromise CTE instruction. Director Briske and President Rozar, speaking in her capacity as a CTE principal, clarified that the removal would not negatively affect teachers or instruction. They explained that educators already received that material in other formats, and the extra requirement had previously caused unnecessary friction by forcing teachers to repeat training for duties they routinely performed.

Commission Sadler asked how the change would affect individuals currently completing those credit requirements. Director Briske outlined the remaining steps, public hearing and Legislative Commission approval, and stated that if passed, the licensing department would retroactively remove the requirements from existing license holders. Following a clarification from Commissioner Schultz, Director Briske confirmed that new applicants would still need to follow current rules until the new regulation became law.

President Rozar asked the Commission if there were any further questions or discussions, there were none and she entertained a motion to move regulation 127-26 to a Public Hearing.

Motion: Vice President Collier moved to move regulation 127-26 to a Public Hearing. President Rozar seconded the motion. Motion carried unanimously.

12. PUBLIC WORKSHOP R124-26 TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.XXX & R119-22 – CONFORMING LANGUAGE FOR NAC 391.111 AND NAC 391.1301 – COMPREHENSIVE MAJORS AND MINORS RECOGNIZED BY COMMISSION. (*INFORMATION, DISCUSSION/FOR POSSIBLE ACTION*).

President Rozar announced Public Workshop R124-26 at 10:02 a.m. The Commission considered a regulation relating to educational personnel; revising provisions relating to an endorsement in recognized fields of specialization or areas of concentration for secondary education; and providing other matters properly relating thereto. This regulation will expand pathways for teaching in a secondary Career and Technical Education classroom. The Commission may approve or not approve moving this regulation to a Public Hearing.

Director Briske explained that by removing the phrase, “in academic education” from subsection 1 of section 1, the regulation would allow current secondary teachers, such as those teaching mathematics or science, to obtain a CTE license by passing the appropriate subject matter exam. He noted that CTE positions are traditionally difficult to fill because industry professionals often face substantial pay cuts to transition into teaching. Enabling existing licensed teachers to demonstrate proficiency via subject area examinations would help address those staffing shortages.

President Rozar asked the Commission if there were any questions or discussions, hearing none she entertained a motion to move regulation 124-26 to a Public Hearing.

Motion: Vice President Collier moved to move regulation 124-26 to a Public Hearing. President Rozar seconded the motion. Motion carried unanimously.

13. PUBLIC WORKSHOP R159-26 TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.055 – PROVISIONAL 1-YEAR LICENSURE OR ENDORSEMENT OF PERSON WHO HOLDS RENEWABLE LICENSE ISSUED IN THIS STATE, NAC 391.056 AS AMENDED BY R063-23 – PROVISINAL NONRENEWABLE LICENSURE: QUALIFICATION; TERM OF VALIDITY; ADDITION OF ENDORSEMENTS, NAC 391.180 AS AMENDED BY R120-22 – ENDORSEMENT AS A SCHOOL COUNSELOR, AND AUTHORIZATION TO SERVE AS A SCHOOL COUNSELOR WITHOUT ENDORSEMENT, NAC 391.185 – QUALIFICATIONS FOR ENDORSEMENT AS A SCHOOL COUNSELOR, AND NAC 391.187 – PROVISIONAL LICENSE AS A SCHOOL COUNSELOR. (*INFORMATION/DISCUSSION/FOR POSSIBLE ACTION*).

President Rozar announced Public Workshop R159-26 at 10:04 a.m. The Commission considered a regulation with the intent to comply with Assembly Bill 49 and Senate Bill 277 (2025) allowing a person who is enrolled in a program for school counseling to complete their internship while working in a school. The Commission may approve or not approve moving this regulation to a Public Hearing.

Jackie Nygaard, Education Programs Professional, with the Department, presented regulation 159-26 to the Commission explaining that during the drafting, the Department consulted with school counseling associations, educator preparation institutions, school districts and practicing school counselors including Commission Schultz. The primary objective was to modernize the current framework to align with contemporary national clinical standards, address ongoing staff shortages, and comply with legislation passed during the 2025 legislative session.

Specifically, this regulation would bring Chapter 391 into compliance with Assembly Bill (AB) 49 and Senate Bill (SB) 277. The joint goal has been to expand student access to qualified, supportive school counseling professionals while maintaining current, rigorous standards to best serve our districts, schools, and students.

To achieve this, the proposed regulation removes counseling from 2 regulations because those create unnecessary redundancy, and then NAC 391.180 (amended), modernizes the baseline qualifications for a standard school counselor endorsement to align with the national standards of the Council for Accreditation of Counseling and Related Educational Programs (CACREP) and the American School Counselor Association (ASCA). It defines a rigorous 48-semester-hour graduate credit curriculum across eight core counselor training areas and establishes a minimum of 600 hours of supervised, school-based clinical experience. It also maintains professional development requirements for renewal, emphasizing ethics, evidence-based suicide prevention, and cultural competency.

NAC 391.187 (Amended) implements the provisional pathways mandated by SB 277 and AB 49. It creates a formal Provisional License as a School Counselor, authorizing graduate students who are actively enrolled in an accredited school counseling programs to complete their required clinical internship hours on the job. Working in a school counselor role while completing an internship carries unique clinical responsibilities, this regulation inserts crucial safeguards. This framework successfully balances expanding opportunities with the high professional standards and clinical oversight required to support school counseling of Nevada's students.

Commissioner Schultz, noting her board membership with the Nevada School Counselor Association (NVSCA), expressed concerns regarding the supervision of school counselor interns. She highlighted that interns serving in elementary or rural schools are often the sole counselors on site. Given the sensitive nature of school counseling work, she questioned who would be qualified to supervise these solo interns and asked if additional safeguards could be added to the regulation to protect them. Dr. Nygaard acknowledged the concern, pointing out that the proposed bill required ‘direct and ongoing supervision’ by a fully endorsed school counselor under NAC 391.180. He suggested that a formal definition addressing these concerns could potentially be added. Reviewing the regulation text, Dr. Nygaard outlined existing safeguards, which required interns to maintain regular consultation with their graduate program representatives and prohibited them from serving as primary signatories or sole evaluators for formal mental health risk or threat assessments. He noted that interns could only participate in mental health risk assessments as part of a multidisciplinary team under direct supervision, though he acknowledged additional safeguards could be incorporated if necessary.

Director Briske explained that regulations must balance being prescriptive without becoming overly restrictive. He noted that defining “direct supervision” as requiring a physical, on-site presence would mandate school districts to provide on-site supervisors, a requirement that rural districts might find impossible to meet. Consequently, the work group intentionally left “direct supervision” broadly defined to allow for remote methods, such as Zoom calls.

President Rozar asked the Commission if there were any further questions or discussions, seeing none she entertained a motion to move regulation 159-26 to a Public Hearing.

Motion: Vice President Collier moved to move regulation 159-26 to a Public Hearing. President Rozar seconded the motion. Commissioner Schultz abstained. Motion carried.

14. PUBLIC WORKSHOP T001-26 TO SOLICIT COMMENTS ON PROPOSED AMENDMENTS TO NAC CHAPTER 391.XXX – AUTHORIZATION TO SERVE WITHOUT AN ENDORSEMENT AS A SCHOOL SOCIAL WORKER AND NAC 391.320 – ENDORSEMENT TO SERVE AS A SCHOOL SOCIAL WORKER. (INFORMATION/DISCUSSION/FOR POSSIBLE ACTION).

President Rozar announced Public Workshop T002-26 at 10:12 a.m. The Commission considered a temporary regulation to comply with AB 49 (2025) allowing an employer to hire a person to provide services as a school social worker pending Department licensure, and SB 277 allowing a person who is enrolled in a program for school social work to complete their internship while working in a school. The Commission may approve or not approve moving this regulation to a Public Hearing.

Dr. Nygaard detailed that earlier this year the Department convened a dedicated stakeholder workgroup including representation from the state board of examiners for social workers, NDE, school districts, school social workers, and NSHE social work programs with the purpose of revising Chapter 391. The Department’s current framework needed modernization to align with contemporary national standards, directly address Nevada’s ongoing educator shortages, and comply with recent legislation. This regulation will comply with two critical pieces of legislation passed during the 2025 legislative session: AB 49 and SB 277. The Department’s goal with these revised regulations is to expand student access to quality mental health and support services while maintaining rigorous clinical safeguards to protect our districts, schools, and students. to achieve this, the Department is proposing a dual-pronged regulatory structure:

- NAC 391.320 (Amended): This section updates the baseline qualifications for a standard endorsement to align with the Council on Social Work Education (CSWE) accreditation standards. It also establishes a provisional endorsement pathway in compliance with SB 277. This allows graduate-level social work interns to complete their required clinical hours on the job under strict state safeguards—including ongoing supervision, a formal Memorandum of Agreement (MOA), and an explicit prohibition against conducting high-liability mental health risk assessments.
- NAC 391.XXX (New Section): This proposed new section implements AB 49 by creating a temporary, one-year authorization pathway. It allows school districts and charter schools to immediately hire fully State Board-licensed social workers while their Department of Education educator endorsement applications are pending, preventing administrative delays from keeping qualified professionals out of our schools.

This framework balances workforce expansion with essential professional rigor and oversight to best serve Nevada's students.

President Rozar opened the floor for questions and discussions from the Commission and acknowledgment of a public comment on the agenda item. Commissioner Schultz inquired whether the updated regulation eliminated the master's degree requirement for school social workers or if that standard remained in place. Dr. Nygaard explained that the proposed framework created a pathway for bachelor's level social workers alongside master's level positions. He noted that this addition had been extensively discussed within the stakeholder workgroup to address critical staffing shortages in areas of Nevada struggling to recruit master's degree holders. He emphasized that according to the State Board of Examiner's scope of practice, the operational capabilities of a bachelor's level licensed social worker (LSW) and master's level social worker (MSW) are identical.

Recognizing that the proposal required further refinement, the Commission considered how to proceed procedurally. Director Briske advised that the Commission could either update the regulatory language and conduct another public workshop prior to holding a formal public hearing, or update the language and move straight to the public hearing, noting that the choice primarily impacted the timeline.

Further discussion focused on potential operational differences between the qualification levels. In response to a follow-up question regarding public comments on reporting capabilities, Dr. Nygaard clarified that the primary legal distinction lies between standard social workers (whether BSW or MSW) and Licensed Clinical Social Workers (LCSWs). While LCSWs are authorized to perform high-level clinical duties, the scope of practice between a BSW and an MSW remains equivalent under state standards.

To ensure informed decision-making, Commissioner Babina requested that the Department evaluate nationwide trends and requirements in other states prior to taking action. Concurring with the need for additional research and language alignment, the Commission decided to postpone the vote.

President Rozar entertained a motion to table the temporary regulation T001-26 until a future meeting to allow for further data on other states, in addition to alignment of the regulation language.

Motion: Commissioner Schultz moved to table temporary regulation 001-26 for a future meeting pending additional data and alignment of regulation language. Commissioner DeWeerd seconded the motion. Motion carried unanimously.

15. EXECUTIVE ORDER 26-3 (INFORMATION/DISCUSSION).

Amelia Thibault explained Executive Order 26-03, introduced on August 17, 2026, echoed the earlier guidance of Executive Order 23-03 while adopting a slightly different approach. The Department met with the Commission on Professional Standards in Education, State Board of Education, and other entities to invite public and stakeholder feedback regarding education regulations under their jurisdiction. She highlighted several key details:

- **Scope of Feedback:** The request aimed beyond regulation removal, asking for input on amending, clarifying, and updating definitions across entire chapters to ensure regulations remained strong, reliable, and clear.
- **Nevada Administrative Code (NAC) Index Updates:** To aid stakeholders, the Department issued Guidance Memo 26-16 with an attached updated NAC index. Because the online version maintained by the Legislative Council Bureau (LCB) did not yet reflect every recently enacted, enforceable regulation, the index cross-referenced these items by their LCB file numbers. This allowed stakeholders to confirm whether a regulation had already been modified or was currently in the drafting process before submitting feedback.
- **Submission Timeline and Next Steps:** Public feedback and recommendations could be submitted via email through October 29, 2026. Following that deadline, the Department planned to analyze and sort the feedback by jurisdiction, returning to present the compiled recommendations at a November or December meeting before filing the final report with the Governor's Office.

Following Ms. Thibault presentation, there were no questions from the Commission and President Rozar closed the floor on agenda item #15.

16. CONFERENCE ATTENDANCE FOR JANUARY NATIONAL ASSOCIATION OF STATE DIRECTORS OF TEACHER EDUCATION AND CERTIFICATION (NASDTEC) MEETING. (INFORMATION/DISCUSSION/FOR POSSIBLE ACTION).

President Rozar opened this agenda item and explained the per Department Travel Policy, Commission members must have approval from the Commission to send members to conferences. The Commission may approve or not approve sending Commission members to the National Association of State Directors of Teacher Education and Certification (NASDTEC) January and June conferences. Director Briske requested approval for the Commission President and Vice President to attend the upcoming NASDTEC and Professional Educator Standards Board Association (PESBA) conferences, contingent upon budget availability. He noted that the January conference would take place in New Orleans, LA, followed by the June conference in Anaheim, CA.

President Rozar and Vice President Collier both announced that they are available to attend both conferences and both will abstain from voting. President Rozar entertained a motion to approve sending both President and Vice President of the Commission to the NASDTEC January and June conferences pending available funding.

Motion: Commissioner Schultz moved to approve the attendance of the President and Vice President for both NASDTEC and PESBA conferences in January and June pending available funding. Commissioner DeWeerd seconded the motion. President Rozar and Vice President Collier abstained. Motion carried.

17. FUTURE AGENDA ITEMS (INFORMATION/DISCUSSION)

Discussions, Workshops and Public Hearings
There were no additional future agenda items.

18. PUBLIC COMMENT #2

There were no public comments in Carson City or Las Vegas.

19. ADJOURNMENT

President Rozar acknowledged the next Commission on Professional Standards meeting on November 18, 2026, and adjourned the meeting at 10:33 am.

APPENDIX A: STATEMENT GIVEN DURING PUBLIC COMMENT

1. Ms. Anna Adkins, Director of Government Relations, Clark County School District (CCSD) provided public comment in Las Vegas on the following agenda items:
 - Agenda Item #8, R013-26, Science of Reading Licensure Requirement *(A summary of the statement is available in Appendix A1).*
 - Agenda Item #10, R151-26, Endorsement to serve as a school nurse *(A summary of the statement is available in Appendix A2).*
 - Agenda Item #14, T002-26, Authorization to serve without an endorsement as a school social worker. *(A summary of all the statements are available in Appendix A3).*
2. Mr. Evan Fakhreddine, Neuro Thrive, provided a written public comment on Agenda Item #7, R102-25, Endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant. *(A summary of the statement is available in Appendix A4).*
3. Ms. Kristen Neville, Manager State Affairs, American Occupational Therapy Association, provided a written public comment on Agenda Item #7, R102-25, Endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant. *(A summary of the statement is available in Appendix A5).*
4. Mr. Matt Olivier, Nevada Occupational Therapy Association, provided a written public comment regarding agenda item #7, R102-25, Endorsement to provide services to pupils as an occupational therapist and occupational therapy assistants. *(A summary of the statement is available in Appendix A6).*
5. Ms. Elise Johnson, Board Member, Nevada School Counselor Association, provided a written public comment regarding agenda item #13, R159-26, To allow a person who is enrolled in a program for school counseling to complete their internship while working in a school. *(A summary of the statement is available in Appendix A7).*

ITEM A1: ANNA ADKINS, DIRECTOR OF GOVERNMENT RELATIONS, CLARK COUNTY SCHOOL DISTRICT

Summary of Public Comment:

Provided public comment regarding Regulation 013-26, Science of Reading Licensure Requirement.

Good morning, President Rozar and members of the Commission. For the record, my name is Ana Adkins. I serve as the Director of Government Relations for the Clark County School District.

I am here in opposition of Regulation 013-26, specifically the requirement that the foundational literacy course apply to teachers renewing an existing license.

We support the intent of this regulation and agree that new early childhood and elementary teachers should receive training in foundational literacy skills aligned with the science of reading. For new applicants beginning July 2028, requiring this coursework as part of their teacher preparation makes sense. It establishes a common foundation before educators enter the classroom.

Our concern is with applying the same 45-hour coursework requirement to experienced teachers who are renewing their licenses.

The Clark County School District has already made a significant investment in preparing our elementary teachers to implement the science of reading. A majority of our elementary teachers have completed LETRS, which includes approximately 168 hours of professional learning focused on evidence-based literacy instruction. This is substantially more than the 45 hours contemplated by the proposed regulation.

For a teacher who has already completed LETRS, requiring an additional 45-hour course creates unnecessary duplication without providing a corresponding benefit to the teacher or the students they serve. We believe the regulation should recognize high-quality, approved professional learning that teachers have already completed.

We also want to ensure that teachers who completed LETRS hours for license renewal prior to July 1, 2028, receive appropriate credit for that coursework. Those hours should be documented and applied toward the foundational literacy requirement rather than requiring teachers to complete additional coursework to satisfy a requirement they have already effectively met.

There is also an important consideration for our pre-kindergarten educators. A majority of CCSD pre-kindergarten teachers have completed LETRS for Pre-K, which provides approximately 30 hours of literacy-focused professional learning. If pre-kindergarten teachers are included within the definition of early childhood teachers subject to this renewal requirement, that training should be recognized and applied toward the required 45 hours.

We believe the state can accomplish the goal of ensuring educators have strong foundational literacy preparation without creating unnecessary barriers for experienced teachers who have already completed substantial, relevant professional development.

Thank you for your time and consideration.

ITEM A2: ANNA ADKINS, DIRECTOR OF GOVERNMENT RELATIONS, CLARK COUNTY SCHOOL DISTRICT

Summary of Public Comment:

Provided public comment regarding Regulation 151-26, Endorsement to serve as a school nurse.

Good morning, President Rozar and members of the Commission. For the record, my name is Ana Adkins. I serve as the Director of Government Relations for the Clark County School District. I am here in opposition of Regulation 151-26.

We believe the education and experience requirements for a school nurse should better reflect the specialized clinical responsibilities of the position.

First, we have concerns with allowing an individual to qualify for a school nurse endorsement with a bachelor's degree in any field, rather than requiring a Bachelor of Science in Nursing. School nurses are responsible for addressing a wide range of student health needs, including managing chronic health conditions, administering medications, responding to emergencies, supporting students with disabilities, and coordinating care with families and medical providers. These responsibilities require a strong foundation in nursing education and clinical practice.

For that reason, we believe a Bachelor of Science in Nursing should be the appropriate educational standard for school nurses. Requiring a BSN provides greater assurance that individuals entering school nursing have received comprehensive preparation specifically related to nursing practice.

We also believe the experience requirement should allow for greater flexibility. We support establishing a reasonable experience threshold, but we do not believe the regulation should prevent a school district or charter school from hiring an exceptional candidate simply because that individual has less than one year of experience.

School districts need the ability to evaluate candidates based on their education, clinical skills, qualifications and demonstrated ability to serve students. If a candidate is otherwise highly qualified and a district determines that the individual is capable of successfully performing the duties of a school nurse, the district should have some discretion to hire that individual.

We believe these changes would strike a better balance between maintaining high professional standards and giving school districts the flexibility they need to recruit qualified school nurses in a competitive workforce environment.

Thank you for your time and consideration.

ITEM A3: ANNA ADKINS, DIRECTOR OF GOVERNMENT RELATION, CLARK COUNTY SCHOOL DISTRICT

Summary of Public Comment:

Provided public comment regarding Temporary Regulation T001-26, Regulation that authorizes to serve without an endorsement as a school social worker.

Good morning, President Rozar and members of the Commission. For the record, my name is Ana Adkins. I serve as the Director of Government Relations for the Clark County School District. I am here in opposition of T001-26.

We are opposing T001-26 particularly because of the provision that would allow a bachelor's degree to satisfy the educational requirements for a school social work endorsement.

School social work is a specialized profession that requires more than a general understanding of social services. School social workers address complex student needs, including mental health, behavioral concerns, family circumstances, crisis intervention, and barriers that can directly affect a student's ability to succeed in school. These responsibilities require specialized graduate-level preparation.

The National School Social Work Association identifies a master's degree in social work as the recommended entry-level qualification for school social workers. The national standard recognizes that school social work is a distinct specialty within the social work profession and requires specialized knowledge of both social work practice and educational systems.

We are concerned that allowing bachelor's-level candidates to serve in school social worker positions would diminish that professional standard and could affect the quality and scope of services available to the students.

There are also practical implications for student services. Bachelor-level social workers have limitations on the services they can provide, including certain mental health assessments and interventions. In a school setting, those limitations can affect intervention fidelity, the ability to respond to student needs, and, where applicable, access to Medicaid-reimbursable services.

We also believe this creates an inequity among school-based professionals. School psychologists and school counselors are required to have advanced degrees because of the specialized nature of the services they provide. School social workers should be placed on a separate, lower educational track when they are providing similarly critical mental and behavioral health support to students.

This is not simply an issue of job title or credentialing. This is also about ensuring that the professionals responsible for providing these services have the appropriate level or preparation to do the work safely and effectively.

We also believe Nevada should address the underlying workforce issue rather than lowering the qualification standard. In Clark County, there are qualified Licensed Master Social Workers who could fill these positions but the funding and prioritization of school social worker positions within district budgets remain significant challenges.

We support the efforts to expand the school social worker pipeline and provide opportunities for qualified candidates to complete their training. However, we believe those efforts should maintain the graduate-level standard expected of the profession.

Thank you for your time and consideration.

ITEM A4: EVAN FAKHREDDINE, NEURO THRIVE

Summary of Public Comment:

Provided written public comment regarding regulation 102-25, regulation for an endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant.

To the Commission on Professional Standards in Education,

I am writing to submit a public comment in opposition to LCB File No. R102-25, which would add a degree requirement (in addition to state licensure) as a condition of receiving a school-based endorsement to provide OT, PT, OTA, and PTA services to pupils.

I am a practicing Occupational Therapist and co-owner of a home-health OT/ABA practice in Las Vegas, and I also work within the largest Nevada school system. I would be personally unaffected by this change, as I hold my license, my master's degree, and would be grandfathered in under Section 5. My opposition is not self-interested — it is based on concern for the profession and the state's ability to recruit and retain therapists in schools going forward.

My core objection is that this requirement is redundant. Licensure by the Board of Occupational Therapy and the Nevada Physical Therapy Board already requires a qualifying accredited degree as a prerequisite to sit for licensure. Layering a separate degree requirement on top of an existing license does not add a meaningful new safeguard — it duplicates a standard the license already enforces.

Beyond redundancy, I am concerned about the practical effect on workforce supply. Nevada already faces real challenges attracting and retaining OT/PT professionals, particularly in school-based settings. These professionals frequently carry substantial educational debt — often exceeding \$100,000 — accumulated in pursuit of the very degrees required for licensure. Even without a new fee attached to this regulation, adding another layer of documentation and administrative verification on top of existing licensing requirements adds friction to an already burdened credentialing process, at a time when the state should be looking for ways to make school-based roles more attractive, not less.

I respectfully urge the Commission to reconsider this addition and to weigh the redundant compliance burden against the state's stated interest in expanding access to school-based therapy services.

Thank you for your consideration.

**ITEM A5: KRISTEN NEVILLE, MANAGER, STATE AFFAIRS, AMERICAN
OCCUPATIONAL THERAPY ASSOCIATION**

Summary of Public Comment:

Provided written public comment regarding regulation 102-25, regulation for an endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant.

The American Occupational Therapy Association (AOTA) is the national professional association representing the interests of more than 213,000 occupational therapists, occupational therapy assistants, and students of occupational therapy, including 332 members in Nevada. The practice of occupational therapy is science-driven, evidence-based, and enables people of all ages to live life to its fullest by promoting health and minimizing the functional effects of illness, injury, and disability. AOTA supports the Commission on Professional Standards in Education (COPS) in its mission to protect the health, safety, and welfare of Nevada consumers and the authority of the Board to create regulations to achieve this mission.

On behalf of AOTA, I am writing to express our gratitude for hearing our concerns and those expressed by the Nevada Occupational Therapy Association (NVOTA) regarding a previous version of this regulation proposal. The previous version would have prevented occupational therapists (OTs) licensed with a bachelor's degree from providing services in Nevada schools. These are OTs who earned their license before the minimum degree requirement was changed to a master's degree in 2007. Despite the change happening almost 20 years ago, there are still many OTs practicing today under a license earned with a bachelor's degree. The updated version before you today addresses our concerns. We very much appreciate your collaboration on getting the language of the regulation correct such that it allows OT practitioners to provide needed services to children in Nevada schools.

Thank you for the opportunity to comment on the proposed changes, and if it would be helpful, we could be available at a future meeting to discuss our proposal. Please contact me at kneville@aota.org or 240-800-5981 if you have questions or need additional information about AOTA's position.

ITEM A6: MATT OLIVIER, NEVADA OCCUPATIONAL THERAPY ASSOCIATION

Summary of Public Comment:

Provided written public comment regarding regulation 102-25, regulation for an endorsement to provide services to pupils as an occupational therapist and occupational therapy assistant.

On behalf of the Nevada Occupational Therapy Association (NVOTA), we would like to thank the Commission on Professional Standards in Education and Director Briske for the opportunity to provide public comment and, more importantly, for the responsiveness and collaboration demonstrated throughout this process.

NVOTA was notified of proposed changes affecting the requirements for occupational therapy and physical therapy practitioners working in Nevada schools. When concerns were raised regarding language that did not accurately reflect the licensed professionals practicing in our state, those concerns were heard. Specifically, we value occupational and physical therapists with a bachelor's degree or higher, and occupational and physical therapy assistants with an associate's degree or higher. Their knowledge, experience, and expertise are significant in supporting Nevada students participate and access their education. We sincerely appreciate the Commission's decision to table the discussion to allow time for additional dialogue and consideration rather than moving forward without addressing the concerns of the professions affected.

We are especially grateful to Director Briske and the Nevada Department of Education for their communication and willingness to work with stakeholders toward language that more accurately reflects occupational therapy and physical therapy practice in Nevada. We also appreciate our physical therapy colleagues, school-based occupational therapy and physical therapy professionals, the American Occupational Therapy Association, advocates, and advocacy teams who contributed their expertise and perspectives throughout this process.

NVOTA values a regulatory process in which practitioners affected by changes to requirements, policies, and regulations have an opportunity to be heard. The responsiveness demonstrated throughout this process is an excellent example of what can happen when regulators, professional organizations, practitioners, and advocates work collaboratively.

Thank you to Director Briske, the Department, and the members of the Commission for your time, consideration, and continued support of Nevada's school-based professionals and the students they serve.

ITEM A7: ELISE JOHNSON, BOARD MEMBER, NEVADA SCHOOL COUNSELOR ASSOCIATION

Summary of Public Comment:

Provided written public comment regarding regulation 159-26, regulation that would allow a person who is enrolled in a program for school counseling to complete their internship while working in a school.

Chair and Members of the Commission,

*On behalf of the **Nevada School Counselor Association (NvSCA)**, thank you for the opportunity to provide comments regarding proposed regulation R159-26. NvSCA appreciates the Commission's efforts to address Nevada's School Counselor workforce shortages while maintaining high standards for student support services and professional preparation. The proposed regulation creates a pathway for school counseling interns to complete their internships while employed in schools and updates school counselor endorsement requirements.*

Support for Workforce Development and Updated Endorsement Requirements

*NvSCA supports efforts to increase the number of qualified school counselors serving Nevada students. School counselor shortages continue to challenge schools across the state, and we recognize the need for innovative approaches that strengthen the pipeline of future professionals. We also strongly support the proposed revisions to school counselor endorsement requirements, as they align with nationally recognized standards, including those of the **Council for Accreditation of Counseling and Related Educational Programs (CACREP)** and the **American School Counselor Association (ASCA)**. These updates help ensure that Nevada school counselors receive preparation consistent with national expectations for the profession.*

Concerns Regarding Intern Supervision

While NvSCA supports the creation of a provisional pathway for school counseling interns, we have concerns regarding the supervision requirements outlined in the proposed regulation. School counselors routinely engage in crisis response, suicide risk assessments, threat assessments, child abuse reporting, safety planning, and complex ethical decision-making. These responsibilities require immediate access to experienced professional supervision.

The proposed regulation requires direct and ongoing supervision by a fully endorsed school counselor. However, NvSCA recommends that the regulation further specify that supervisors:

- Hold a current Nevada school counselor license or endorsement;*
- Possess successful experience practicing as a school counselor; and*

- *Be assigned to the same school site or building as the intern.*

Direct onsite supervision is essential to protect students, support intern development, and reduce potential liability for school districts and university preparation programs.

Supervision provided primarily through virtual communication or by a counselor located at another campus may not provide the level of oversight necessary when interns encounter high-risk student situations.

Recommendations for Implementation

As Nevada implements strategies to address workforce shortages, NvSCA encourages the Nevada Department of Education and local education agencies to:

- 1. Maintain rigorous standards for school counselor licensure and endorsement.*
- 2. Ensure alternative pathways recognize the specialized nature of school counseling.*
- 3. Provide appropriate supervision, mentoring, and professional development for provisionally endorsed personnel.*
- 4. Ensure students and families have access to appropriately qualified school counseling professionals.*
- 5. Monitor implementation to ensure staffing solutions do not result in unqualified personnel serving in specialized student-support roles.*

Conclusion

NvSCA supports the proposed pathway for increasing the school counselor workforce and the updated endorsement requirements that align with national preparation standards. At the same time, we urge the Commission to strengthen supervision requirements by requiring that school counseling interns be supervised by a currently licensed and experienced school counselor working at the same site.

These safeguards will help ensure student safety, provide meaningful professional development for future school counselors, maintain the integrity of the profession, and support Nevada's efforts to address workforce shortages responsibly.

Thank you for your consideration and for your commitment to ensuring that Nevada students have access to high-quality school counseling services.