

Report From Agency
FINAL REPORT
CLEARINGHOUSE RULE 10-083
CHAPTER PI 34
EDUCATOR PREPARATION AND LICENSING FLEXIBILITY

Analysis by the Department of Public Instruction

Statute interpreted: ss. 115.28 (7) (a), 118.19, 118.40 (2r) (a) and (d) 1., and 121.02 (1) (a) 2., Stats.

Statutory authority: ss. 115.28 (7) (a), 118.40 (2r) (a), 121.02 (1) (a) 2., and 227.11 (2) (a), Stats.

Explanation of agency authority:

Section 115.28 (7) (a), Stats., requires the state superintendent to license all teachers for the public schools of the state, make rules establishing standards of attainment and procedures for the examination and licensing of teachers within the limits prescribed in ss. 118.19 (2) and (3), 118.192 and 118.195, and prescribe by rule standards and procedures for the approval of teacher preparatory programs leading to licensure.

Section 118.40 (2r) (a), Stats., requires the department to promulgate rules to define the term “instructional staff” of charter schools established under s. 118.40 (2r), Stats.

Section 121.02 (1) (a) 2., Stats., requires the department to promulgate rules to define the term “instructional staff” in charter schools.

Section 227.11 (2) (a), Stats., gives an agency rule-making authority to interpret the provisions of any statute enforced or administered by it, if the agency considers it necessary to effectuate the purpose of the statute.

Related statute or rule: Section 118.40, Stats.

Plain language analysis:

The department proposes modifying ch. PI 34, Wis. Admin. Code, to provide for educator license flexibility, clarification, and other minor revisions as follows:

Flexibility:

- Allowing institution of higher education (IHE) faculty to supervise clinical students or student teachers if they have experiences other than three years of PK-12 teaching experience.
- Allowing flexibility for students completing their student teaching placement outside the state of Wisconsin.

- Allowing a person holding a professional educator license in language arts (English literature and composition, journalism, speech or broadfield) to get another language arts license at the same developmental level if he or she completes a DPI prescribed exam.
- Allowing a person holding a professional educator license in math or computer science to get a license in math or computer science at the same developmental level if he or she completes a DPI prescribed exam.
- Allowing a person holding a professional educator license in science (physical science, chemistry, physics, earth and space, environmental, biology, or broadfield) to get another science license at the same developmental level if he or she completes a DPI prescribed exam.
- Allowing a person holding a professional educator license in social studies (geography, history, political science, economics, psychology, sociology, or broadfield) to get another social studies license at the same developmental level if he or she completes a DPI prescribed exam.
- Allowing a person holding a professional educator license in foreign language (French, German, Latin, Russian, Spanish, other) to get another foreign language license at the same developmental level if he or she completes a DPI prescribed exam.
- Allowing a person holding a wide-range license (to teach all ages) to add another wide-range license in another subject based on a minor. This provision applies to specific licenses.
- Changing the effective period of educational interpreters, school psychologists, and school guidance counselors licenses from 2 or 3 years to 5 years to give individuals enough time to complete stipulations that in some cases require evidence of successful work experience.
- Requiring that persons teaching in core academic subjects in a charter school have a valid teaching license and one of the following: 1) a major or minor in the assigned subject area, 2) passed an examination prescribed by the department 3) complete a process that verifies content competencies authorized by the department. A school district may continue to request a charter school instructional staff license or permit on behalf of an individual. However, individuals will be required to submit a completed application for the license or permit. In addition, specific information relating to an applicant's specific teaching assignment and his or her qualifications will be required as part of the application process.
- Moving the procedural requirements of requesting a charter school license from ch PI 8 to ch. PI 34 for consistency. These requirements include how to request the license and specifying that the individual must volunteer for the assignment in which the license is being requested. This is required, in part, so that these licenses will not be acquired for an individual without the individual's knowledge.
- Modifying language under the charter permit. A charter permit may be issued to a person assigned to teach in the area of their degree that has not "completed an approved program" as opposed to an already licensed teacher who does "not hold a current license or permit." This subtle change is meant to direct fully licensed teachers that do not meet the new core academic subject license requirements to obtain a one-year emergency license instead of a one-year charter school permit.
- Clarifying that professional educator licenses may be issued to teachers, administrators or pupil services personnel who completed an approved program either in WI or outside the state and have completed 5 years of teaching, pupil services or administrator experience out-of-state corresponding to their license. As currently written, the rules imply that a professional educator license may only be issued to teachers who completed an approved program out of state (rather than instate) and have at least five years of teaching experience out of state.

Clarification/Minor Revisions:

- Eliminating definitions that are not used in the rule and are, therefore, unnecessary .
- Modifying definitions to clarify meaning or intent.
- Defining “core academic subject” to reflect the definition of core academic subject under the federal No Child Left Behind Act (NCLB). Core academic subjects include English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history and geography. The department has further clarified the “arts” as including music, theatre, and dance.
- Changing the phrase “continuous process review” to “continuous review process” throughout the rule for clarification.
- Clarifying that potential nonapproval of an IHE’s professional program leading to licensure will come from the department rather than a department liaison or consultant.
- Replacing the term “teaching practice” with “clinical program” throughout the rule as clinical program is a defined term and should be used consistently .
- Specifying a different effective date/period for licenses issued to mid-term program completers.
- Clarifying that an initial educator license may be issued to an individual who completed an approved program after August 31, 2004 (the date the new program requirements under ch. PI 34 became effective) for the first time in a license category .
- Allowing an initial educator license to be renewed if the individual has not been employed as an educator for at least 3 years (rather than 2) within the 5-year period of issuance.
- Clarifying that out of state teacher applicants may be issued a professional educator license (rather than an initial license) if they meet certain requirements.
- Replacing the term “documentation portfolio” with “professional development plan” and three-member “panel” with “team” as the replacements are the appropriate terms to be used.
- Clarifying that out-of-state applicants may receive an initial educator license in the areas of teaching, pupil services or administration. As currently written the rule appears to only allow for licensure of teachers that apply from out of state and not pupil services or administrator applicants.
- Clarifying when the credits or professional development plan must be completed prior to renewing a professional educator license.
- Clarifying that for applicants eligible to renew a professional educator license by completing 6 semester credits, those credits must be directly related to the license held or to the standards established under subchapter II for teachers, pupil services staff or administrators. As currently written, the rule refers only to the teacher standards.
- Removing the provisions relating to issuing a license based on equivalency or experience from the initial educator license section and creating a new section for these provisions. As currently written, the rules imply that a license based on equivalency or experience may only be issued as an initial educator license.
- Clarifying that in order to extend an emergency and charter school permit, the applicant must complete at least 6 semester credits or equivalent coursework toward completion of an approved program in the subject or pupil services area of the emergency permit.
- Eliminating throughout the rule the list of “strands” which list specific subject requirements that must be completed in order to receive a license. Instead of listing strands, the rule will refer to the state’s model academic

standards which will include the specific subject area requirements. Wisconsin is one of 48 states that have agreed to adopt a common set of standards for various subject areas.

- Clarifying that a program coordinator license is needed for individuals serving as career and technical education program coordinators.
- Clarifying that a person must have a professional educator license before being eligible for an administrator license.
- Clarifying that a person must complete a clinical program to receive a license as a coach, gifted and talented instructor, library media specialist or reading teacher.
- Creating language regarding virtual charter school licenses that mirrors statutory language.
- Updating application provisions and providing additional renewal options relating to educational interpreter deaf and hard of hearing licenses to better reflect current practice.
- Eliminating references to obsolete licenses (education for employment and local vocational education coordinator) that are no longer issued. It should be noted that although new licenses in these areas are no longer issued, any such valid licenses issued prior to the effective date of this rule are still effective and may be renewed.

Summary of, and comparison with, existing or proposed federal regulations:

The federal No Child Left Behind (NCLB) Act requires 100 percent of public school teachers to be highly qualified in “core academic subjects” which are defined as English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, music, art, theatre, dance, history and geography .

On June 3, 2008, the department notified all public schools, including charter schools, that in order to be considered highly qualified in the core academic subjects, an individual must 1) hold a valid teaching license in that subject or 2) hold any valid teaching license with a major or minor or passed the Praxis II content exam in the assigned core academic subject. The proposed rule codifies the requirements in that notice and provides a third option that the notice did not – that an individual complete a process authorized by the department that verifies content competencies. Formerly a charter school license was issued based solely on whether the applicant held any kind of teaching license; not subject-matter expertise. As a result, it is quite possible that holders of Wisconsin’s former charter school instructional staff license were not considered highly qualified under the NCLB.

Comparison with rules in adjacent states:

Illinois:

- Common core state standards initiative. Illinois is one of 48 states that have agreed to adopt a common core of state standards for various subject areas.
- Core subject areas. Illinois lists the same core subject areas listed in this rule and further defines “fine arts” as including dance, drama, music and visual arts.
- Charter school teacher requirements in core subject areas. To teach a core subject, teachers must do one of the following: pass a content area test specific to the subject, complete a major or equivalent in the subject, hold a master’s or higher degree in a field directly related to the subject, hold a National Board for Professional Teaching Standards (NBPTS) or an Illinois master certificate or qualify under a point system. Teachers in charter schools

must either meet the above requirements or hold a bachelor's degree, passed the relevant content-area test in each core subject area of teaching responsibility and meet other requirements of Section 27A -10(c) of the School Code.

- Additional subject area licenses based on taking a test. A teacher can receive an endorsement in a foreign language by taking a test, with no coursework. Currently, a science or social science designation may be added by taking the test only, if the individual currently holds either an old narrow field or a broad field designation.
- License based on experience or equivalency. None.

Iowa:

- Common core state standards initiative. Iowa is one of 48 states that have agreed to adopt a common core of state standards for various subject areas.
- Core subject areas. Iowa defines core content standards as English and language arts, mathematics, science, social studies, and 21st century learning skills. The latter includes civic literacy, health literacy, technology literacy, financial literacy, and employability skills.
- Charter school teacher requirements in core subject areas. Iowa requires the licensure/certification of teachers in charter schools to be identical to those of all other public school teachers.
- Additional subject area licenses based on taking a test. Iowa does not offer state approved exams and requires an individual to finish regionally accredited coursework to add an endorsement.
- License based on experience or equivalency. None.

Michigan:

- Common core state standards initiative. Michigan is one of 48 states that have agreed to adopt a common core of state standards for various subject areas.
- Core subject areas. Michigan defines core academic curriculum content standards as follows: "Recommended model core academic curriculum content standards shall be developed and periodically updated by the state board, shall be in the form of knowledge and skill content standards that are recommended as state standards for adoption by public schools in local curriculum formulation and adoption, and shall be distributed to each school district in the state. The recommended model core academic curriculum content standards shall set forth desired learning objectives in math, science, reading, history, geography, economics, American government, and writing for all children at each stage of schooling and be based upon the "Michigan K-12 program standards of quality".
- Charter school teacher requirements in core subject areas. Michigan considers charter schools to be public schools. Therefore, the same certification laws apply to charters in the same fashion as any other public school. In essence, charter school teachers are required to hold a valid teaching certificate with endorsement in the subjects to which they are assigned to teach.
- Additional subject area licenses based on taking a test. Michigan requires an individual to complete a state approved endorsement program to receive licensure in an additional subject area.

- License based on experience or equivalency. Michigan has new legislation providing for *alternative route certification*. Prerequisites must be met, including passage of the Michigan Test for Teacher Certification basic skills and content examinations before admission to the alternate route program is granted.

Minnesota:

- Common core state standards initiative. Minnesota is one of 48 states that have agreed to adopt a common core of state standards for various subject areas (except math).
- Core subject areas. Minnesota defines core academic subjects as language arts; mathematics; science; social studies, including history, geography, economics, and government and citizenship; health and physical education; and the arts.
- Charter school teacher requirements in core subject areas. Minnesota requires the licensure/certification of teachers in charter schools to be identical to those of all other public school teachers.
- Additional subject area licenses based on taking a test. Minnesota allows teachers in only the science subjects to get another science license based on taking a state approved test.
- License based on experience or equivalency. Minnesota has an active portfolio review process. Applicants must pay a \$500 fee. Also, applicants must have taught in the area of discipline and demonstrate competency standards.

Summary of factual data and analytical methodologies:

Chapter PI 34 contains the requirements an individual must meet to be licensed as an educator in Wisconsin. It replaced Chapters PI 3 (containing the requirements an individual must meet to be licensed) in 2004 and PI 4 (containing the procedures and standards for approval of professional education programs leading to licensure) in 2000. Chapter PI 34 advanced licensure and educator preparation programs to be standards-based and competency-based rather than credit-based.

Since the passage of Chapter PI 34 ten years ago, changes in teaching, learning, and instructional delivery require further modification to Wisconsin’s licensure and educator preparation criteria. Also, modifications need to be made to clarify certain requirements. There is an increasing need for flexibility in licensure to allow rural schools to offer a full range of education offerings to students and allow teachers to more easily obtain licensure in other subjects while meeting the highly qualified teacher provisions under the federal No Child Left Behind Act.

These proposed changes aim to provide more tools to schools and flexibility to educators that at the same time ensure educator quality.

Analysis and supporting documents used to determine effect on small business or in preparation of economic impact report: N/A.

Anticipated costs incurred by private sector: N/A.

Effect on small business:

The proposed rules will have no significant economic impact on small businesses, as defined in s. 227.114 (1) (a), Stats.

Agency contact person: (including email and telephone)

Deborah Mahaffey, Assistant State Superintendent, Division for Academic Excellence, deborah.mahaffey@dpi.wi.gov or 608/266-3361.

Place where comments are to be submitted and deadline for submission:

The administrative rule and fiscal note are available on the internet at <http://dpi.wi.gov/pb/rulespg.html>. A copy of the proposed rule and the fiscal estimate also may be obtained by sending an email request to lori.slauson@dpi.wi.gov or by writing to:

Lori Slauson, Administrative Rules and Federal Grants Coordinator
 Department of Public Instruction
 125 South Webster Street
 P.O. Box 7841
 Madison, WI 53707

Written comments on the proposed rules received by Ms. Slauson at the above mail or email address no later than August 9, 2010, will be given the same consideration as testimony presented at the hearing.

Public hearings to consider the proposed rule were conducted by the department on July 23 and August 4, 2010, in Madison and Chippewa Falls, respectively. Persons were asked to register in favor, generally in favor (except for . . .), against, generally against (except for . . .), or for information only.

Madison Hearing, July 23, 2010

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
None				

Chippewa Falls Hearing, August 4, 2010

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Allison Kunkel	Wi Branch of International Dyslexia Assoc			X
Jill Prushiek	UW-Eau Claire	X		
Tina Trumbower	Wis Business Education Assoc	X		
Paul Tweed	Augusta School District	X		

The following persons submitted written testimony:

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Peter J. Burke	Self			X
Pamela R. Clinkenbeard, Phd	Self			X
John Gee	Wis Charter Schools Assoc	X		
Mike Harris	Self			X
Darah A. Kasprowicz	Wis Assoc for Talented and Gifted			X
Patricia Shaw	Self	X		
Mark Stensvold, PhD	Self			X
Cheryl Ward	Self			X

Summary of public comments relative to the rule, the agency's response to those comments, and changes made as a result of those comments:

Comments – The general teaching license now available to elementary teachers should be extended to middle school teachers.

Discussion – This is already the case with, for example, the middle childhood-early adolescence-regular education license.

Changes – None.

Comments – The tests developed that allow teachers to become licensed in additional subjects need to be reasonable in terms of rigor and length and expense to teachers or schools.

Discussion – Validating discrete tests in each of the areas of language arts (English literature and composition, journalism, & speech), mathematics (or computer science), science (physical science, chemistry, physics, earth and space, environmental, & biology), and social studies (geography, history, political science, economics, psychology, & sociology). Currently, an individual takes a broadfield test in language arts, science or social studies to receive a specific license within that subject. The costs related to examination validation are indeterminate but will likely be absorbed by the agency. The validation process will address the rigor and length concerns stated above. It is assumed that the testing vendor will develop the discrete examinations at no cost to the department but may charge a fee to persons taking the test. The fee to be charged is unknown.

Changes – None.

Comments – Will new tests be developed for additional licensure in each of the areas of science, social studies, foreign language, etc., or will the department use the existing broadfield test?

Discussion – New tests specific to the content area will be developed and validated as described above.

Changes – None.

Comments – The Wisconsin Charter School Association (WCSA) encourages the department to work cooperatively with the WCSA and other groups to implement an assessment process.

Discussion – The department has and will continue to work with various groups regarding an assessment process.

Changes – None.

Comments – Request that teachers who currently hold a charter school license be grandfathered.

Discussion – The federal No Child Left Behind (NCLB) Act requires 100 percent of public school teachers to be highly qualified in “core academic subjects” which are defined as English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, music, art, theatre, dance, history and geography. Formerly a charter school license was issued based solely on whether the applicant held any kind of teaching license; not subject-matter expertise. As a result, it is quite possible that holders of Wisconsin’s former charter school instructional staff license were not considered highly qualified under the NCLB, and thus, cannot be grandfathered into this rule. However, the option to obtain a charter school license under s. PI 34.34 (1) (b) 3., provides an opportunity for charter school teachers to have their experience teaching in a charter school recognized.

Changes – None.

Comments – Encourage the department to establish a prototype program for allowing charter school teachers to earn a multidisciplinary STEM license or a multidisciplinary humanities license.

Discussion – The department is interested in working with charter schools and others to address teacher multidisciplinary STEM instruction. Discussions related to STEM, project lead the way and project-based teaching assignments are ongoing. More substantial changes may be made in the future but not at this time.

Changes – None.

Comments – Virtual charter schools are treated differently than non-virtual schools inasmuch as there is no flexibility offered. Virtual charter schools should have the same licensing flexibility afforded teachers in other types of charter schools.

Discussion – Virtual charter school license requirements are specified under s. 118.40 (8) (b), Stats. The rule cannot contradict statutory language by providing flexibility that is not allowed.

Changes – None.

Comments – Under s. PI 34.30(2)(L)4, the accreditation standards should be from the “Council for Academic Accreditation in Audiology and Speech-Language Pathology” rather than the “American Speech-Language-Hearing Association.”

Discussion – The department does not believe there is a need to address Council for Academic Accreditation in Audiology and Speech-Language Pathology and that the American Speech-Language-Hearing Association requirements are appropriate.

Changes – The word “accreditation” has been deleted under s. PI 34.30(2)(L)4.

Comments – The department should consider “grandfathering” individuals for the gifted teacher and gifted coordinator licenses.

Discussion – This license is not required. Therefore, grandfathering provisions are not necessary.

Changes – None.

Comments – Those with experience teaching gifted and talented (GT) students or coordinating district GT programs should be able to submit documentation of their experience rather than enrolling in a clinical program for GT.

Discussion – The clinical requirement should already be part of the program but could occur on-the-job, when applicable.

Changes – None.

Comments – Under s. 34.33(5g)(a), relating to GT licensure, add “including those from diverse populations.”

Discussion – These rules were developed to provide for educator license flexibility, clarification and other minor revisions. This comment is outside the scope of the proposed rule.

Changes – None.

Comments – Under s. PI 34.33(5g)(h), replace “the Wisconsin gifted model” with “recommended models of gifted education.”

Discussion – Recommended accepted.

Changes – Under s. PI 34.33 (5g) (h), the phrase “Wisconsin gifted education model” has been replaced with the phrase “recommended models of gifted education.”

Comments – The department should allow additional flexibility to a person that holds a professional license in special education by allowing that person to add another area of special education (emotional behavioral disability, learning disability, and cognitive disability) by taking a test.

Discussion – These rules do not address special education certification. This comment is outside the scope of the proposed rule.

Changes – None.

Comments – The cross-categorical special education license is too generic and does not adequately train the educator to serve the needs of students with reading problems.

Discussion – These rules do not address special education certification. This comment is outside the scope of the proposed rule.

Changes – None.

Comments – It is not clear whether the college minor that allows an individual to receive a wide-range license would be approved by the program or the department.

Discussion – An educator preparation program that has an approved program leading to a license in these areas would endorse for this licensure.

Changes – The last sentence of s. PI 34.30 (2) (intro) has been modified for clarity.

Comments – Under s. PI 34.01 (15), the use of “continuous process review” was meaningful. It put the emphasis on the fact that the department review of collegiate programs was to be a “process” not an “event.” Changing this

wording focuses the procedure more on the “review” part rather than the evaluative components of a continuous process.

Discussion – The use of “continuous process review” was understood when the rule was first developed 10 years ago, but now, for the most part, is misunderstood. Most are confused by the phrase. “Continuous review process” has the same meaning and is still considered a “process” and not an “event.”

Changes – None.

Comments – Under s. PI 34.05 (4), what does the word “comparable” mean in this context. Further, the sentence structure indicates that the accreditation agency meets the requirements, not the college.

Changes – Section PI 34.05 (4) has been modified for clarity.

Comments – Whatever happened to the need to combine English as a second language (ESL) with Bilingual?

Discussion – These rules were developed to provide for educator license flexibility, clarification and other minor revisions. This comment is outside the scope of the proposed rule.

Changes – None.

Comments – The department should create language that would allow experienced school business officials who came through the non-teaching route to qualify for a superintendent license.

Discussion – These rules were developed to provide for educator license flexibility, clarification and other minor revisions. This comment is outside the scope of the proposed rule.

Changes – None.

Comments – Under s. PI 34.30 (2) L, include a specific reference to dyslexia as a language disorder for which training must be obtained in order to receive a speech and language pathology license.

Discussion – These rules were developed to provide for educator license flexibility, clarification and other minor revisions. This comment is outside the scope of the proposed rule.

Changes – None.

Comments – Align standards for early childhood, early childhood to middle childhood, and reading specialist to address knowledge and practice standards for teachers of reading.

Discussion – These rules were developed to provide for educator license flexibility, clarification and other minor revisions. This comment is outside the scope of the proposed rule.

Changes – None.

Comments – Will the institutions of higher education (IHEs) and respective universities be responsible for determining IHE faculty to supervise clinical students or student teachers if they have experiences other than three years of PK-12 teaching experience?

Discussion – If the faculty member does not have 3 years PK-12 experience, the department will establish an equivalency process that shall be used by the IHEs.

Changes – None.

Comments – Currently to add-on ESL, it matches the initial license unless students complete an entire major in ESL. It is recommended that schools that offer ESL minors be allowed to license students in broader developmental age ranges than their initial license.

Discussion – The proposed rules do allow an educator to add ESL based on a minor at the early childhood through adolescence level under certain circumstances. It does not address adding a developmental age range license that is broader than the initial license. This is outside the scope of the proposed rule.

Changes – None.

Comments – Section PI 34.195(1)(a) carries the old language “. . . meets all of the requirements of this chapter.” Section (2) has the language “. . . meets all of the applicable requirements of this chapter.” The latter should be used in both paragraphs.

Discussion – Agreed.

Changes – The word “applicable” has been added to s. PI 34.195(1)(a).

Changes made as a result of oral or written testimony: See above.

Changes to the analysis or the fiscal estimate: The acronym “IHE” was replaced by the phrase “institution of higher education (IHE).”

Responses to Clearinghouse Report:

2. Form, Style and Placement in Administrative Code:

a. Recommendation accepted, changes made.

b. Recommendation accepted, changes made.

c. Recommendation accepted, changes made.

d. In several places in the rule-making order, the treatment clause is written to broadly affect a section so the reader can clearly see the changes made and the provisions that will remain. Although it is not proper drafting style, it was done to benefit the reader as the teacher licensure rule is complicated and often contentious.

e. Recommendation accepted, changes made.

f. Recommendation accepted, changes made.

g. Recommendation accepted, changes made.

4. Adequacy of References to Related Statutes, Rules and Forms:

a. Recommendation accepted, changes made.

b. Recommendation accepted, changes made.

c. Recommendation accepted, changes made.

d. Recommendation accepted, changes made.

5. Clarity, Grammar, Punctuation and Plainness:

a. Recommendation accepted, changes made.

b. Recommendation accepted, changes made.

c. Recommendation accepted, changes made. Also, “regional accrediting agency” and “regional college accreditation agency” has been replaced with “regional institutional accreditation agency.”

d. Recommendation accepted, changes made.

e. Recommendation accepted, changes made.

f. Recommendation accepted, changes made.

g. Recommendation accepted, changes made.

h. The phrase “if he or she volunteers for the assignment” will ensure that the teacher participates in the application process.

i. Recommendation accepted, changes made.

j. The electronic version of s. PI 34.34(3)(a)4.b. references “DHS.” Therefore, the reference to DHS in the rule is correct.

k. Recommendation accepted, changes made.

l. Recommendation accepted, changes made.

m. Recommendation accepted. Section PI 34.34(4)(c) has been repealed.

FINAL REGULATORY FLEXIBILITY ANALYSES

Summary of Final Regulatory Flexibility Analysis:

The proposed rules will have no significant economic impact on small businesses, as defined in s. 227.114(1)(a), Stats.

Summary of Comments:

No comments were reported.