

**PROPOSED REGULATION OF THE COMMISSION ON
PROFESSIONAL STANDARDS IN EDUCATION**

LCB File No. R159-26

August 21, 2026

EXPLANATION – Matter in *italics* is new; matter in brackets ~~omitted material~~ is material to be omitted.

AUTHORITY: §§ 1-5, NRS 391.019 and 391.032.

A REGULATION relating to educational personnel; revising provisions that authorize a person who does not hold an endorsement as a school counselor to serve as a school counselor on a provisional basis; establishing requirements for the internship, practicum or field experience in school counseling that is required to obtain an endorsement as a school counselor; revising the qualifications to obtain an endorsement as a school counselor; and providing other matters properly relating thereto.

Legislative Counsel's Digest:

Existing law requires the Commission on Professional Standards in Education to adopt regulations prescribing the qualifications for licensing teachers and other educational personnel. (NRS 391.019) Under existing regulations, a person is required to hold an endorsement as a school counselor issued by the Department of Education before counseling pupils. (NAC 391.180) However, existing law and regulations authorize a person who does not hold such an endorsement to serve as a school counselor on a provisional basis under certain circumstances. Specifically, under existing law and regulations, the Superintendent of Public Instruction is authorized to: (1) issue a provisional license or endorsement as a school counselor to a person who is enrolled in an educational program for an endorsement as a school counselor and who provides support or services related to school counseling for the purpose of completing any internship, practicum or field experience required for the endorsement as a school counselor; or (2) approve a person who does not hold an endorsement as a school counselor and has certain qualifications to serve as a school counselor for a period of not more than 3 years if the school district or charter school at which the person will serve demonstrates that a person with an endorsement is not available for employment. (NRS 391.019; NAC 391.055, 391.056, 391.187) This regulation revises the requirements for a person who does not hold an endorsement as a school counselor to serve as a school counselor on a provisional basis and the qualifications to obtain an endorsement as a school counselor.

Sections 2 and 3 of this regulation remove existing provisions authorizing a person to obtain a provisional license or endorsement as a school counselor while completing any required hours of practicum, internship or field experience in school counseling. (NAC 391.055, 391.056) **Section 5** of this regulation repeals the authority for the Superintendent of Public Instruction to approve a person who does not hold an endorsement to serve as a school counselor on a

provisional basis under certain circumstances. (NAC 391.187) Instead, **section 1** of this regulation establishes the requirements for a person to obtain a provisional endorsement as a school counselor, which is valid for 3 years and is not renewable. Under **section 1**, the holder of such a provisional endorsement is authorized to provide support or services related to school counseling as an intern for the purpose of completing any hours of practicum, internship or field experience in school counseling required to obtain an endorsement as a school counselor. Additionally, **section 1** requires the internship of the holder of the provisional endorsement to: (1) be conducted pursuant to an agreement between the school counseling program in which the holder is enrolled and the public school at which the holder will be employed; and (2) commence concurrently with or after the completion of the last required training in the school counseling program. Finally, **section 1**: (1) requires the holder of the provisional endorsement to be under the direct and ongoing supervision of a school counselor who holds an endorsement as a school counselor; (2) requires the holder of the provisional endorsement to have regular consultation with a representative of the school counseling program in which the holder is enrolled; and (3) prohibits the holder of the provisional endorsement from being the sole evaluator who conducts a formal mental health risk assessment or threat assessment or being the primary signatory to such an assessment.

Section 5 repeals the existing requirements for a person to qualify for an endorsement as a school counselor, and **section 4** of this regulation adopts revised requirements for a person to qualify for such an endorsement. (NAC 391.185) Specifically, **section 4** removes the requirement that to qualify for an endorsement as a school counselor, a person who has a master's degree or more advanced degree in a subject other than school counseling or counseling must have at least 2 years of teaching experience or 2 years of school counseling experience in addition to completing 36 hours of graduate courses of study in school counseling and 600 hours of practicum, internship or field experience in school counseling. Instead, **section 4** authorizes any person who has a master's degree or more advanced degree in a subject other than school counseling to qualify for the endorsement by completing 48 hours of graduate courses of study in school counseling and the 600 hours of practicum, internship or field experience in school counseling. Finally, **section 4** revises the graduate courses of study in school counseling that the person is required to complete to qualify for the endorsement.

Section 1. Chapter 391 of NAC is hereby amended by adding thereto a new section to read as follows:

1. The Department may issue a provisional endorsement as a school counselor to a person who has not completed the hours of a practicum, internship or field experience in school counseling required by NAC 391.180 if the person:

(a) Has a bachelor's degree or higher degree conferred by a regionally accredited college or university;

(b) Is currently and continuously enrolled in a regionally accredited college or university school counseling program; and

(c) Has completed the 48 hours of course work required for a school counseling endorsement pursuant to NAC 391.180.

2. A provisional endorsement issued pursuant to this section is valid for 3 years and may not be renewed.

3. A person who holds a provisional endorsement issued pursuant to this section may provide support or services related to school counseling as an intern in accordance with this section for the purpose of completing an internship to satisfy the required hours of a practicum, internship or field experience in school counseling. The internship of the holder of the provisional endorsement must:

(a) Be conducted pursuant to an agreement between the public school at which the holder is an intern and the school counseling program of the regionally accredited college or university in which the holder is enrolled, which must set forth the duration of the internship and may include work during the school year of the public school that may extend after the enrollment of the holder in the school counseling program; and

(b) Commence concurrently with or after the completion of the last training required as part of that school counseling program.

4. A holder of a provisional endorsement issued pursuant to this section who is employed by a public school pursuant to subsection 3:

(a) May provide support or services related to school counseling, including, without limitation, instruction, individual counseling, group counseling and consultations;

- (b) Must work under the direct and ongoing supervision of a person who holds an endorsement as a school counselor issued pursuant to NAC 391.180;*
- (c) Must have regular consultation with a representative of the school counseling program of the regionally accredited college or university in which the holder is enrolled;*
- (d) Must not serve as the sole evaluator conducting any formal mental health risk assessment or threat assessment or be the primary signatory of any such assessment; and*
- (e) May participate in a mental health risk assessment only as a member of a multidisciplinary team and under the direct supervision of a person who holds an endorsement as a school counselor issued pursuant to NAC 391.180.*

Sec. 2. NAC 391.055 is hereby amended to read as follows:

391.055 1. Except as otherwise provided in NAC 391.242, the Superintendent of Public Instruction may issue a provisional 1-year license or endorsement to a person who holds a renewable license issued in this State if the person otherwise meets the requirements for licensure, but:

- (a) Has a deficiency in credits of 6 semester hours or less; *or*
- (b) Is a teacher, licensed and practicing in this State, applying for an additional license, other than for the teaching of pupils with disabilities, outside his or her grade level of experience as a student teacher . ~~or~~
- ~~—(c) Lacks confirmation from a college that the person has completed a school counseling practicum or internship if applying for a school counseling endorsement, but:~~
- ~~——(1) Has completed all the required course work for the school counseling endorsement;~~

~~—— (2) Has completed 200 hours of the practicum or internship through a regionally accredited college or university, to include a minimum of 100 hours in a school setting at the time of application for licensure; and~~

~~—— (3) Is currently and continuously enrolled in a regionally accredited college or university school counseling practicum or internship program. }~~

2. Except as otherwise provided in section 1 of LCB File No. R129-22, any experience as a teacher's aide, a teacher's assistant, an instructor of pupils in a Junior Reserve Officers' Training Corps or Jobs for America's Graduates program or a substitute teacher obtained by the holder of a provisional license, who is a teacher, licensed and practicing in this State, but who lacks student teaching experience at the proper grade level, will not be credited towards the requirement for teaching experience or student teaching necessary to qualify for the additional license or endorsement.

3. Any credits earned by the holder of a provisional license or endorsement to qualify for an elementary, secondary or special license, a license to teach special education, a license to teach middle school or junior high school education or a license to teach pupils in a program of early childhood education will not be counted as credits required to renew the elementary, secondary or special license, the license to teach special education, or the license to teach middle school or junior high school education.

4. If holding an elementary, secondary or special license, a license to teach special education, a license to teach middle school or junior high school education or a license to teach pupils in a program of early childhood education is a prerequisite to qualifying for a particular provisional endorsement, any credits earned by the holder of the applicable license to qualify for that provisional endorsement may be counted toward:

- (a) Removal of the provision under which the provisional endorsement was issued; and
- (b) Renewal of the applicable license.

Sec. 3. NAC 391.056 is hereby amended to read as follows:

391.056 1. The Superintendent of Public Instruction may issue a provisional nonrenewable license to an applicant applying for a license pursuant to NAC 391.045 if the applicant:

(a) Otherwise meets the requirements for a license pursuant to NAC 391.045, but ~~is~~ ~~—(1) Has~~ *has* a deficiency in credits of 6 semester hours or less for all areas of licensure or endorsement, unless the provision is for an endorsement as a substitute teacher; or

~~{(2) If the applicant is applying for a school counseling endorsement pursuant to NAC 391.185, lacks confirmation from a college that the applicant has completed a school counseling practicum or internship, but:~~

~~—(I) Has completed all necessary course work requirements for the school counseling endorsement;~~

~~—(II) Has completed 200 hours of the practicum or internship through a regionally accredited college or university, including, without limitation, a minimum of 100 hours in a school setting at the time of his or her application for licensure; and~~

~~—(III) Is currently and continuously enrolled in a regionally accredited college or university school counseling practicum or internship program; or~~

(b) Has not passed the tests required by NAC 391.036 and is not exempt from taking such tests.

2. A license issued pursuant to this section expires 3 years after the date on which the license was issued.

3. The holder of a license issued pursuant to this section may add endorsements with provisions to the license during the first year in which the license is valid. Endorsements without provisions may be added to the license at any time during the period in which the license is valid. If an endorsement is added to the license, the endorsement does not affect the date on which the license becomes invalid.

Sec. 4. NAC 391.180 is hereby amended to read as follows:

391.180 1. ~~{The Department will issue an endorsement as a school counselor to provide counseling to pupils enrolled in kindergarten through grade 12 to qualified applicants.~~

~~—2.†~~ Except as otherwise provided in ~~{NAC 391.187,†}~~ *section 1 of this regulation*, a person must hold an endorsement as a school counselor before counseling pupils.

2. To qualify for an endorsement as a school counselor, a person must hold:

(a) A master's degree or a more advanced degree in school counseling conferred by a college or university that is:

(1) Regionally accredited; and

(2) Accredited by a national accrediting association for school counseling programs recognized by the Commission;

(b) A master's degree or a more advanced degree and meet the requirements of subsection 3; or

(c) A specialty credential as a national certified school counselor issued by the National Board for Certified Counselors.

3. A person who desires to qualify for an endorsement pursuant to paragraph (b) of subsection 2 must have completed:

(a) At least 600 hours of a practicum, internship or field experience in school counseling at any grade level in kindergarten through grade 12 which was served in an accredited school system or a school system that is approved by the Superintendent of Public Instruction; and

(b) At least 48 semester hours of graduate credits in school counseling, aligned with the standards of a national accrediting association for school counseling programs recognized by the Commission, including course work in each of the following areas of study:

(1) Professional counseling orientation and ethical practice;

(2) Social and cultural identities and experiences;

(3) Lifespan development;

(4) Career development;

(5) Counseling practice and relationships;

(6) Group counseling and group work;

(7) Assessment and diagnostic processes; and

(8) Research and program evaluation.

4. A person who holds only a special license with an endorsement as a school counselor is exempt from the requirements of ~~subparagraphs~~ *subparagraph* (1) ~~and (2)~~ of paragraph (a) of subsection 1 of NAC 391.036 ~~+~~

~~4.~~ *to pass a competency test in basic reading, writing and mathematics.*

5. To renew an endorsement as a school counselor, the holder of the endorsement must:

(a) Comply with the provisions of NAC 391.065 for the license held by the person and complete professional development consisting of:

(1) At least 1 hour during the previous calendar year related to ethics in the practice of school counseling;

(2) At least 1 hour during the previous calendar year related to evidence-based suicide prevention and awareness or another course of instruction on suicide prevention and awareness; and

(3) At least 1 hour during the previous calendar year related to cultural competency and diversity, equity and inclusion;

(b) Provide proof that the person holds a valid certificate as a National Certified School Counselor issued by the National Board for Certified Counselors or its successor organization; or

(c) Provide proof that the person holds a valid certificate as a Certified School Counselor issued by the American School Counselor Association or its successor organization.

Sec. 5. NAC 391.185 and 391.187 are hereby repealed.

TEXT OF REPEALED SECTIONS

391.185 Qualifications for endorsement as school counselor.

1. To qualify for an endorsement to serve as a school counselor, a person:

(a) Must hold a master's degree or a more advanced degree in school counseling;

(b) Must hold a specialty credential as a national certified school counselor issued by the National Board for Certified Counselors;

(c) Must hold a master's degree or a more advanced degree with a major in counseling conferred by a regionally accredited college or university and meet the requirements of subsection 2; or

(d) Must:

- (1) Hold a master's degree or a more advanced degree conferred by a regionally accredited college or university;
- (2) Have at least 2 years of teaching experience or at least 2 years of school counseling experience; and
- (3) Meet the requirements of subsection 2.

2. A person who desires to qualify for an endorsement pursuant to paragraph (c) or (d) of subsection 1 must have completed:

(a) At least 600 hours of a practicum, internship or field experience in school counseling at any grade level in kindergarten through grade 12; and

(b) At least 36 semester hours of graduate credits in school guidance and counseling in each of the following areas of study:

- (1) The process of individual counseling;
- (2) The process of group counseling;
- (3) Testing and educational assessments;
- (4) Legal and ethical issues in counseling;
- (5) Career counseling;
- (6) Organization and administration of school counseling programs;
- (7) Multicultural counseling;
- (8) Child and family counseling; and
- (9) Two of the following:
 - (I) The use of technology in education.
 - (II) Exceptional children.

(III) Human growth and development.

(IV) Substance abuse counseling.

391.187 Authorization to serve as school counselor without endorsement.

1. The Superintendent of Public Instruction may authorize a person who has not received an endorsement pursuant to NAC 391.185 to serve as a school counselor in a school district or charter school if the school district or charter school demonstrates that a person with an endorsement issued pursuant to NAC 391.185 is not available for employment. To receive an authorization pursuant to this subsection, a person must:

(a) Hold a current license issued by the Superintendent of Public Instruction, excluding a business and industry endorsement;

(b) Hold a master's degree in a field related to school counseling or an advanced degree in a field related to school counseling;

(c) Have completed at least:

(1) Two years of teaching experience at any grade level in kindergarten through grade 12;

(2) Two years of school counseling experience at any grade level in kindergarten through grade 12; or

(3) A practicum, internship or field experience in school counseling at any grade level in kindergarten through grade 12 in addition to the practicum, internship or field experience that is completed pursuant to paragraph (e);

(d) Be admitted into a regionally accredited graduate-level program in school counseling;

(e) Complete at least 600 hours of an initial practicum, internship or field experience in school counseling at any grade level in kindergarten through grade 12; and

(f) Have completed at least 24 graduate credits in the following areas of study:

- (1) The process of individual counseling;
- (2) The process of group counseling;
- (3) Testing and educational assessments, as applicable to a school setting at any grade level in kindergarten through grade 12;
- (4) Legal and ethical issues in counseling;
- (5) Developing careers and choosing occupations;
- (6) Organization and administration of school counseling programs;
- (7) Multicultural counseling;
- (8) Child and family counseling, as applicable to a school setting at any grade level in kindergarten through grade 12; and
- (9) One of the following:
 - (I) The use of technology in education.
 - (II) Exceptional children.
 - (III) Human growth and development.
 - (IV) Substance abuse counseling.

2. The Superintendent shall not authorize a person to serve as a school counselor pursuant to subsection 1 for more than 3 years. Such an authorization may be issued only once per person.