



April 24, 2026

Re: Testimony in Opposition to Regulation R102-25

On behalf of the Nevada Association of School Boards

The Nevada Association of School Boards (NASB) respectfully expresses concern with the proposed changes outlined in Regulation R102-25.

While we fully support maintaining high standards for professionals serving students, this regulation introduces additional degree requirements beyond existing licensure standards for occupational therapists, physical therapists, and therapy assistants. These changes, though well-intended, risk creating unintended barriers to entry into these critical professions.

School districts across Nevada are already experiencing significant challenges in recruiting and retaining specialized staff. By requiring advanced degrees—such as a master’s for occupational therapists and a doctorate for physical therapists—this regulation may reduce the pipeline of qualified candidates willing or able to work in school settings. Over time, this could limit access to essential services for students, particularly in rural and hard-to-staff districts.

Importantly, current licensure requirements already ensure that these professionals meet rigorous standards to safely and effectively serve students. Adding additional degree mandates does not necessarily improve service quality but may instead increase costs for individuals and discourage entry into the field.

NASB is concerned that, in the long run, this regulation could exacerbate workforce shortages and negatively impact student access to vital therapeutic services.

For these reasons, NASB respectfully opposes Regulation R102-25 and encourages consideration of alternative approaches that maintain quality standards while preserving a strong and sustainable workforce pipeline.

Thank you for your consideration.

Rick Harris, Executive Director