September 10, 2026

State of Nevada Board of Health
Office of State Epidemiology
Division of Public and Behavioral Health

SUBJECT: Proposed Changes to NAC 441A, Tuberculosis Risk Screening for School Personnel and Volunteers

Dear Members of the Board of Health,

On behalf of the Charter School Association of Nevada, we are writing regarding the proposed changes to NAC 441A related to tuberculosis screening requirements for certain school employees, contractors, and volunteers.

CSAN supports the goal of protecting student and staff health, and we appreciate that the revised proposal has been narrowed from earlier versions. We recognize the importance of maintaining safe and healthy school environments for students, educators, staff, families, and volunteers.

However, CSAN remains concerned that the regulation could still create an unfunded administrative and operational burden for public charter schools, especially smaller schools with limited staffing and resources. Even as revised, the proposal would require schools to monitor covered individuals, collect documentation, track compliance timelines, and retain records over multiple years. These responsibilities would likely fall on school administrators and office staff who are already managing student services, staffing needs, compliance obligations, and day-to-day school operations.

We are also concerned about the potential impact on volunteers, contractors, and school partners. Public charter schools often rely on parents, families, community members, vendors, and partner organizations to support school events, extracurricular activities, student programs, and campus operations. Additional screening steps or costs could unintentionally discourage participation or delay support for school activities, particularly for individuals who only engage with a school on a limited or occasional basis.

CSAN appreciates the Board's consideration of these concerns and stands ready to work with the Board, the Office of State Epidemiology, and education stakeholders to develop a balanced approach that protects student and staff health without placing undue strain on school budgets, staffing, or volunteer participation.

Sincerely,

Selena Torres-Fossett
Executive Director
Charter School Association of Nevada