

**NEVADA DEPARTMENT OF EDUCATION  
 COMMISSION ON PROFESSIONAL STANDARDS IN  
 EDUCATION  
 WEDNESDAY APRIL 20, 9:00 AM**

Office	Address	City	Meeting Room
Department of Education	2080 E. Flamingo Rd.	Las Vegas	Room 114
Department of Education	700 E. Fifth St.	Carson City	Board Room
Department of Education	Livestream	n/a	<a href="#"><u>Link</u></a>

**SUMMARY MINUTES OF THE COPS MEETING**

**COMMISSION MEMBERS PRESENT:**

**In Las Vegas:**

Commissioner Kenny Belknap  
 Commissioner Jennifer Davis  
 Commissioner Jordan Wenger  
 Commissioner Maria Roberts

**In Carson City:**

President Aaron West-Guillen  
 Commissioner Richard Stokes  
 Commissioner Christina Tucker

**Virtually:**

None

**COMMISSION MEMBERS NOT PRESENT:**

Commissioner Jennifer Carvalho  
 Commissioner Jennifer Davis

**DEPARTMENT STAFF PRESENT:**

**In Las Vegas:**

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

**In Carson City:**

Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement.

**LEGAL STAFF PRESENT**

Deputy Attorney General David Gardner (Virtually)

**AUDIENCE IN ATTENDANCE:**

**In Las Vegas:**

Dr. Osvaldo Garcia, Clark County School District.

Grant Hanevold, Chef Education Officer for Public Education Foundation.

Laura Clewley, Clark County School District.

Michelee Crawford, Clark County School District.

Jennifer Lopez Romero, C.C.Ronnow Elementary School.

**Carson City:**

Keeli Killian, Washoe County School District.

Kate Schum, Washoe County School District.

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

President West called the meeting to order at 9:02 a.m. Roll call attendance was taken as reflected above and quorum was established. The Pledge of Allegiance was led by Commissioner Kenny Belknap.

### **2. PUBLIC COMMENT #1**

1. Keeli Killian, Washoe County School District, provided public comment regarding (Item #7) NAC 391.180 and NAC 391.315. *(A summary of the statement is available in Appendix A).*
2. Dr. Osvaldo Garcia, Clark County School District, provided public comment regarding (Item #8) NAC 391.036. *(A summary of the statement is available in Appendix A)*
3. Grant Hanevold, Chief Education Officer for Public Education Foundation, provided public comment regarding (Item#8) NAC 391.036. *(A summary of the statement is available in Appendix A)*
4. Jennifer Lopez Romero, C.C.Ronnow Elementary School, provided public comment regarding (Item#8) NAC 391.036. *(A summary of this statement is available in Appendix A).*
5. Michelee Crawford, Clark County School District, provided public comment regarding (Item #8) NAC 391.036. *(A summary of this statement is available in Appendix A)*
6. Diann Huber Ed. D, Founder and Strategic Advisor, iteach Nevada, provided public comment regarding (Item# 8) NAC 391.036. *(A summary of this statement is available in Appendix A)*
7. Laura Clewley, Clark County School District, provided public comment regarding (Item# NAC391.036. *(A summary of this statement is available in Appendix A)*
8. Keri Altig, Coordinator IV for Clark County School District, provided public comment regarding (Item #7) NAC 391.180. And NAC 391.315. *(A summary of the statement is available in Appendix A).*
9. Kate Schum, Human Resource Manager, Washoe County School District provided public comment regarding (Item# 9) NAC 391.0896. *(A summary of this statement is available in Appendix A)*
10. Dawn Huckaby, Executive Director of Human Resources at Lyon County School District provided public comment regarding (Item#9) NAC 391.0896. *(A summary of this statement is available in Appendix A)*

### **3. APPROVAL OF MARCH 16, 2022, MINUTES**

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

**4. PRESIDENT’S REPORT**

President West informed the committee of a productive discussion regarding NAC regulation and providing feedback. This provided more collaboration and opportunity for the committee to discuss items before coming back in a more formal matter.

**5. SECRETARY’S REPORT**

Jeff Briske, Director, Office of Educator Development, Licensure and Family Engagement, Director Briske stated the meeting would be more informal due to not having any Public Workshops or Hearings. After the March meeting, Ms. Sanchez and Director Briske took recommendations back to the stakeholder groups for further discussion. He explained that the Department planned to use the meeting as a work session to ensure the intent of the Commission’s recommendations had been captured.

**6. OCCUPATIONAL THERAPY AND PHYSICAL THERAPY ENDORSEMENT  
(Informed/Discussion) THE COMMISSION WILL HEAR SUGGESTED CHANGES  
TO NAC 391.277 AND NAC 391.279.**

Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement, Director Briske stated a workshop was held regarding (2) regulations for Occupational Therapy and Physical Therapy. As discussed, the Department brought additional changes to the regulation. In NAC 391.277 subsection (1) removal of (a) and (c). an Occupational Therapist cannot hold a license issued by the Board of Occupational Therapy in this State without having completed the requirements in letter (a). A certification in school systems is issued by the American Occupational Therapy Association. Subsection (2) was added with other Educational Licensed Personnel who do not provide direct instruction in reading, writing, or math. At the request of the American Occupational Therapy Association and the Nevada Board of Occupational Therapy, an endorsement was added.

President West pointed out that this meeting is purely for discussion purposes if something comes to you after the fact don't be afraid to get your comments over to Mr. Briske, so, it can be contemplated before bringing this back to us.

Director Briske noted if you have any further comments at this time, you can send them over to him or Ms. Sanchez. We will certainly put those in as suggestions, we do plan on bringing comments /discussions for an official public workshop at the May meeting. Commissioner Stokes asked a question about reciprocating licenses. he knows that in his school district, most of the Occupational Therapists employed are typically contractors. He wondered if this change in the regulation takes into account the reciprocity of licensure from another state.

Director Briske reported that the Department rarely issues an endorsement for Occupational and Physical Therapy. Section (3) says that an endorsement is not required to work in the school's district for those services. As far as reciprocity, the Department would reciprocate a license from another state.

Commissioner Wenger thanked DOE for making changes because they don't have to do renewal requirements. OTs are required to do their own renewals through their licensing boards

- 7. COUNSELING AND SCHOOL PSYCHOLOGIST ENDORSEMENT (*Informed/Discussion*) THE COMMISSION WILL HEAR SUGGESTED CHANGES TO NAC 391.180 AND NAC 391.315.** Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement, Director Briske noted that through additional discussion with relevant stakeholders, input from the Commission, and the intent of Senate Bill 151 (2021), the Department has brought additional changes. In **NAC 391.180**, subsection (3) was added exempting school counselors from the requirements of Praxis Core as they do not provide direct instruction to students in areas of reading, writing, or math. Subsection (4) regarding renewing the license has been updated based on feedback from the Commission. In **NAC 391.315** subsection (2) was added exempting school psychologists from the requirements of Praxis Core as they do not provide direct instruction to students in the areas of reading, writing, or math. In subsection (3)(a), the renewal requirement is the same as the counseling regulation above, again to follow the intent of Senate Bill 151. Section (b) is suggested to be removed as it negates the intent of SB151.

Commissioner Wenger noted that she definitely agrees with the removal of the Praxis Core and we understand the need to continue taking the subject area exams. People noted in their public comments the removal of the national certificate. She understands that it's negating the Senate Bill 151 intent. However, the national organizations meet that intent, so she feels like they fulfill it. The Commission will discuss keeping those national certification languages.

Commissioner Belknap noted he agrees with the other commissioner and especially after the comments. He thinks we need to reconsider that; he would like to echo previous commissioner comments on this.

President West stated commissioners can work with legal on making sure we satisfy the intent of the legislation and bring this back to the Commission at a later date.

Director Briske stated as President West indicated, he will check with our attorney general offline.

- 8. COMPETENCY TESTING (*Informed/Discussion*) THE COMMISSION WILL HEAR SUGGESTED CHANGES TO NAC 391.036.**

Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement, Director Briske has stated from future agenda items, competency testing would come before this Commission. Assembly Bill 225 (2021) amended NRS 391.021 adding subsection (2). The Commission is adopting regulations that shall consider including alternative means demonstrating competency for persons with a disability or health-related need. The Commission has an opportunity to provide alternative methods for measuring competencies for all educators. Which course work was included as an alternative method for the Core? In NAC 391.036, this Commission has already moved to send to public hearing regulation 114-20 allowing the ACT and SAT scores to be accepted in lieu of the Praxis Core with passing

scores of 21 and 1100 respectively. Section 3(c) is suggested to address additional alternative measures for all teachers.

When exams are considered valid has been extended from 5 to 10 years allowing for persons who may have taken the ACT, SAT, Praxis or another equivalent exam earlier in their career before deciding to pursue teaching. To specifically address AB225 for persons with a disability or other health-related needs, the Commission would need to make additional changes to sections 4 and 5.

The Department will be contracting with an outside group to conduct research and lead the discussions with a final report presented to the Commission of their findings and recommendations to ensure any regulations adopted by this commission are: In compliance with AB225, remove barriers by offering alternative measures for all teachers for the Praxis Core, and keep standards high for licensing teachers for our students.

President West stated the proposed language speaks to a lot of comments that we heard this morning so that commissioners can have a clear understanding.

Commissioner Roberts noted we would like to bring up something regarding the test after not providing courses after the testing. We know that at UNLV all students who are going into the teaching program must go through the three courses of reading, writing, and math and then take the Praxis. If they don't pass the Praxis, they would have to go back and take the course again. She wondered if this would be redundant, the fact they already took the course, and they also must pay to get the course again. If we could consider that somehow if they already took the courses, they don't have to take them again if they don't pass the Praxis.

Commissioner Wenger asked how common is it for someone to go into the UNLV prep program and take a reading, writing, and math course, then they must take the Praxis?

Commissioner Roberts stated if they must pass the Praxis and they just keep taking it until they pass it, they are provided a lot of support.

Commissioner Wenger stated we would also echo your suggestions, where did the five points of passing come from, and what was the reasoning behind that?

Director Briske stated if students take the test and miss the cut score by five points then can take another course or micro-credential to demonstrate their competency. Anything that the Commission decides would demonstrate competency if it's an exam to comply with NRS.

President West stated as discussed, that they're doing some additional work to evaluate similar requirements in other states and all that information will be brought back during the workshop.

Commissioner Tucker stated if they don't pass the Praxis and they don't have to go back and take the same course that they took before the Praxis. Are we going to offer something

different or is that what we're going to investigate in the workshop? Or something to supplement or help them be successful. Thank you.

Director Briske stated that the Department is planning to hire an outside consulting group to help work through these issues and bring that full report back to the Commission in another work session prior to having the workshop.

Commissioner Roberts stated a lot of students are not passing the core exam, surprisingly students don't have trouble passing the content area they're teaching. They have trouble passing the Praxis core and a lot of it has to do with language. Most of the students who don't pass are second language learners. The reason, they do well in classrooms is because the pace is slower, and the support is stronger.

Commissioner Stokes stated along those same lines, we've always thought of the Praxis as being a post graduate test or after they receive a bachelor's degree. But it sounds like there is some interest in taking a test prior to taking the course. Are we trying to see what the individual knows prior to going into teaching or after completing a program? My question is if we still are requiring some sort of outcome then maybe this is yet to be determined. President West stated the intent behind the course work is to prepare the individual to take the Praxis. However, if there are impediments to completing that particular test then we need to provide support.

Commissioner Tucker noted that we should be personally aware of the Praxis. Especially where English is not the student's first language. We work with second language learners, and we understand that we are missing a great opportunity for some of these people to become new teachers in our district. We do believe that our children deserve to have a more diverse group teaching them. We question the state testing and the requirement that every single student should have to reach a certain score?

President West stated, we want to make sure that we're fostering an education system that creates great people rather than just perfect test takers.

Director Briske stated, ETS offers accommodations for test-takers when English is not their first language as well as test-takers who may have a disability or health-related needs. All that information is on the ETS website where they can request those accommodations.

Commissioner Belknap asked if there was any way that we can find alternative tests that might be more performance-based or nationality normed so that we are on average with the rest of the nation rather than relying on what Praxis sets as these cut scores instead of making wiggle room for five points. If we look at just the national norm and try to fall within that average, that might be another alternative route to go with. We're looking at more than just making sure it is performance-based and making sure they have the skills for the classroom. He is in support of a lot of these additions. I believe ETS does have



other tests, looking for alternatives other than just hitching our wagon directly to the Praxis.

Commissioner Wenger stated if someone else mentioned that testing is not the be-all-end-all for our students. We're having this conversation that kind of echoes the way we talk about our kids. We're applying that conversation to educators, as we agree with Commissioner Belknap, we support the ideas, and our intent is to remove barriers. How can we remove the barriers of this Praxis? If they've succeeded in their everyday work, that should absolutely be a workaround. In terms of the course instead of the test.

Director Briske stated as we discussed a small correction regarding ETS and the setting of cut scores. It is our Commission that can set the cut scores. The Commission in the past has usually followed their suggestions on the multi-state test review and nationally cut scores. It's certainly up to the Commission to set that cut score for Nevada. we want to make sure we do not forget that we do have to follow AB225, which means we must determine an alternative measure that does not have to be a test for those teachers who have a disability or health-related need.

President West stated we have an opportunity here to revisit the NAC as a function of the legislation and the idea that gives us an opportunity to expand in other areas to address various issues.

**9. EMERGENCY SUBSTITUTES (*Informed/Discussion*) THE COMMISSION WILL HEAR SUGGESTED CHANGES TO NAC 391.0896.**

Jeff Briske, Director, Office of Educator Development, Licensure, and Family Engagement, Director Briske stated the changes to NAC 391.0896 were adopted by this body in Public Hearing on February 24, by the State Board on February 25, and by the Legislative Commission on February 28 of this year. This regulation is not yet codified in the Nevada Administrative. In subsection 2, the length of the license was extended from 1 to 3 years. In subsection 8, a loophole was corrected by adding subsection 7. In subsection 10 additional competencies were added at the request of stakeholders. Those are restorative practices, confidentiality and Family Educational Rights and Privacy Act (FERPA) guidelines, district policies and procedures, model code of ethics, and lesson plan implementation. It was suggested by stakeholders to focus on the competencies of the training rather than a prescribed seat time. If the Commission agrees with competencies over seat time, then the language can be struck. Subsection 11 was added at the request of stakeholders. Subsection 12 regarding evaluations and subsection 13 regarding annual reports have been added at the request of the Commission.

Commissioner Belknap stated if we are going to put a requirement on it or at least number of hours it needs to be more than just one. Last time we talked; it was eight hours. So, one hour does not even come close to being able to touch a third of what we outline in what is included in the competencies there. The other recommendation fits perfectly with parts (C) and (D) under (B) of what the districts need to do who are employing emergency substitutes.

Commissioner Tucker stated that she agrees that one hour of training is not even close to enough. She remembers speaking to a member of the human resources office last time they were here, and they said that Washoe County requires 3 hours. Again, not even close to enough, the problem is we're not willing to pay these people for their training and we are not going to get people who will work on an emergency basis to help us out if they must give up eight hours of their own time to train to do it again. We can't ask someone to give up eight hours and not pay them.

Anabel Sanchez stated why the one hour was still there even after it was discussed. During the workshop for emergency sub-regulation, it was brought to our attention that having eight hours is not feasible for the smaller school districts. They don't have the resources, especially in school districts where the superintendent is the only school principal. This is also the main person in charge of everything and they don't have the same systems to keep track of the emergency substitutes that they hire. It was also brought up in public comments that they just don't have the tools. The workgroup was very adamant about having the competencies and concepts rather than a specific amount of time for training.

Commissioner Stokes stated for several years in Nevada, we have all benefited from the regional professional development programs. This is a great opportunity for the smallest of our districts to take advantage of that training. They not only provide the training, but also the pay for that training. We encourage anybody who might be listening who's representing a district to consider that.

Commissioner Roberts stated that she agreed with that, we also believe they should be paid, but this may create another problem. Or is there some way that they can be compensated for that time? They do need to know something before going into a classroom.

Commissioner Wenger stated she echoes what other commissioners are saying, especially Commissioner Tucker. It's never enough time, I'm going to have to concede on this time requirement. Maybe suggest we leave it as an hour or perhaps do that bracket that Ms. Sanchez had mentioned three to eight hours. I also wanted to echo what Commissioner Belknap suggested about having some sort of structured evaluation for these substitutes. The variability across the state across building principals. She stated that she did think that the report should include those evaluations.

Commissioner West asked Mr. Briske of the Commission had to tie it to a time frame? Obviously, different people absorb information in different ways and then certainly on different levels. We think the idea may create a bureaucratic nightmare, but if we have an understanding of the expectations of the curriculum, then we can have the district complete the necessary training.

Commissioner Tucker asked if there was any way to create these classes online for people to take. We can't expect people to be qualified to do something and not respect them

enough to pay them for it. She stated that the data requested needs to be a realistic expectation for people to provide. She asked about the possibility of a statewide list of restorative practice classes, classes on confidentiality, district policies, and district or state uniform evaluation for subs. The evaluation has to be uniform and done easily. We need good data, but we also need data that's realistic for people to provide.

Commissioner Roberts stated she would like to add that if we are going to be asking them to take workshops or trainings on particular topics, then we would assume it's like taking a driving test that you would have to be evaluated on. In addition, as a substitute, you're not the one developing the lesson plans. Usually, somebody else has developed them and you have to implement them. It wouldn't be fair to have them do something they haven't been trained on; it would be easy to develop some kind of grid with those particular areas.

Anabel Sanchez stated on item #12 that we're asking employers to conduct an evaluation measure of some sort. It was brought up in the workgroup that they have different abilities to conduct that evaluation, and they would have the choice of what type of evaluation. They already have a system similar to what was said, but they either write comments or they just don't hire the substitute to come back to the school. They already have some kind of evaluation, but they wanted that autonomy to be able to have their own.

Commissioner Wenger stated districts could be empowered to have their own evaluation system and then they could inform the Department of the evaluation system. As we are contemplating perhaps striking the one hour and just leaving it blank because you can't do all those things in one hour. Washoe does three hours already. We need to set the standards in all of these areas.

Commissioner Tucker asked if all districts have trainings for teachers that they take every year. She stated that in Washoe County, they must take safe schools every year. If all districts have the same required trainings, then it may be possible to just ask substitutes to take specific ones.

Director Briske stated that he agreed with points from everyone. Commissioner Stokes mentioned maybe tapping into RPDPS to help design the training. The Department can certainly reach out to the districts to see what trainings are offered or required. He stated that he liked what Commissioner Belknap said about making a standardized type of evaluation. Commissioner Belknap reminded the Commission that the evaluation was only for the emergency subs that are serving in a long-term position. The data absolutely needs to be collected by the Department. We have to be able to provide a quality education in an emergency situation to ensure students continue to learn.

Director Briske stated that he agreed with Commissioner Belknap. The data is very important. There is a need to keep it as standardized and as simple as possible to get good information while allowing the teachers to do it quickly.

President West stated that the Commission is talking about requiring quite a bit as it relates to the emergency substitutes, but we don't have the same requirements for substitutes in general. It's worth a conversation about what sort of standardization we want to have across the whole spectrum.

Director Briske reminded the Commission that that is why the Department included, in the member's packet, the regular sub regulation, 391.0897, Some of these suggestions for trainings in the emergency sub regulation could easily be mirrored in the sub regulation.

Commissioner Belknap stated that he thought the Commission should mirror all of it. Teachers are observed three times a year and get a full evaluation. Teaching kids as a long-term sub the sub is required to do lesson planning, grading and doing almost everything a teacher does, but with zero accountability. We need to find ways to help support student learning, and by standardizing this and making sure that the people that we have long-term subbing are doing the job. There should be some type of evaluation where it requires an admin to go in there and just see what they're doing. Make sure that they're not just putting on movies every day, making sure these kids are learning.

Commissioner Wenger stated she completely echoes what Commissioner Belknap was saying, especially if it is a long-term sub situation. We don't see any language in the emergency sub about it being tied to a specific time in that classroom. Are we missing something? The only language we see is they can't be an emergency sub in the same classroom for more than five days in a 20-day period.

Director Briske stated that is correct, emergency subs have limited time in a certain classroom within that 20-day period. The regular substitute license does not have that provision.

Commissioner Wenger stated maybe we could add some language about that evaluation occurring in a long-term sub situation. we don't know how we would want to define that, but we think it should be done.

President West stated that it seems like based on the conversation we've had the emphasis really needs to be on the evaluation of the person in the classroom. Being able to use that constructively.

Commissioner Wenger stated we still need all of those data points because what classroom where they serving in? Were they serving in our special education where their needs are much higher than in general education classroom? He stated that he thinks that all pieces of that data are necessary.

Commissioner Belknap asked about emergency subs being hired to work as long-term subs. Director Briske stated the way the regulation is written they cannot serve more than five days in a 20-day period in the same classroom. What the Commission may be referring to is once they are hired as an emergency sub during a state of emergency, if the state of emergency is lifted, they can continue to be employed in that district for the remainder of the school year.

Commissioner Belknap stated that's where my confusion must have been, but we do think there needs to be a revisit for those who are long-term subs, some type of evaluation done by an administrator to ensure that these students are learning.

Commissioner Wenger stated the evaluation in the regular substitute role would be more in depth, especially in a long-term situation because we're asking them to serve in a classroom.

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

Director Briske stated he is currently working with the client relations director to come in and give us an update on the multi-state test reviews. Tests that were regenerated, or any new test. The Commission does have the option to adopt or not adopt the new tests and to set the cut scores. He stated that he was hoping to bring that person in at the May or July meeting since there isn't a Commission meeting planned for June. Additional future agenda items may be the possible Licensure updates for teacher residents, school psychology assistants, and school psychology interns, possible public workshops and public hearings, possible licensure updates for Teacher Residents, School Psychology Assistants, and School Psychology Interns, and a competency testing workshop to be held at a later time.

**11. PUBLIC COMMENT #2**

The was no public comment.

**12. ADJOURNMENT**

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

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

1. Keeli Killian, Washoe County School District, provided public comment regarding (Item #7) NAC 391.180 and NAC 391.315.
2. Dr.Osvaldo Garcia, Clark County School District, provided public comment regarding (Item #8) NAC 391.036.
3. Grant Hanevold, Chief Education Officer for Public Education Foundation, provided public comment regarding (Item#8) NAC 391.036.
4. Jennifer Lopez Romero, C.C. Ronnow Elementary School, provided public comment regarding (Item#8) NAC 391.036.
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9. Kate Schum, Human Resource Manager, Washoe County School District provided public comment regarding (Item# 9) NAC 391.0896.
10. Dawn Huckaby, Executive Director of Human Resources at Lyon County School District provided public comment regarding (Item#9) NAC 391.0896.

**ITEM A1: KEELI KILLIAN**

Summary of Public Comment:

Provided public comment regarding NAC 391.180 and NAC 391.315.

Good morning,

I am a current member of the American School Counseling Association, past president of the Nevada School Counselor Association. I'm submitting public comment in favor of the proposed changes to agenda item# 7 NAC 391.180 endorsement of a school counselor #3 & #4. I can speak confidently that most or all our school counselors are favorable to being exempt from the requirements of NAC 391.036. Specifically, the Praxis core academic skills for educator's test. We currently required to take the Praxis professional counselor test, which should suffice in addition to obtaining a master's degree in school counseling that meets licensure requirements. The past year the legislature passed SB 151 requiring school counselors and school psychologists to complete continuing education. As determined by the Commission on Professional Standards and Education, I would be in favor of keeping the current proposed PD requirement for suicide ethics, cultural competency diversity equity, and inclusion. I was able to attend the school mental health partnership meeting last Friday with The Department of Education. I see that it's been stricken from this draft, but there was a proposal to bypass the legislation in favor of using National Board. So, I just wanted everyone to know that the option of National Board for licensure renewal has been around for years.

It's currently written to obtain that certification through The National Board for Certified School Counselors. I'm just curious why we would bypass legislation in favor of using renewal requirements that we already have. So, if there's a discussion on that I'm happy to give more input. The National Board for Certified School Counselors is not a professional organization that oversees school counseling. That would be The American School Counseling Association. I'm in favor of keeping that, but also for this conversation. If it comes up or future conversations, I recommend that the Commission look into certifications that are already designated by our professional organization. Which is The American School Counseling Association, but there's nowhere listed for licensure renewal or endorsement. The American School Counseling Association has two designated certifications. One is to ask a certified school counselor, which demonstrates school council knowledge in designing, implementing, and assessing a school counseling program. And it's an application that is rigorous to try and get the certification, the most high-level achievement for school counseling would be from The American School Counseling Association and it's called Ramp, it is recognized as a model program. If the commission were to consider adding any certification, I would recommend that they look at that from our professional organization which is recognized as a model program. The model program recognizes that schools and counselors are committed to delivering comprehensive data informed school counseling programs aligned with the national model. Which also supports our evaluation.



**ITEM A2: DR. OSVALDO GARCIA**

Summary of Public Comment:

Provided Public comment regarding NAC 391.036.

Hello, I am Dr. Garcia, I am speaking on the behalf of agenda item# 8, Competency Testing. We are in favor of allowing teachers to take classes to remove the Praxis requirement. I oversee the world language instruction in Clark County School District and for us, we have teachers that are experts in the field. Some of course are not experts in English because sometimes they have English as a second language. When teachers have these requirements to test, sometimes we are creating barriers so that we are now eliminating teachers that could potentially be great teachers. I know since my supervisory role is to oversee the instruction, I see great instruction in world language. Some of these teachers have a lot of difficulties when it comes to taking a Praxis exam. Not only do they have to look at the test, but they also have to translate it on the fly. Imagine someone that is taking a timed test having to do double the work. We are in favor of having these classes in lieu of the Praxis to give them access to their career and the profession.

### **ITEM A3: GRANT HANEVOLD**

Summary of Public Comment:

Provided Public comment regarding NAC 391.036

Good morning, members of the Commission my name is Grant Hanevold for the record. I am the Chief Education Officer at the Public Education Foundation. I've been there for the last two years prior to that, I spent 30 years with the Clark County School District and retired as region one superintendent. I am here to speak on item# 8 like the previous gentleman. Part of our work at the Public Education Foundation has been to help fill the void of teachers that we have in this state. Particularly not only are we short teachers in general, but we are short in diverse teachers. One of our efforts has been to work with support professionals who are currently working in Clark County School District. We surveyed 20,000 support professionals and found that 1400 plus wanted to become teachers. So, we started having conversations with these folks and I started meeting with these folks and getting to the root causes of what some of the barriers have been. The Praxis test kept coming back again and again, so I started digging a little deeper into the research to identify what's really going on with this Praxis test nationwide. What is the research telling us as a result of some of these tests? It's somewhat alarming that the research tends to show us that it is minorities tend to fail assessments at a significantly higher rate than our white population. Maybe we are not preparing our undergrads to get into postgraduates, I don't know where the barrier is, but all of the research says that you need to have teachers that look like the students they serve.

We clearly do not have that at Clark County, for example, 75% minority however 75% of the teachers are white. I've been working with a number of support professionals who want to move into these roles and unfortunately, some of them are struggling to pass. Particularly the math or the writing assessment. Like to previous gentlemen before me those that come here as a second language, or some of those folks that re-career in their thirties and forties and maybe haven't taken the algebra, or geometry that's tested on the Praxis. It's just so far off in their past that they don't have the skills they need to pass those tests. So, I wanted to share some information that I gathered in my own research. Allowing teachers to be certified on the basis of how they perform on the Praxis will guarantee that some low-quality teachers become certified. We know that's true because we have teachers currently in jobs in our state that are ineffective and they're there with a license. So having passed the Praxis does not obviously guarantee that they're going to be effective. But also guarantees that some high-quality teachers will not become certified. I can tell you that because I've been working with two teachers, in particular, one is an early childhood kids' program, autism teacher and another one is a kindergarten teacher both minority teachers, both at high-risk poverty schools. They have three years of above-average evaluations, yet both are looking to be removed from the classroom. One in January of 2023 and one in October of 2022. It's absolutely tragic to hear the stories of these folks that are missing this test by one or two points and yet are having such a positive impact on their community, and such a positive impact on the kids they serve. There's plenty of research out there, and some research I pulled from Hannah Scheck in 2005 found that there's essentially no difference between the effectiveness of teachers who had not passed the state licensure exam and those who had. Teachers who failed the licensure exam were more likely to be minorities and more likely to have taken an alternative route for a teacher's license. I'll talk a little bit about that as well because our work at the foundation, we've been working with all the pathways. One of the

prerequisites is to pass the Praxis I to get into an elementary education program. You have to pass the Praxis I, ironically to get into an early childhood kids' program or to get into a special education teacher program. You do not have to pass the Praxis I prior to entering the profession. So, the teachers I'm dealing with right now are people that have actually been in the classroom for three years. I dislike to even think about how many of the ARL teachers we've turned away who have not passed the test and how many people that wanted to be elementary education teachers that we've turned away because they haven't been able to pass the Praxis I. We're losing good people and the majority of those good candidates are minority candidates. In both Math and English Language Arts, the difference between those who passed and those who fail is negative. The difference is not statically significant, which means the Praxis I is essentially screening out some of the individuals who may be ineffective teachers.

It's also screening out those that are potentially effective. Supporters of testing anticipate that these measures will greatly enhance the quality of teachers entering the field. There are many skeptics who are concerned that standardized testing is a barrier that will limit the supply of good applicants, thus discouraging those who are actually qualified from considering a teaching career. We are in crisis; we know that The State of Nevada and Clark County in particular are in a crisis when it comes to teachers. We're looking at ways to get more folks into the classroom, and we don't need to lower the standards but remove some of these barriers or look at and consider some of these alternative routes for people that have demonstrated competency. The test is a good predictor of one thing, future test-taking performance, they have not found any strong evidence to support the relationship between a test-taker performance and the teacher's performance in the classroom. The most comprehensive study was conducted between 2005 and 2009 where 75,000 test takers of the Praxis I was assessed, of those African Americans made up 11% of the pool of applicants, and whites made up 80% of the pool of first-time Praxis test-takers. The first-time pass rate for the whites was approximately 80% the first pass rate for African American students was approximately 40%, which should be alarming on all kinds of levels. That data exists and what was more alarming to me is where I really kicked myself as I have been apart of this system in this southern Nevada for the last 33-plus years. The fact that I didn't take this more to heart when I was in the district really bothers me because now that I'm outside the district, I have more time to look at the specific data. We've known this for more than a decade and we're continuing to put barriers in front of some of our minority applicants. We would be better served if we search for more innovative approaches to improving teacher quality.

Thank you for your time.

**ITEMA4: JENNIFER LOPEZ ROMERO**

Summary of Public Comment:

Provided public comment regarding NAC 391.036

Good morning, my name is Jennifer Lopez Romero. I'm a kindergarten teacher, this is my first year as a teacher. I have previously worked as an assistant teacher for the resource room intermediate room and I'm here to tell you my story about the Praxis test. I'm from El Salvador, that is a small county in Central America, I came to this country when I was about 14 years old and had no English or anything. I went to high school, and I did my four years of high school here. During my high school years, I was more worried about learning the language my teachers were providing me. I didn't know about college until one teacher approached me and told me a little bit more about how the university and college were here in the United States. I decided to enroll myself in college for nursing but after my first semester, I knew that was not my passion or my dream. My dream as a little kid was to be a teacher. So, I decided to go into the teaching career, in my last year in college at CSN one of my professors asked me if I had taken the Praxis test and I didn't know what the Praxis test was. My professor explained to me what a Praxis was, so I took them, and I didn't pass them. I prepared myself with study books to practice online but I wasn't successful. The previous gentlemen mentioned it's hard to translate everything at the time while knowing that you must answer all these questions. I was able to be successful in my English classes because I had more time to prepare myself. I had more time to write essays and CSN teachers helped me with my writing. I prepared myself for every lesson before I go to the classroom to make sure I understand what I'm going to be teaching. What I'm going to be teaching I prepare the language and vocabulary because as you notice I have an accent and English is my second language. It's very hard to think that I'm about to give up my dream job because I haven't passed the Praxis exam. This is a little bit challenging writing is not my strongest, and I have to take classes. I have been preparing myself for it but just haven't been successful. It's a short amount of time that I have to write two essays, one essay takes me a week to make sure what I'm doing is correct. I have a translator at home, support of other professionals that I can use to help me with writing. Next year I'm going to be teaching a part of dual language program that we're going to have at school, I will be teaching Spanish and I'm worried that I may just do it for a year because my license is going to expire next year. I have a passion for teaching so I'm very worried about it, also my friends that are in the education field are working on their bachelor's degrees. So they're worried that they haven't passed the Praxis as well, so please take that into consideration. I love teaching, that's my goal because of these barriers, I had to start from zero again. So, I thank you so much for your time.

## **ITEM A5: MICHELEE CRAWFORD**

### **Summary of Public Comment:**

Provided Public comment regarding NAC 391.036

Hello, my name is Michelee Crawford thank you Commission for having me today. I'm here to speak on agenda item# 8. I am a school principal and also Jennifer Lopez's principal and how could you not want to advocate for this after being exposed to so many of these stories? I'm also a researcher who served in the Air Force and Army National guard where I researched discrepancies and barriers between representation. One of the research studies that I conducted was to identify why we do not have diverse teachers; I had a pool of about 1,700 teachers that I began with, and the biggest barrier was the Praxis test.

Mr. Hanvold mentioned that he didn't know why there were so many less people that passed the Praxis that were of color. There actually is a lot of research on that and it has a lot to do with ethics and race matching. So, students that have just one teacher because all of us from all backgrounds are students should be exposed to. But just one teacher by the time they hit fourth grade that looks like them and has experiences like them are 39% less likely to drop out of high school. The reason why that is according to the Economic Labor Institute which did a very extensive study on ACT and Star testing. It's because that teachers that have the same ethic or race matching have higher expectations for their students.

They give up on them not as fast as someone else would from a different culture or race. When we have teachers, future teachers that can't pass the Praxis it's really just part of the process of them not having been exposed to someone that looks like them. What we're doing here with Praxis is we're basically recreating the problems that we're having now.

I'm in the military and we have standards, and the standards are the lowest bar that we hold ourselves accountable for and if we meet the standards, that's a disappointment to what you want to achieve. I'm thinking about the standards of the Praxis and how we can't even pass the bar, I'm wondering what do we want to achieve? Are we achieving it? We want high expectations for our students and incredible teachers in the classroom. The Praxis is not the bar that is measuring holistically, we need alternative pathways so that we are able to show that we can be good teachers and have a measurement with that standardized test. Teachers' evaluations or whatever we think is fair that's another story to really measure. What we're doing right now is we're creating our future problems and we're continuing to do what's not right for our students. So, I would like to propose that if a teacher did not pass the Praxis that they have an alternative measure that means taking another course. That measures the same thing the Praxis does but provides the support so that they can use the curriculum to read through and answer it right in a timely manner. This will show all the competencies that the Practice does without the pressure. Thank you so much for allowing me to speak on agenda item# 8.

**ITEM A6: DIANN HUBER**

Summary of Public Comment:

Provided Public comment regarding NAC 391.036

Thank you for the opportunity to provide public comment on the Alternative Measures to Praxis. Earlier this year, I had the privilege to serve on a task force to identify alternative avenues by which applicants to teacher certification programs could identify and demonstrate basic skills in reading, writing, and mathematics. (NAC 391.036)

iteach, a teacher preparation program that is nationally accredited by the Council on the Accreditation of Educator Preparation, CAEP, currently is approved to offer teacher certification in multiple states: Texas, Louisiana, Hawaii, Nevada, District of Columbia, Florida, and Indiana. Each state is unique in its requirements not only for admission to a preparation program but for state licensure.

Most states required the demonstration of basic skills. While this can be shown through passing the Praxis Core test, which is a college admission requirement, many states hold that demonstration of basic skills in reading, writing, and mathematics is demonstrated by holding a conferred undergraduate degree.

I urge the Commission on Professional Standards to allow for holding a conferred undergraduate degree to fulfill the demonstration of basic skills in reading, writing, and mathematics requirement.

**ITEM A7: LAURA CLEWLEY**

Summary of Public Comment:

Provided Public comment regarding NAC 391.036

I am currently a licensed sub and hold a bachelor's in Educational Studies as well as a master's degree in Secondary Education. The timed and long Praxis exams are a big hurdle for me to fulfill a position to be a teacher in Clark County School District. This is the difficulty of passing the reading core and ELA content as well.

**ITEM A8: KERI ALTIG**

Summary of Public Comment:

Provided Public comment regarding NAC 391.180 and NAC 391.315.

Good morning,

I read through the potential changes to the NAC regarding school psychologists' license renewal and I am strongly opposed to the removal of the "...OR, hold a certificate of renewal for NCSP...".

One of our recruiting efforts in the Clark County School District is that our state has reciprocity with the NCSP - meaning we do not have additional licensing requirements when holding the NCSP.

For those of us who have the NCSP, we are required to have 75 continuing education credits, every three years (10 of which are to be NASP approved), and in certain subject areas (e.g., ethics; equity, diversity, social justice, etc.). Those of us who have the NCSP already take these courses/ceus as part of the NCSP renewal process. Please oppose the striking through of the "...OR hold a certificate of renewal".

Keri



**ITEM A9: KATE SCHUM**

Summary of Public Comment:

Provided Public comment regarding NAC 391.0896

In reference to item #9 on the Agenda for COPS on April 20, 2022, please accept the following public comment:

Washoe County School District is in support of the current mockup of agenda item 9 related to emergency substitute teachers. We would like to thank the staff and other district practitioners who worked together to find common ground on this important measure. We ask that you adopt this framework as presented so we can get to work on filling our classrooms with the best and brightest substitute teachers available.

Thank you,  
Kate Schum

**ITEM 10: DAWN HUCKABY**

Summary of Public Comment:

Provided Public comment regarding NAC 391.0896

Dawn Huckaby, Executive Director of Human Resources at Lyon County School District

Good morning, Commission,

I apologize that I had other commitments and could not attend the Commission meeting in person.

Regarding Substitute Emergency Substitute licenses, Lyon County School District has relied on emergency substitutes for our classrooms when no regular substitute licensed person is available.

This has become increasingly needed during the pandemic. Our current fill rates for our classrooms are hovering at 79%, which means that without our emergency subs, our current teachers must try to fill in and give up their prep time to support classes where we do not have subs.

LCSD is in support of emergency subs to have training in content areas to assist our substitutes to be better prepared to be in the classroom. We feel the training should not be about how much time is spent in training, rather than specific content be met. These subs work only when needed and may be assigned to different classes each day that they work. LCSD does not have the resources to report out every emergency sub and every assignment they took all year. Please consider the resources of rural districts, which is the original purpose of emergency subs. Our emergency subs pay for a license every year, which is a financial burden to them, especially when they are doing the work just to help out the school. Emergency subs are typically parents who volunteer in classes, they are not doing the job of an emergency sub in order to make a career of it. LCSD supports a three-year renewable license for these subs who come in to ensure there is an adult in every classroom when needed.

LCSD has a thriving Grow Your Own program, one of our best recruitment strategies as teacher prep program completers decrease throughout the nation. Because we have partnered with Western Nevada College and have high school graduates who also receive an associate degree upon graduation, we have some students who have the 60 credits required for a sub license upon high school graduation. LCSD has board policy GDD which limits those under 21 to be a substitute teacher in elementary through eighth grade and requires a substitute teacher to be 21 years to sub at the high school level. We support requiring a substitute teacher to be 21 to teach at the high school level.

Thank you for hearing our public comments.

Dawn Huckaby