

Wisconsin Legislative Council RULES CLEARINGHOUSE

Scott Grosz Clearinghouse Director Margit Kelley Clearinghouse Assistant Director Anne Sappenfield Legislative Council Director

CLEARINGHOUSE RULE 21-077

Comments

[<u>NOTE</u>: All citations to "Manual" in the comments below are to the <u>Administrative Rules Procedures Manual</u>, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

5. Clarity, Grammar, Punctuation and Use of Plain Language

As it is currently written, when comparing evaluations for pre-student teaching and asynchronous student teaching experiences, the term "observation" includes slightly different lists of acceptable sources of information. Specifically, the proposed rule defines "observation" for the purpose of evaluating pre-student teaching experiences may include any of three separate sources: (1) recorded instruction; (2) reviews of lesson plans; and (3) teaching materials that include reflections by the student about what went well with the teaching and learning events and how the student would improve them next time. In contrast, the proposed rule defines "observations" for the purposes of evaluating asynchronous student-teaching experiences, may include any of four separate sources: (1) recorded instruction; (2) reviews of lesson plans; (3) reviews of teaching materials; and (4) reflective discussions about the teaching and learning events.

If the agency intended to create separate lists of acceptable sources of information to be included as observations for evaluations of pre-student teaching experiences and asynchronous student teaching experiences, then no change should be made.

If, however, the agency's intent was for "observations" to be construed similarly for the evaluation of both pre-student teaching experiences and asynchronous student-teaching experiences, the agency could consider using identical language in the relevant portions of both s. PI 34.023 (1) (d) and (2) (h) 1., Wis. Adm. Code.

Additionally, in each of these lists of acceptable observations, recorded instruction and reviews of lesson plans do not appear to require any sort of reflection by the student-teacher. In the list of acceptable observations for asynchronous student-teaching experience, reviews of teaching materials need not be accompanied by reflection.

Specifically, because of the way the sentence is punctuated in the proposed rule for prestudent teaching experiences, only teaching materials must be accompanied by a student-teacher's reflections about the teaching and learning activities to be considered appropriate observations for evaluating the student-teacher's pre-student-teaching experience. Further, the punctuation in the proposed rule for evaluation of asynchronous student-teaching experiences entirely separates reflections, such that a student-teacher's reflection alone could suffice as an observation for the purpose of evaluation.

If the agency intends for recorded instruction, reviews of lesson plans, and reviews of teaching materials all to be accompanied by a student-teacher's reflection, the agency could consider revising the language in similar fashion to the following example: "Observations may include any of the following, accompanied by reflective discussions about the learning and teaching events: recorded instruction, reviews of lesson plans, and reviews of teaching materials."