

**From:** [REDACTED]  
**To:** [NRED Administration](#)  
**Subject:** Re: LCB FILE No. R199-22  
**Date:** Wednesday, February 14, 2024 3:24:20 PM

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Good afternoon!

Please see my comments below:

1) I do not foresee any national instructors being willing to participate in mandatory training that is specific to Nevada. I imagine it would almost be insulting to them. This regulation has the potential to limit highly qualified national instructors from being willing to come to Nevada, or will cause them to increase the cost of their class to account for the extra time.

2) I have questions about the instructor workshop: Who is teaching? Who is writing it? What is the quality control mechanism of this workshop so that it can be proved that it improves instructor practice?

3) If the intent of this regulation change is to improve instructor practice, has the Division given any consideration to creating a rubric with standardized methods of assessment? My Bachelor's and Master's Degrees are both in education. As a classroom teacher, we were given clear standards that we were assessed on. Having clear, measurable requirements is important for everyone involved (instructor, sponsor, and Division) and encourages better instructor practice. Also, whatever happened to the class auditors?

4) Page 8, Sec. 11 (4): This section needs clarification. It currently reads that a licensee needs to meet criteria 1, 2, AND 3, OR 4. This leads some licensees to the conclusion that they must have some college credits or a bachelor's degree to become an instructor.

The simplest solution is to add "or" after items 1 and 2.

Example:

*The person has:*

*(1) A bachelor's degree or a more advanced degree, plus at least 2 years of full-time experience, in [the] each field in which he or she will be providing instruction; or*

*(2) Teaching experience of at least 75 hours in [the] each field in which he or she will be providing instruction within the 3 years immediately preceding the date of the person's application for [approval] registration plus at least 3 years of full-time experience in that field; or*

*(3) At least 6 years of full-time experience in [the] each field in which the person will be providing instruction; or*

*(4) Any combination of at least 6 years of college-level course work and full-time experience in [the] each field in which the person will be providing instruction;*

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[REDACTED]



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