

**To: Members of the State Board of
Education & Early Development**

March 11, 2025

From: Dr. Deena Bishop, Commissioner

Agenda Item:11A

◆ ISSUE

The board is being asked to adopt the proposed revisions to 4 AAC 12.380 (e), amending retired teacher, substitute teacher terms from 120 consecutive days to 165 consecutive days.

Additionally, the board is being asked to adopt the proposed revisions to 4 AAC 12 by adding 4 AAC 12.412. National Board Certification. The revisions reflect updates to education regulation to align state statutes amended during the 32nd legislative session.

◆ BACKGROUND

- In May of 2024, the 33rd legislature passed HB 230 Teachers: Out-of-State Experience, Retired. This bill passed into law in October 2024. This bill contains two key provisions affecting Alaska educators:
 - An amendment to AS 14.20.20 (g), extending the amount of consecutive teaching days that a retired teacher certificate holder may teach in a classroom during a school year. A retired teacher may now teach 165 consecutive days.
 - An amendment to AS 14.20 to add section 14.20.225, Teacher incentive payments and reimbursement of costs related to Board Certification. This provision provides for incentive payments to teachers holding National Board Certification, and for reimbursement of costs to achieve National Board Certification, subject to legislative appropriation.
- To align regulation to reflect the amendment to AS 14.20.20 (g), DEED proposes a revision to 4 AAC 12.380 (e). This amendment revises the consecutive days a retired certificate holder can teach in a classroom from 120 days to 165 days.
- To align regulations to reflect the added section AS 14.20.225, DEED proposes that 4 AAC 12.412; National board certification be added to 4 AAC 12. This section provides for a reporting date for districts to identify teachers eligible for board certification reimbursement and for DEED to develop a process for reimbursement, subject to legislative appropriation.
- A copy of the proposed regulations follows this cover memo.
- Public comment has been received and follows this cover memo.

◆ OPTIONS

Seek more information.

Adopt the proposed regulations in business item 17A.

From: [Jolin, Kathijo M \(EED\)](#)
To: [mary dooher](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: National Board Certification: 4 AAC 12.412, Section (d)
Date: Friday, March 7, 2025 10:08:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: mary dooher <mpdooher@email.com>
Sent: Tuesday, March 4, 2025 4:00 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: National Board Certification: 4 AAC 12.412, Section (d)

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To: The Alaskan Department of Education and Early Development (DEED)

Hello,

I am writing today to advocate for DEED to **make amendments to the regulations of 4 AAC 12.412, Section (d) which defines "National board certification"**. These specific amendments should be to:

1. **Amend** the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.
2. **Amend** the regulations to specify that any incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations.

Please also see attached of a comparison chart between what is required for a 'National Board Certified Teacher' versus the more rigorous requirements for Speech Language Pathologists and Audiologists to pursue and maintain their 'ASHA Certificate of Clinical Competence', our national certification.

There are several other education based Related Service Providers (RSP) that have a national certification, or who have passed their national boards in order to work in schools, or to elevate the quality of their services. These RSPs include: Speech Language Pathology Assistants (SLPAs certified through ASHA), School Psychologists (NASP: National Association of School Psychologists), Physical Therapists (NPTE: National Physical Therapy Examination) and Physical Therapy Assistants (PTAs), Occupational Therapists (NBCOT: Nationally Board Certified Occupational Therapist) and Certified Occupational Therapy Assistants (COTAs), School Nurses (NBCSN: National Board for Certification of School Nurses).

I also urge DEED to make these amendments as many of these RSP positions are considered "Hard to Fill" in several districts. More and more Alaskan students are now receiving their special education services through a contractor in the Lower 48 that provides these services through an online platform. These virtual contractors must be used to provide these federally mandated services because Alaska is not consistently attracting, nor retaining, these education based Related Service Providers.

The State of Alaska and Governor Dunleavy developed the [Alaska's Teacher Retention and Recruitment Playbook \(August 2023\)](#), which has been a helpful start to bringing more educators to Alaska. Please remember that under that umbrella of 'Educators' are nationally board certified Related Service Providers, many of whom have a choice of settings that they can work in (education versus medical versus private settings). We choose to work in the education settings to support the Alaskan students with special service needs.

Thank you for your consideration of this request to **make amendments to the regulations of 4 AAC 12.412, Section (d) which defines "National board certification"**.

Sincerely,

Mary P. Doohar, M.A., CCC-SLP

Mat-Su Borough School District Speech Language Pathologist

ASHA Leadership Development Program Alumna

Cell: (315) 292-8926

From: [Jolin, Kathijo M \(EED\)](#)
To: [CHRISTINA GARNER](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Proposal to Amend Regulations for Related Service Providers Holding National Certifications
Date: Friday, March 7, 2025 10:09:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: CHRISTINA GARNER <CHRISTINA.GARNER@MATSUK12.US>
Sent: Tuesday, March 4, 2025 2:00 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Proposal to Amend Regulations for Related Service Providers Holding National Certifications

You don't often get email from christina.garner@matsuk12.us. [Learn why this is important](#)

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Dear Commissioner Bishop,

I am writing to respectfully encourage the Alaska Department of Education and Early Development (DEED) to amend its regulations to recognize and support Related Service Providers who hold national certifications from their professional boards or certifying bodies. Additionally, I urge the department to ensure that any incentives provided for these national certifications be structured in a manner that allows them to contribute toward educators' pension calculations.

Related Service Providers, including but not limited to speech-language pathologists, occupational therapists, physical therapists, school psychologists, and other specialized professionals, play a critical role in the educational success of Alaska's students. Many of these professionals hold rigorous national certifications that demonstrate their expertise and commitment to high standards of practice. However, current regulations do not explicitly recognize these credentials, which can limit professional growth opportunities and discourage highly qualified individuals from seeking or maintaining employment in Alaska's education system.

To support the recruitment and retention of highly skilled professionals in our schools, I request that DEED consider the following regulatory amendments:

1. **Recognition of National Certifications** – Amend regulations to formally acknowledge Related Service Providers who hold national certifications from recognized professional organizations. This recognition would validate their expertise and ensure they receive equitable opportunities within the education system.
2. **Pension-Eligible Incentives** – Amend regulations to ensure that any financial incentives awarded for national certifications are structured in a way that allows them to count toward pension calculations. This change would provide a meaningful incentive for professionals to pursue and maintain national credentials, thereby benefiting both the educators and the students they serve.

By implementing these changes, DEED would be taking a proactive step toward strengthening Alaska's education workforce, enhancing professional development opportunities, and ensuring that our students receive services from the most qualified professionals available.

Thank you for your time and consideration of this important matter. I appreciate your commitment to supporting Alaska's educators and service providers and would welcome the opportunity to discuss this proposal further. Please feel free to contact me at christina.garner@matsuk12.us should you require any additional information or clarification.

Sincerely,

Chrissy Garner, PT, DPT - Physical Therapist

Matanuska-Susitna Borough School District

Palmer High School – Ph: 907-746-8464 | F: 907-746-8481

Butte Elementary School – Ph: 907-861-5231 | Fax: 907-861-5280

Pioneer Peak Elementary School – Ph: 907-861-5709 | Fax: 907-861-5780

District Childfind & Infant Learning Evaluator

www.matsuk12.us

From: [Jolin, Kathijo M \(EED\)](#)
To: kdullen@gmail.com
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Request for Amendments to 4 AAC 12.412
Date: Friday, March 7, 2025 10:10:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Kristen Dullen <kdullen@gmail.com>
Sent: Monday, March 3, 2025 10:15 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Request for Amendments to 4 AAC 12.412

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Dear Alaska Department of Education and Early Development,

I hope this email finds you well.

I am writing to request important amendments to 4 AAC 12.412, section (d), regarding the definition of "National board certification."

Specifically, I urge you to:

1. Include Related Service Providers who hold National Certification from their professional boards/bodies. Related service providers including PT's, OT's, SLP's, and psychologists.
2. Ensure that any incentives paid for national certification count toward educators' pension calculations.

These changes are crucial for recognizing the contributions of related service providers and supporting their professional development.

Thank you for your consideration.

Sincerely,
Kristen Dullen
Physical Therapist
FNSBSD
(907)378-8744

From: [Jolin, Kathijo M \(EED\)](#)
To: [Heather Eisenman](#)
Subject: RE: AMEND 4 AAC 12.412
Date: Friday, March 7, 2025 10:09:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
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907.465.2802

From: Heather Eisenman <heathere@me.com>
Sent: Tuesday, March 4, 2025 9:13 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: AMEND 4 AAC 12.412

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Hello,

I am a speech-language pathologist working in the Fairbanks North Star Borough School district. I am writing today in favor of amending 4 AAC 12.412 Section (d) which defines "National board certification. Please do the following

1. Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.

2. Amend the regulations to specify that any incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations.

As a nationally certified speech pathologist it is important that my qualifications be recognized along side teachers. We all have important jobs and we are all highly trained and educated. Related-service providers deserve the same incentive and reimbursement as teachers.

Thank you,

Heather Eisenman, M.S., CCC-SLP
Speech-Language Pathologist
1528 Bluegrass Dr
Fairbanks, AK 99709

From: [Jolin, Kathijo M \(EED\)](#)
To: [Kristen Dullen](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Request for Amendments to 4 AAC 12.412
Date: Friday, March 7, 2025 10:11:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Kristen Dullen <kdullen@gmail.com>
Sent: Monday, March 3, 2025 10:10 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Request for Amendments to 4 AAC 12.412

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Dear Alaska Department of Education and Early Development,

I hope this email finds you well.

I am writing to request important amendments to 4 AAC 12.412, section (d), regarding the definition of "National board certification."

Specifically, I urge you to:

From: [Jolin, Kathijo M \(EED\)](mailto:dara.brann@k12northstar.org)
To: dara.brann@k12northstar.org
Cc: [EED, State Board \(EED sponsored\)](mailto:eed.stateboard@alaska.gov)
Subject: RE: Request for Amendments to 4 AAC 12.412
Date: Friday, March 7, 2025 10:13:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
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From: Dara Brann <dara.brann@k12northstar.org>
Sent: Monday, March 3, 2025 10:03 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Request for Amendments to 4 AAC 12.412

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Dear Alaska Department of Education and Early Development,

I hope this message finds you well. I am writing to request important amendments to 4 AAC 12.412, Section (d), regarding the definition of "National board certification." Specifically, I urge you to:

1. Include Related Service Providers who hold National Certifications from their professional boards/bodies.

2. Ensure that any incentives paid for national certifications count toward educators' pension calculations. These changes are crucial for recognizing the contributions of RSPs and supporting their professional development.

Thank you for considering this matter.

Sincerely,

Dara Brann
Occupational therapist
Fairbanks north star school district

From: [Jolin, Kathijo M \(EED\)](#)
To: [Laura Young-Campbell](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Stipend for National Teacher Boards
Date: Friday, March 7, 2025 10:14:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
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Department of Education and Early Development
907.465.2802

From: Laura Young-Campbell <laurayc@yahoo.com>
Sent: Monday, March 3, 2025 6:04 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Stipend for National Teacher Boards

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Dear Board,

As a ASHA nationally board certified, school-based speech-language pathologist (SLP), I strongly urge you to include individuals with ASHA CCC in the stipend program. AMEND 4 AAC 12.412, Section (d) which defines "National board certification".

1. Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.
2. Amend the regulations to specify that any incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations.

I am disappointed that you did not include the other educators in this proposal. Many professions within school have the opportunity to voluntarily receive national certification in their fields. My national certification is from the American Speech-Hearing Association which is the only accreditation body for us. In order for me to obtain my Certificate of Clinical Competence in speech-language pathology (ASHA, CCC-SLP), I must first, obtain a master's degree in speech/language, complete a 36-week "internship/CF" with three assessments and pass the Praxis exam. Only then can I apply for the ASHA CCC. In order to maintain my status as a nationally board certified SLP, I need to complete specific continuing education every three years.

In reviewing what teachers need for their national board certification, they do not require a master's degree, tests, 'internship' and renew every 5 years. As you can see the requirements for ASHA CCC exceed those of the NBPTS Certification. Attached is a grid outlining the differences and similarities

of both certifications.

	National Board Certificate Teacher	Speech Language Pathologist/Audiologist (SLP/AuD)
Certification Process	<ul style="list-style-type: none"> - Bachelors of Arts/Bachelors of Science degree - Portfolio showing how their practices meet NBCT standards: Submitting student work, providing videotapes of classroom interaction, written commentaries 	<p>From an ASHA accredited institution:</p> <ul style="list-style-type: none"> - Speech-Language Pathologists and Audiologists complete a minimum of 75 semester credit hours in a course of study addressing the knowledge and skills pertinent to their respective field. - SLPs/Auds are nationally certified, which requires a master’s degree for employment as an SLP and a doctorate AuD for Audiologists.
Experience Requirements for Certificate Eligibility	<ul style="list-style-type: none"> - Must have a bachelor’s degree. - Must have a state teacher certification - Computer-based exercises – written responses to prompts/stimulus materials- Must have 3 years of experience 	<ul style="list-style-type: none"> -Master's degree or higher - For SLPs: 400 supervised clinical observation and practicum hours followed by a Clinical Fellowship Year (CF): 36 weeks of full-time supervised work (supervisor must be ASHA certified SLP). - For Audiologists: Must complete practicum/meet standards for Council of Academic Accreditation’s standards for duration and for depth and breadth of knowledge. An estimated 1,820 hours of supervised clinical experience. - SLPs and Audiologists must pass rigorous national board examination (PRAXIS) in addition to the three assessments during the CF year.
Process Used for Certificate Renewal	<ul style="list-style-type: none"> - Certificate valid for 5 years - Renewal process typically done within the years before certificate expires - Must meet Maintenance of Certification (MOC) requirements 	<p>Speech-Language Pathologists and Audiologists must:</p> <ul style="list-style-type: none"> - renew certification annually - show continuing education credits or 30 hours every 3 years
Other considerations	<ul style="list-style-type: none"> - NBPTS is an independent, non-profit, organization created in 1987 	<ul style="list-style-type: none"> - ASHA established: 1925, certifying for 55 years.

	<ul style="list-style-type: none"> - Purpose is to improve student learning in schools by developing a new system of advanced voluntary certification for elementary, middle, and secondary school teachers - Not required - Recognition of excellence - Teacher training programs in AK for continuing education 	<ul style="list-style-type: none"> - ASHA’s Certificate of Clinical Competence is the only universally recognized credential in the profession. - Assures the public that an SLP/AuD has met rigorous, peer developed and reviewed standards endorsed by a national body. - Our peers are certificated teachers and other specialists (we are on the same pay scale; our contract says “teacher” not another title). - There are no masters level SLP/AuD programs in Alaska for continuing education. We must travel out of state to attend classes or participate in on-line courses specific to our fields. - Voluntary, not required to work in schools.
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Again, I urge you to amend 4 AAC 12.412, Section (d) to include all educators with national board certification to be included in the stipend.

Thank you for your consideration.

Laura Young-Campbell, MS, CCC-SLP
 ASHA Fellow
laurayc@yahoo.com
 907-355-2261

From: [EED, State Board \(EED sponsored\)](#)
To: [Elissa Bjorum](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Amend 4 AAC 12.412 Section (d) National board certification
Date: Friday, March 7, 2025 10:14:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
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Department of Education and Early Development
907.465.2802

From: Elissa Bjorum <elissabjorum@gmail.com>
Sent: Monday, March 3, 2025 4:49 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Amend 4 AAC 12.412 Section (d) National board certification

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To whom it may concern,

Please consider the following recommendations for 4 AAC 12.412 Section (d) "National board certification":

1. Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.

2. Amend the regulations to specify that any incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations.

Thank you for your time and consideration of this matter.

Sincerely,

Elissa Kaminsky, M.A., CCC-SLP

American-Speech-Language Hearing Association (ASHA) member number: 12052792

903 Lake Street

Sitka, AK 99835

elissaborum@gmail.com

(907) 752-0255

From: [EED, PIO \(EED sponsored\)](#)
To: "Christina Libert"
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Adjust Alaska HB 230
Date: Friday, March 7, 2025 10:15:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Christina Libert <christinalibert@me.com>
Sent: Monday, March 3, 2025 1:48 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Adjust Alaska HB 230

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I request that to AMEND 4 AAC 12.412, Section (d) which defines "National board certification".

Amend the regulations to include Related Service Providers holding National Board Certifications; All Licensed Physical Therapist are Board Certified as it is a requirement of their licensure, OTs and SLPs have a board certification offered by their state licensure.

Thank you I appreciate you considering this Amendment.

Christina Shurtleff PT, DPT, CSCS

From: [EED, State Board \(EED sponsored\)](#)
To: [KIM WRIGHT](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Alaska HB 230 - National Board Certification - please include Related Service Providers
Date: Friday, March 7, 2025 10:16:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
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907.465.2802

From: KIM WRIGHT <KIM.WRIGHT@MATSUK12.US>
Sent: Monday, March 3, 2025 10:50 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Alaska HB 230 - National Board Certification - please include Related Service Providers

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To Whom It May Concern,

I am a Speech Language Pathologist who has worked for Anchorage School District and Matanuska-Susitna Borough School District continuously since 1998. All Speech Language Pathologists (SLPs) in Alaska have come from another state or have left the state to get their training, degrees, and credentials as there is no degree program in Alaska. SLPs are required to have a master's degree, a Type C DEED certificate, and be nationally board certified to begin work in the schools in this state. In Alaska, our union considers us "teachers", despite our requirements for higher levels of education and training to even begin working in Alaska schools. This is not to diminish the value and contributions of teachers but to also acknowledge the critical role of speech language pathologists

and other related services in ensuring Alaska students receive a Free and Appropriate Public Education. House Bill 230 should include related service providers, such as speech language pathologists, in the amendment language. To deny the related service provider group of educators would send the message that our certification and contributions are not as valuable or necessary. I am asking that you amend 4 AAC 12.412 section (d) which defines “National Board Certification” to include related service providers holding a National Board Certification. Additionally, it is critical that the incentive payment count toward educator’s pension calculations. Our veteran SLP providers remain here because of the pension, so to assist with retention, the payment should be included as salary, counting toward the pension calculation. We need to support and acknowledge our veteran SLPs who are exhaustively training and mentoring a revolving door of new providers who come and go from the District at an alarming rate. Indeed, nearly half of our providers do not reside in Alaska, and it grows by the year, so we must use all available methods to retain the SLPs who have committed to be here in our state working with our students and value those who join us in person. Alaska kids deserve the best providers, and the best providers deserve the National Board Certification, in addition to our teachers.

Thank you for your consideration,
Kim Wright

Kim Wright, M.S., CCC-SLP
Speech Language Pathologist
Matanuska-Susitna Borough School District
(907)746-8444
kim.wright@matsuk12.us

From: [Jolin, Kathijo M \(EED\)](mailto:Jolin.Kathijo@EED)
To: angie.adams@k12northstar.org
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: National Board Certification stipend for related service providers
Date: Friday, March 7, 2025 10:16:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Angela Adams <angie.adams@k12northstar.org>
Sent: Monday, March 3, 2025 10:40 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: National Board Certification stipend for related service providers

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I would like to encourage the Alaska Department of Education to amend the regulations to include recognition of related service providers national certifications like a nationally certified teacher. As a Speech-Language Pathologist, I have done as much if not more than a classroom teacher to obtain and maintain my Certificate of Clinical Competence in Speech Language Pathology as a nationally certified teacher.

It is a very rigorous standard to obtain your American Speech-Language Association (ASHA) Certificate of Clinical Competence. There are also very strict standards to maintain that

certification. Those standards include 30 hours of field related continuing education hours every 3 years. Not only do those hours have to be field related, there also are specified types of continuing education courses that are often required. This last cycle at least one hour on ethics and 2 hours in supervision were required. Alaska does not have the options for acquiring the required continuing education hours in the state that are available in the lower 48. Yes, we have options for on-line continuing education courses but those are not the same as actually attending a conference or the National Convention. This stipend would help give an opportunity to attend conferences/conventions outside of the state.

Thank you for your time,
Angie Adams, MS. CCC-SLP

--

[Angie Adams](#)

[Speech Language Pathologist](#)

Arctic Light Elementary

(907) 356-2038 x28008

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From: [Jolin, Kathijo M \(EED\)](#)
To: marissa.williams@k12northstar.org
Subject: RE: Amendment Needed
Date: Friday, March 7, 2025 10:17:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Marissa Williams <marissa.williams@k12northstar.org>
Sent: Monday, March 3, 2025 8:58 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Amendment Needed

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Hello there!

I am reaching out as a national board certified speech-language pathologist who has been working in the Alaska public school system for a long time. I feel that it is only fair that those in my field also be considered for the \$5000 possible stipend that is being offered.

I am requesting the following:

-AMEND 4 AAC 12.412, Section (d) which defines "National board certification".

-Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.

Thank you for your time.

--

Marissa J. Williams

Denali Elementary School

Speech-Language Pathologist

(907) 452-2456 ext. 32209

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From: [EED, State Board \(EED sponsored\)](#)
To: [Kali Larson](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: AMEND 4 AAC 12.412, Section (d)
Date: Friday, March 7, 2025 10:17:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Kali Larson <KLarson@KPBSD.k12.ak.us>
Sent: Monday, March 3, 2025 8:46 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: AMEND 4 AAC 12.412, Section (d)

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Good Morning,

I wish to include my voice in the push to amend AAC 12.412, Section (d) which defines "National Board Certification." I ask that you (1) amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies, and (2) amend the regulations to specify that any incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations. I feel this change would increase the incentive for related service providers to work in Alaska. As you know, it can be a struggle to find individuals willing to work up here. In consequence, many of our local and loyal related service providers are left to take on large caseloads to meet IEP requirements. I appreciate your team in considering this amendment.

Kali R. Larson, Speech-Language Pathologist
Sterling Elementary School
(907)262-4944

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From: [EED, State Board \(EED sponsored\)](#)
To: [SUE STOKES](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Amend 4 AAC 12.412, Section (d)
Date: Friday, March 7, 2025 10:17:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: SUE STOKES <SUE.STOKES@MATSUK12.US>
Sent: Monday, March 3, 2025 7:55 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Amend 4 AAC 12.412, Section (d)

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As a 28-year educational audiologist I am requesting that DEED AMEND 4 AAC 12.412, Section (d) which defines "National board certification". Please consider making these two actions:

1. Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.
2. Amend the regulations to specify that any incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations.

See attached chart comparing what teachers and related service providers (specifically

Speech Therapists and Audiologists) have to do annually to maintain our national certification. Some of that is **required** for licensure in Alaska. We are on the same contract as teachers so we should be included in this opportunity.

Thank you for your consideration.

Susanne Stokes, MS, CCC-A (She/her) - *Educational Audiologist | Student Support Services*
Matanuska-Susitna Borough School District
Ph: 907-352-8206 | Fax: 907-352-8280 (WHS Front Office)

From: [EED, State Board \(EED sponsored\)](#)
To: [Margreat R Kirby](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: amend language to HB230
Date: Friday, March 7, 2025 10:18:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Margreat R Kirby <4kirbys@mtaonline.net>
Sent: Sunday, March 2, 2025 11:07 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: amend language to HB230

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March 2, 2025

To the Alaska Department of Education and Early Development,

Greetings! I am reaching out to you regarding HB 230 which provides a stipend to National Board Certified Teachers. I respectfully and sincerely request that you amend the regulations to include Related Service Providers (RSP) holding National Certifications from their professional boards/ bodies. Currently the language,

“national board certification” means individual achievement of national professional teaching standards. I would also ask that any incentive paid for national certifications be paid in such a way to count towards the educator’s pension calculations. This would be an even greater incentive for recruitment and retainment reasons.

I read a 2024 article that expressed numerous important points of this bill. This bill can strengthen our education system, be used as a “recruiting tool”, and even incentivize retired teachers to return to the classroom. I agree with many points of this article. This bill can also do the same thing for RSPs. We too have been and are experiencing a shortage of Speech-Language Pathologists (SLPs) and RSPs. Please allow me to share why it is imperative that SLPs as well as RSPs are included in this bill. I will speak from the SLP side since I am familiar with the national certification of SLPs. I do know that Audiologists, Occupational Therapists, Physical Therapists, and Vision Therapists are all experiencing shortages and have certifications in their respective fields.

I am an experienced, public school, Speech-Language Pathologist of 30 years come this August 2025. I have worked in Alaska for 22 years. This position took me to the Lower Yukon School District, Northwest Arctic Borough School District, and the Matanuska-Susitna Borough School District.

I was and am identified as a teacher in all three of these districts. Therefore, I have 2 titles, Speech-Language Pathologist and Teacher. The difference found in this bill is that it specifies teachers with certification from the National Board for Professional Teaching. I have my rigorous national certification from the American Speech-Language Hearing Association (ASHA). The importance of this bill rings true for SLPs and RSPs, not just “teachers”. We can also strengthen Alaskan school districts. Without our services then our schools are weakened. Senator Jesse Bjorkman shared his thoughts in the 2024 article by stating that being nationally certified denotes excellence in teaching and that these teachers are more effective teachers and proven to be better at their craft. SLPs are nationally certified which also denotes excellence in teaching and are also more effective teachers and proven to be better at our craft. Under this new law, teachers without national certification can seek the national certification and may have the costs covered by the school district or DEED. At this present time, I already possess my national certification and have for nearly 30 years. Therefore, many children have benefited

from my knowledge and experience as a nationally certified SLP.

I would like to contrast the stark difference between the nationally certified SLP and the nationally certified teacher.

CERTIFICATION PROCESS

National Board Certificate Teacher

- Bachelor of Arts/ Bachelor of Science degree, portfolio showing practices, submit student work/ video tapes of classroom interaction, written commentaries, computer-based exercises

Nationally Certified Speech-Language Pathologist

- complete a minimum of 75 semester credit hours in a course of study addressing the knowledge and skills pertinent to their respective field, national certification which requires a master's degree for employment as an SLP

EXPERIENCE REQUIREMENTS FOR CERTIFICATION ELIGIBILITY

National Board Certificate Teacher

- Must have bachelor's degree, state teacher certification, 3 years of experience

Nationally Certified Speech-Language Pathologist

- Must have a master's degree or higher, 400 supervised clinical observation and practicum hours followed by a Clinical Fellowship Year (CF): 36 weeks of full-time supervised work (supervisor must be ASHA certified SLP), must complete an unpaid internship and externship while attending college, must pass a rigorous national board exam (PRAXIS) in addition to the three assessments during the CF year

PROCESS USED FOR CERTIFICATE RENEWAL

National Board Certificate Teacher

- Certificate valid for 5 years, must meet Maintenance of Certification requirements, continuing education is not required

Nationally Certified Speech-Language Pathologist

- Renew national certification annually, complete continuing education every 3 years

OTHER CONSIDERATIONS

National Board Certificate Teacher

- NBPTS is an independent, non-profit, non-partisan organization created in 1987, purpose is to improve student learning in schools by developing a new system of advanced voluntary certification for elementary through secondary school teachers, TBC is voluntary and not required, recognition of excellence.

Nationally Certified Speech-Language Pathologist

- ASHA's Certificate of Clinical Competence is the only universally recognized credential in the profession, assures the public that an SLP has met rigorous, peer developed and reviewed standards endorsed by a national body, ASHA established in 1925, there are no masters level SLP programs in this state for continuing education so we must travel out of state to attend classes or participate in online courses specific to our field, ASHA CCC-SLP is voluntary and not required to work in schools, however, ASHA CCC-SLP is required for supervising/ mentoring assistants and CF Mentees, billing for Medicaid reimbursement, and are responsible for fulfillment of school-based IEP services when a student has been diagnosed with a Speech-Language Impairment or other Communication Disorder

I would like to share that SLPs and RSPs could greatly benefit from the amendment of the regulations to include RSPs holding National Certifications from their professional boards/ bodies. The recruitment and retainment benefits are great. A shortage of SLPs, nationwide, has been present for thirty plus years. The shortage we are experiencing, presently, is becoming devastating. This results in unfilled SLP positions year after year. For significant reasons, each year we lose trained SLPs who resign during the school year or at the end of the year. Replacements are hired at any time to fill the vacancies. Some of these candidates decide to turn down their offer well in advance or even wait too late. This causes undue hardship for everyone. This results in hiring tele-therapists who deliver speech-language therapy services via computer. This all increases the caseload numbers and paperwork demands; all the while we are supposed to work on Continuing Education Units due every 3 years. Nationally certified SLPs can also work in private practice, home health, hospitals and rehab units. The strategic measures found in this bill could sway some of the private sector SLPs to move over to the public-school side of employment.

Thank you for taking the time to read my letter. I hope that you can see the different

level of requirements for both professionals and will agree to amend the language. As you have seen above, SLPs are extremely educated, trained and certified. Gaining our initial certification was costly and remains even more costly to maintain. I hope that you will see the stark contrast between these two certifications.

Sincerely,

Margie Kirby, M. Ed. CCC-SLP

From: [EED, State Board \(EED sponsored\)](#)
To: "KACIE GEIBEL"
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Service Provider (SLP) Testimony
Date: Friday, March 7, 2025 10:18:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: KACIE GEIBEL <KACIE.GEIBEL@MATSUK12.US>
Sent: Sunday, March 2, 2025 10:56 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Service Provider (SLP) Testimony

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To Whom it may concern,

I am a National Board-Certified Speech-Language Pathologist, I believe SLPs and Audiologists should be included as a "National Board Certified" Educator and therefore be eligible for the incentive payment of \$5,000 to each teacher who is employed by the district or the department and who holds a current and valid national board certification per Alaska House Bill 230. Please AMEND 4 AAC 12.412, Section (d) which defines "National board certification". I want DEED to amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies. I also want DEED to amend the regulations to specify that any

incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations.

Thank you for your time,

-Kacie Geibel

From: [EED, State Board \(EED sponsored\)](#)
To: "Kim Ward-Massey"
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Please amend 4 AAC 12.412
Date: Friday, March 7, 2025 10:18:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Kim Ward-Massey <mcav0y@yahoo.com>
Sent: Sunday, March 2, 2025 9:33 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Please amend 4 AAC 12.412

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As a 20+ year speech language pathologist in the state of Alaska, I am asking you to AMEND 4 AAC 12.412, Section (d) which defines "National board certification".

I am asking that DEED:

1. Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies. (For me that would be the American Speech Language Hearing Association ASHA)
2. Amend the regulations to specify that any incentive paid for national

certifications be paid in such a way to count towards the educator's pension calculations.

We have an incredibly hard time recruiting and this pay boost can make school-based careers competitive compared to clinic and hospital settings.

Speech language pathologists are educators too, and I hope that you will do the right thing and include them in this bonus.

Kim Ward-Massey

From: [Jolin, Kathijo M \(EED\)](#)
To: [Anna McBride](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Amendment to AMEND 4 AAC 12.412, Section (d) to Include Related Service Providers
Date: Friday, March 7, 2025 10:19:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Anna McBride <f318220@k12northstar.org>
Sent: Sunday, March 2, 2025 9:06 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Amendment to AMEND 4 AAC 12.412, Section (d) to Include Related Service Providers

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Anna McBride
4795 Villanova Dr.
Fairbanks, Alaska, 99709
anna.mcbride@k12northstar.org
907-385-8785
3/2/2025

Department of Education & Early Development

Alaska Department of Education & Early Development

Dear Kathijo Jolin,

I am writing to formally request an amendment to the current definition of “National Board Certified” within the Alaska Department of Education & Early Development to include related service providers such as Speech-Language Pathologists (SLPs), Occupational Therapists (OTs), and Physical Therapists (PTs) who hold national certifications from their respective professional boards.

Currently, the National Board Certification designation applies primarily to classroom teachers. However, related service providers are essential members of the educational team and often hold rigorous national certifications that demonstrate advanced knowledge and expertise in their fields. For example:

-Speech-Language Pathologists (SLPs) hold national certification through the American Speech-Language-Hearing Association (ASHA) with the Certificate of Clinical Competence (CCC-SLP).

-Occupational Therapists (OTs) are certified through the National Board for Certification in Occupational Therapy (NBCOT).

-Physical Therapists (PTs) are certified by the Federation of State Boards of Physical Therapy (FSBPT).

Each of these professions requires extensive graduate education that often exceeds the credit requirements of a Master’s in Education:

-A Master’s in Education typically requires 30–45 credit hours.

-A Master’s in Speech-Language Pathology requires 50–75 credit hours, including academic coursework and clinical practicum.

-A Doctorate in Occupational Therapy (OTD) requires 90+ credit hours.

-A Doctorate in Physical Therapy (DPT) requires 90–120 credit hours.

In addition to graduate coursework, these professionals must complete a clinical supervision year before full certification:

-SLPs must complete a 9-month to 1-year Clinical Fellowship (CFY) under the supervision of an ASHA-certified mentor before earning their CCC-SLP.

-OTs must complete a 6-month supervised clinical fieldwork requirement before becoming fully licensed.

-PTs undergo full-time clinical internships totaling up to 36 weeks under the guidance of a licensed PT.

These supervised experiences are comparable to the mentoring and assessment required for National Board Certification in teaching, further justifying the inclusion of related service providers in the certification designation.

Maintaining national certification requires ongoing professional development and annual fees, similar to educators maintaining their National Board Certification:

-ASHA (CCC-SLP) Fees: \$225 annually, NBCOT (OT) Fees: \$65 annually, FSBPT (PT) Fees: \$100–\$150 annually, depending on the state.

These fees do not include the cost of continuing education, which is also required to maintain licensure and certification.

The need for this change is particularly urgent in the Fairbanks North Star Borough School District (FNSBSD), where nine SLP positions remain unfilled, forcing the district to rely on remote contractors. This shortage directly impacts students who require in-person support to succeed academically and socially. Recognizing nationally certified related service providers under the "National Board Certified" designation would help with recruitment and retention by providing these professionals with equitable recognition and potential financial incentives.

I appreciate your time and consideration of this request.

Sincerely,

Anna McBride

--

--

Anna (Brackney) McBride, M.S. CCC-SLP

Speech Language Pathologist

Woodriver Elementary School

(907)479-4211 ext. 47001

Procedural

Safeguards: <https://drive.google.com/file/d/1DknluDxNwGxdhCyTyN87OEnLQa06c5M1/view>

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From: [EED, State Board \(EED sponsored\)](#)
To: [Tara Bivins](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: National Board Regulations
Date: Friday, March 7, 2025 10:19:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Tara Bivins <tarabivins@gmail.com>
Sent: Sunday, March 2, 2025 1:29 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: National Board Regulations

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To Whom it May Concern,

I am confident that HB 230 regarding National Board Certification will make a significant impact on the quality of teaching and learning in Alaska. For HB 230 to have maximum impact, it is important that the incentive bonus a teacher receives count towards the teacher's pension calculations.

Thank you for your consideration,

Tara Bivins

National Board Certified Teacher

National Board Certification Candidate Support Provider

From: [EED, State Board \(EED sponsored\)](#)
To: [Susan Updegraff](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: stipend for board cert related service providers
Date: Friday, March 7, 2025 10:20:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Susan Updegraff <suzan_ecdf@yahoo.com>
Sent: Saturday, March 1, 2025 11:13 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: stipend for board cert related service providers

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To whom it may concern,
exclusion of Board Certified Related Service Providers from receipt of a stipend offered other qualified educators would be to deny them acknowledgement of their equally significant role in education process of Alaska's public school students.

Susan Sauer

[Sent from Yahoo Mail for iPhone](#)

From: [EED, State Board \(EED sponsored\)](#)
To: [Cyndi Mendoza](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: AMEND 4 AAC 12.412, Section (d) which defines "National board certification". We want DEED (aka the Regulators) to:
Date: Friday, March 7, 2025 10:20:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Cyndi Mendoza <cmendoza298@gmail.com>
Sent: Saturday, March 1, 2025 6:14 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: AMEND 4 AAC 12.412, Section (d) which defines "National board certification". We want DEED (aka the Regulators) to:

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1. Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.
2. Amend the regulations to specify that any incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations.

Sincerely
Cyndi Mendoza
MS CCC-SLP
Anchorage School District

From: [EED, State Board \(EED sponsored\)](#)
To: [K VS](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: House Bill 230 AMEND 4 AAC 12.412, Section (d)
Date: Friday, March 7, 2025 10:20:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: K VS <kvansaun@gmail.com>
Sent: Friday, February 28, 2025 10:31 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: House Bill 230 AMEND 4 AAC 12.412, Section (d)

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To Whom It May Concern,

I am writing to request an amendment to HB230 Section 4AAC 12.412, Section (d).

We are a State that historically has had difficulty attracting teachers AND related service providers, such as Speech Language Pathologists, School Psychologists, Audiologists, Deaf and Hearing Impaired Specialists and Occupational Therapists.

As a Speech Language Pathologist, employed by Alaskan School Districts for the last 20 years, I respectfully request you amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies. I would like the regulation to also specify that any incentive paid for national certifications be paid in a manner to count toward the educator's pension calculations.

Sincerely,

Kate Van Saun, MS/CCC-SLP

Member of American Speech and Hearing Association (ASHA)

ASHA #12039182

From: [Jolin, Kathijo M \(EED\)](#)
To: [BRANDY GALLATIN](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: AAC 12.412
Date: Friday, March 7, 2025 10:21:00 AM
Attachments: [image001.png](#)

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: BRANDY GALLATIN <BRANDY.GALLATIN@MATSUK12.US>
Sent: Friday, February 28, 2025 8:21 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: AAC 12.412

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Dear Members of the Alaska Department of Education and Early Development,

I am writing to express my strong support for amending 4 AAC 12.412, Section (d) to ensure that Related Service Providers (RSPs) with national board certifications receive the same recognition and benefits as National Board Certified teachers in Alaska.

As a school psychologist with a National Board Certification, I have undergone a rigorous certification process that demonstrates my expertise, commitment, and high standards in my

field. However, under the current regulation, Nationally Certified RSPs are not eligible for the same financial recognition as certified teachers.

I welcome DEED to:

1. Expand the definition of "National Board Certification" to include national certifications from professional boards that govern RSPs (e.g., ASHA for SLPs, NBCOT for OTs, NCSP for School Psychologists, etc.).
2. Ensure that the \$5,000 stipend for national certification applies to RSPs and counts toward retirement pension calculations, just as it does for National Board Certified teachers.

I appreciate your time and consideration, and I urge you to support this important amendment.

Brandy Gallatin

Have a wonderful day!

Brandy Gallatin, MA, SSP (*she/her*)

School Psychologist

Matanuska Susitna Borough School District

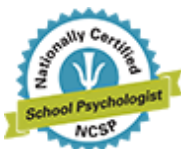
brandy.gallatin@matsuk12.us

Finger Lake Elementary

Mat - Su Day School

Project Search

Nationally Certified School Psychologist (NCSP)



From: [Jolin, Kathijo M \(EED\)](#)
To: ["alex.mihalich@k12northstar.org"](mailto:alex.mihalich@k12northstar.org)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Please...AMEND 4 AAC 12.412, Section (d)
Date: Friday, March 7, 2025 10:21:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Alex Mihalich <alex.mihalich@k12northstar.org>
Sent: Thursday, February 27, 2025 3:38 PM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Please...AMEND 4 AAC 12.412, Section (d)

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Hello.

To whom it may concern. It has come to my attention that the state wishes to recognize and encourage teachers to attain National Board Certification. As a means to incentivize this, they have elected to award National Board Certification holders with a \$5000.00 stipend via 4 AAC 12.412, Section (d). I am requesting that this regulation be applied to ALL school staff members who have earned and who hold National Board Certification in their respective areas. Related service providers, such as Speech-Language Therapists are required to meet National Board Certification requirements in order to work in schools in Alaska.

Please:

1. Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.
2. Amend the regulations to specify that any incentive paid for national certifications be paid in such a way to count towards the educator's pension calculations.

Thank you for your consideration of this request,

Alex Mihalich

--

Alex Mihalich, MS, CCC-SLP
Speech-Language Pathologist
FNSB School District
(907)452-2000, X11431

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From: [EED, State Board \(EED sponsored\)](#)
To: [KRISTEN ALLTON](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: Amend 4 AAC 12.412 National Board Certification
Date: Friday, March 7, 2025 10:22:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: KRISTEN ALLTON <KRISTEN.ALLTON@MATSUK12.US>
Sent: Thursday, February 27, 2025 9:33 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: Amend 4 AAC 12.412 National Board Certification

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To Whom it May Concern,

I'm the lead school psychologist for the Mat-Su Borough School District. This is my 14th year with the district. Our school psychology department has been understaffed for the last 5 years. If you amended the regulations to include school psychologists to receive the national board incentives this would help with our hiring process. Along with retention of current employees. We provide essential mental health services to student at schools, as well as services for students with disabilities. Please consider including related service providers into the bill.

Thanks,
-Kristen Allton

Kristen Allton, Ed.S, NCSP, LPC – *School Psychologist*
Matanuska-Susitna Borough School District
Shaw Elementary: 907-352-0548 | Valley Pathways High School 761-4650
Kristen.allton@matsuk12.us

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From: [EED, State Board \(EED sponsored\)](#)
To: [RACHEL LUND](#)
Cc: [EED, State Board \(EED sponsored\)](#)
Subject: RE: \$5,000 for Alaskan RSP Educators with National Board Certification
Date: Friday, March 7, 2025 10:22:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: RACHEL LUND <RACHEL.LUND@MATSUK12.US>
Sent: Thursday, February 27, 2025 9:26 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Subject: \$5,000 for Alaskan RSP Educators with National Board Certification

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Dear Alaska Department of Education and Early Development (DEED),

I'm writing on behalf of myself and other school nurses who have gone the extra mile to qualify for national board certification. Currently, teachers receive a \$5,000 stipend for national board certification. I ask that you please consider extending this stipend for national board certification to other related service providers working in Alaska Schools including but not limited to school nurses. Please consider the following amendments to the regulation 4 AAC 12.412.:

1. Amend the regulations to include Related Service Providers holding National Certifications from their professional boards/bodies.
2. Amend the regulations to specify that any incentive paid for national certifications be paid in

such a way to count towards the educator's pension calculations.

Current Language we want regulators (DEED) to amend (from House Bill 230):

"national board certification" means individual achievement of national professional teaching standards as certified by a nationally recognized board."

<https://www.akleg.gov/basis/Bill/Text/33?Hsid=HB0230D>

The Following Should be Amended:

4 AAC 12.412. National board certification: (d) In this section, "national board certification" has the meaning given in AS 14.20.225.

https://education.alaska.gov/state_board/january-2025/6.1A%204%20AAC%2012_20642906%20Proposed%20Regulations%2012-10-24.pdf

Thank you for your valuable time and energy. Please feel free to email me at any time with questions or concerns.

All the Best from your school nurse,

Rachel Lund, RN, BSN, NCSN
School Nurse at Big Lake Elementary

From: [Jolin, Kathijo M \(EED\)](#)
To: "Jada Kahl"
Cc: "mary dooher"; [EED, State Board \(EED sponsored\)](#)
Subject: RE: Proposed Changes to national board certification as described in AS 14.20.225.
Date: Friday, March 7, 2025 10:22:00 AM

Thank you for your review of the Department of Education and Early Development's proposed regulations for the implementation of statutory changes related to the passage of HB230. DEED recognizes that School Counselors, School Psychologists, and other related district positions are high demand and difficult to fill. However, in the regulations process, neither the State Board of Education nor DEED are able to add provisions that were not included in the passage of the law. As the approved statutory language explicitly limits the incentive payments to National Board Certified teachers, regulations cannot extend the payments to other positions beyond the scope of the law. Additionally, the statute does not include provisions allowing for inclusion of the incentive payments in retirement calculations, therefore this provision also cannot be added in regulation. If you are interested in amendments to the statutory language, it is recommended that you contact your legislative representatives to propose your amendments.

Alaska State Board of Education
The State of Alaska
Department of Education and Early Development
907.465.2802

From: Jada Kahl <jadakahl@gmail.com>
Sent: Tuesday, February 25, 2025 8:24 AM
To: EED, State Board (EED sponsored) <eed.stateboard@alaska.gov>
Cc: mary dooher <mpdooher@email.com>; Jada Kahl <jadakahl@gmail.com>
Subject: Proposed Changes to national board certification as described in AS 14.20.225.

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Kathijo Jolin
Hello my name is Jada Kahl and I work as an Occupational Therapist for the Juneau School District
I was wondering if you could send me the full proposed language changes to AS 14.20.225 regarding National Board Certification.

I want to be able to read the language to provide specific comment to ensure it includes my profession as well as other related service providers.

Jada Kahl

NEA-AK RSP Committee CoChair

JEA negotiations committee chair

JEA District Wide/Alternatives Rep

2015/2016 LEND Fellow

<https://www.facebook.com/alaskalendwithoutwalls/>