PETITION FOR NEVADA EDUCATOR LICENSURE REFORM

Submitted pursuant to NRS 233B.100

To: Nevada Commission on Professional Standards in Education
From: Lakesha Harden, Nevada Educator
Re: Petition to amend educator-licensure regulations and recommend statutory reforms concerning competency testing, coursework, professional experience, provisional-license provisions, and transcript evaluations
Date: August 21, 2026

I. PURPOSE OF PETITION

Pursuant to NRS 233B.100, I respectfully petition the Nevada Commission on Professional Standards in Education to review and amend the regulations governing educator licensure in Nevada.

I request that the Commission consider reforms designed to make Nevada's educator-licensure system more competency-based, transparent, consistent, and accessible to qualified educators while maintaining appropriate professional standards.

Specifically, I request consideration of reforms concerning basic-skills standardized testing; use of qualifying college coursework as an alternative to standardized testing; recognition of previously completed coursework; recognition of older qualifying coursework; minimum grades for coursework submitted for licensure; recognition of documented professional teaching experience; alternative competency pathways for specialized and elective educators; clear treatment of provisions placed on provisional licenses; protection and clarification of provision deadlines; review and correction of inaccurate transcript and coursework evaluations; and referral to the Nevada Legislature of reforms requiring statutory amendments.

II. STATEMENT OF THE PROBLEM

Nevada's educator-licensure system should determine whether an educator is qualified to teach based on demonstrated knowledge, preparation, training, and professional competency.

However, educators may encounter situations in which they are required to demonstrate the same competency through multiple methods, repeat coursework for which they have already earned academic credit, or complete coursework before a deadline that was previously assigned to them.

These requirements can create unnecessary financial and administrative barriers for educators who are already qualified, experienced, and working in Nevada schools.

The purpose of this petition is not to eliminate professional standards. Rather, the purpose is to ensure that Nevada's licensing system recognizes competency that an educator has already demonstrated and does not unnecessarily require educators to repeat the same demonstration of competency.

III. BASIC-SKILLS TESTING FOR SPECIALIZED AND ELECTIVE EDUCATORS

Nevada should reconsider the application of basic reading, writing, and mathematics standardized examinations to educators seeking licenses limited to specialized or elective instructional fields, including music, art, theater, dance, physical education, and other specialized instructional areas.

A teacher seeking a specialized music license, for example, is primarily being licensed to teach music. That educator should be evaluated on the competencies necessary to teach music, including

subject-matter knowledge and the ability to teach the subject effectively.

I respectfully request that the Commission consider regulations establishing an alternative pathway by which an applicant for a specialized or elective license may demonstrate basic academic competency through approved coursework, an accredited degree, documented professional experience, or another NDE-approved competency measure.

Where existing Nevada statutes require testing, I respectfully request that the Commission recommend the appropriate statutory amendment to the Nevada Legislature.

IV. NO DUPLICATE DEMONSTRATION OF COMPETENCY

An educator who has already demonstrated competency through qualifying college coursework should not ordinarily be required to demonstrate the same competency again through a standardized examination.

Nevada has already recognized the principle that qualifying coursework can serve as an alternative to certain basic-skills testing.

I therefore request that Nevada expand this principle so that qualifying coursework may satisfy applicable basic-skills competency requirements without requiring the educator to pass a redundant standardized examination. The system should favor one reliable demonstration of competency over multiple duplicative demonstrations.

V. RECOGNITION OF PREVIOUSLY COMPLETED COURSEWORK

An educator should not be required to repeat qualifying college coursework for which the educator has already earned academic credit.

I request that Nevada establish a clear rule providing that an educator who has successfully completed qualifying coursework at an accredited institution shall receive consideration for that coursework toward the applicable licensure requirement when the course satisfies the required subject matter and credit-hour requirements.

An educator should not be required to repeat coursework merely because the educator's previous license expired, the educator is applying for a different license or base license, the educator previously held the course as a provision, the course was completed several years earlier, or the Department previously evaluated the educator's record incorrectly.

If NDE determines that previously completed coursework does not satisfy a requirement, the educator should receive a written explanation identifying the specific reason the course does not qualify.

VI. COURSEWORK SHOULD NOT AUTOMATICALLY EXPIRE

Qualifying college coursework should not automatically become invalid solely because time has passed.

I request that Nevada permit educators to submit qualifying coursework regardless of the date it was completed unless a specific statute or regulation establishes a legitimate recency requirement for that particular subject.

A course in mathematics, music theory, music methods, conducting, or another academic subject does not necessarily become invalid merely because the course was completed several years earlier. Where current knowledge genuinely matters, Nevada should identify those specific areas rather than applying a blanket expiration period to otherwise qualifying coursework.

VII. MINIMUM GRADE FOR COURSEWORK

I request that Nevada consider establishing C- or better as the minimum grade for coursework submitted toward educator licensure, unless a specific licensure program or statute establishes a different standard.

An educator who has successfully completed an accredited college course with a C- or better should be permitted to submit the course for consideration. The Department should evaluate course content, credit hours, institution, grade, and relevance to the licensing requirement.

A course should not automatically be rejected solely because the grade is below a B when the institution recognizes the course as successfully completed and the course otherwise meets the applicable requirements. If Nevada determines that a higher grade is necessary for a particular requirement, that requirement should be clearly identified in regulation.

VIII. RECOGNITION OF PROFESSIONAL TEACHING EXPERIENCE

Nevada should establish a competency-based pathway allowing documented professional K–12 teaching experience to satisfy certain coursework requirements when the educator has already demonstrated competency in the relevant area.

This should be particularly considered for specialized fields such as music. An educator who has successfully taught music and directed school ensembles may have demonstrated practical competency in music teaching methods, choral methods, instrumental methods, rehearsal techniques, conducting, ensemble management, performance preparation, and student assessment.

I am not requesting that professional experience automatically replace all academic requirements. Instead, I request an approved competency-assessment pathway through which professional experience can be evaluated and credited when it demonstrates the same competency the coursework is intended to establish.

Possible evidence could include verified teaching experience, administrator verification, employment records, evaluations, lesson plans, performance programs, recordings, portfolios, professional observations, or an NDE-approved competency assessment.

IX. SPECIALIZED MUSIC AND ELECTIVE EDUCATOR PATHWAY

Nevada should establish a clearly defined alternative pathway for specialized/elective educators.

For educators seeking licenses in areas such as music, art, theater, dance, and physical education, Nevada should consider allowing applicants to demonstrate competency through a combination of accredited degrees, relevant college coursework, subject-area examinations, successful K–12 teaching experience, professional portfolios, performance assessments, and other NDE-approved evidence.

This would allow Nevada to maintain high standards while ensuring that licensure requirements are appropriately related to the educator's actual field of instruction.

X. PROVISIONAL LICENSE PROVISIONS AND DEADLINES

Nevada should clarify what happens to individual provisions placed on a provisional license when the underlying license expires before the stated deadline for completing those provisions.

This issue is particularly important when an educator has been given a specific provision deadline extending beyond the expiration date of the license.

The regulations should clearly answer whether the original provision deadline remains valid after the license expires; whether expiration automatically accelerates the deadline; whether the educator may reapply while continuing to satisfy the provision according to the original deadline; whether the answer

changes when the educator applies for a different base license; whether the answer changes when the educator applies for a related endorsement or license; and what review or appeal process is available when NDE determines that an originally established deadline no longer applies.

Educators should not have to discover the effect of license expiration only after receiving a new application evaluation.

If a provision was assigned a deadline of 2028, the Department should clearly explain what legal authority permits that deadline to be accelerated.

XI. ACCURATE TRANSCRIPT AND COURSEWORK EVALUATIONS

Nevada should establish a formal process allowing educators to challenge and correct inaccurate transcript evaluations.

This is particularly important because an inaccurate evaluation can cause an educator to spend significant amounts of money and time repeating coursework that has already been completed.

I have personally experienced an NDE evaluation in which music ensemble coursework I had completed was identified as a deficiency. I recognize that licensing evaluations can be complex and that mistakes may occur. For that reason, the system should provide an effective mechanism for correcting mistakes.

I request that educators be permitted to submit additional transcripts; submit course descriptions and syllabi; provide documentation demonstrating course content; request reconsideration of a deficiency; request review by another qualified evaluator when appropriate; receive a written explanation when coursework is rejected; and appeal an incorrect coursework determination before being required to repeat the course.

XII. WRITTEN EXPLANATION OF LICENSURE DECISIONS

When NDE determines that previously completed coursework, experience, or another qualification does not satisfy a licensing requirement, the educator should receive a written explanation identifying the specific licensing requirement, the specific statute or regulation relied upon, why the submitted evidence does not satisfy the requirement, whether additional documentation may be submitted, whether reconsideration is available, and whether the decision may be appealed.

This would improve transparency and reduce unnecessary disputes.

XIII. POLICY BENEFITS

The proposed reforms would reduce unnecessary barriers to educator licensure; recognize demonstrated competency; reduce unnecessary duplication; prevent educators from paying to repeat coursework; improve consistency in transcript evaluations; give experienced educators additional pathways to demonstrate competency; improve transparency; reduce administrative confusion; support educator recruitment and retention; and help Nevada retain experienced educators in areas where qualified teachers are needed.

These reforms would not lower Nevada's professional standards. Instead, they would modernize the manner in which educators demonstrate that they meet those standards.

XIV. REQUEST FOR REGULATORY ACTION

Pursuant to NRS 233B.100, I respectfully request that the Commission on Professional Standards in Education review the issues raised in this petition; determine which requested reforms may be accomplished through amendments to NAC Chapter 391; initiate the appropriate regulation-making

process for reforms within the Commission's authority; identify any requested reforms that require amendments to NRS Chapter 391; recommend appropriate statutory changes to the Nevada Legislature for those reforms; consider public input from Nevada educators and other interested parties; and provide a written response to this petition explaining the Commission's decision and the reasons for that decision.

XV. REQUEST FOR PUBLIC CONSIDERATION

I respectfully request that this petition be considered as a matter of statewide educator-licensure policy rather than solely as an individual licensing dispute.

The issues described here affect the broader question of how Nevada recognizes educator competency.

Nevada should have a licensing system that is rigorous while also being fair, transparent, efficient, and responsive to the experience and education of its educators.

XVI. SUPPORTING DOCUMENTATION

I intend to provide supporting documentation demonstrating the practical issues that led to this petition, including prior Nevada educator licenses; provisional-license provisions and stated deadlines; NDE licensure evaluations; documentation concerning previously completed coursework; transcript records; evidence of K–12 music teaching experience; evidence of music ensemble and conducting experience; and relevant NDE correspondence.

Additional supporting documentation may be submitted as it becomes available.

XVII. CONCLUSION

I respectfully ask the Commission on Professional Standards in Education to consider these reforms and begin the appropriate regulatory process.

Nevada educators should not be required to repeatedly prove competencies they have already demonstrated through education, coursework, professional experience, or other reliable evidence.

The goal of this petition is not to eliminate standards. The goal is to make Nevada's standards meaningful, consistent, competency-based, and fair.

Respectfully submitted,

Lakesha Harden
Nevada Educator
Nevada