

April 17, 2018

The Honorable Jeremy Thiesfeldt
Room 16 West
State Capitol
Madison, WI 53708

The Honorable Luther Olsen
Room 313 South
State Capitol
Madison, WI 53707-7882

Representative Thiesfeldt and Senator Olsen:

The department is submitting germane modifications to PI 34, related to educator preparation and licensure, as allowed under Wis. Stats. 227.19 (4) (b) 3. The modifications represent changes to address drafting errors related to grammar, numbering and content. They are listed below. Attached you will find the revised PI 34 with the germane modifications included. I have copied the Assembly and Senate Chief Clerks on this letter as well, so they are aware of these modifications.

The amended changes are noted below.

- 1) Changes to address grammatical and spacing issues.
 - a. Heading: **Subchapter II – Educator Standards**
 - b. Heading: **Subchapter IV – Program support**~~Support~~
 - c. Heading: **Subchapter VI – Teaching Areas**
 - d. Heading: **Subchapter VII – Pupil services**~~are as~~ **Services Areas**
 - e. **PI 34.086 (2) (b)** Completed of a practicum of at least 150 hours in grades pre-kindergarten through grade 12 with a licensed educational interpreter assigned as a mentor. Completion shall be verified by a representative from a higher education interpreter training program or the school district administrator where the practicum took place.
 - f. **PI 34.086 (3) (b)** Completed of a practicum of at least 150 hours in grades pre-kindergarten through grade 12 with a licensed educational interpreter assigned as a mentor. Completion shall be verified by a representative from a higher education interpreter training program or the school district administrator where the practicum took place.
 - g. **PI 34.086 (5) (b) 1.** Passes the Educational Interpreter Performance Assessment with a renewal score set by the state superintendent in consultation ~~from~~with the superintendent's advisory council on deaf and hard of hearing programs.
 - h. Heading: **Subchapter XI – Professional misconduct**~~Misconduct~~
 - i. Heading: **Subchapter XII – Additional provisions**~~Provisions~~
- 2) Changes to address drafting errors in numbering.

The numbers in these sections were not updated to reflect renumbering done as a result of changes made due to public comment.

 - a. **PI 34.028 (4)** Subject to s. PI 34.042~~34.039~~, a license issued under this section may be renewed as follows:

- b. **PI 34.029 (3) DURATION.** Except as provided under s. PI ~~34.042~~34.039, a license issued under this section is valid for 3 years.
 - c. **PI 34.030 (1) AUTHORIZATION.** A license issued under this section authorizes the license holder to teach in the subject area and grade level of the license. The subject area and grade level of the license shall be determined by the state superintendent based on all of the following:
 - (a) The course work shown on the applicant's transcripts used as part of the institutional endorsement or the credential evaluation by an international credential evaluation agency. The international credential evaluation agency shall be approved by the state superintendent.
 - ~~(a)~~ **(b)** The subject areas and grade levels of the license granted to the applicant by another country.
 - ~~(b)~~ **(c)** The applicant's professional experience.
 - d. **PI 34.030 (2) (c)** The applicant's employing school district agrees to provide the applicant the mentoring required under s. PI ~~34.043 (5) (e)~~34.040 (5).
 - e. **PI 34.039 (2)** A school employing a tier I license holder in special education shall meet the requirements under s. PI ~~34.043~~34.040 (5) and 34 CFR 300.156 (c).
 - f. **PI 34.052 (2) EARLY CHILDHOOD.** An individual holding an elementary and middle school license under s. PI ~~34.045~~34.045, a special education license under s. PI 34.049, or an equivalent license may add the early childhood education license area under PI 34.044 by meeting all of the following requirements:
- 3) Changes to address drafting errors in content.
- a. **PI 34.018 (4) (b) 1.** A minimum cumulative grade point average of ~~2.75~~3.0 on a 4.0 scale.
Reason: 3.0 is the grade point average currently required and the grade point in the rule that was out for public comment. No comment was received to change the grade point average.
 - b. **PI 34.040 (2) (h) Standards-based training and assessment.** The applicant successfully completed a standards-based training and assessment program approved by the state superintendent and passed the assessments approved under s. PI 34.021.
Reason: The words "and assessment" are in the current rule and were not meant to be dropped from the proposed revision. No comment was received requesting the terms be dropped.
 - c. **PI 34.041 (2) (b)** The applicant completed at least 6 semesters of experience in the ~~subject~~license area ~~or position~~ of the tier II license. The 6 semesters of experience shall be in one or more Wisconsin public schools within the 5 years immediately preceding the effective date of the license issued under this section.
Reason: The rule refers to license areas rather than subject areas or positions.
 - d. **PI 34.041 (3) (b)** The license holder does not meet the requirements under sub. (4). The state superintendent shall restore a license that becomes invalid under this paragraph if the license holder obtains a satisfactory background check under sub. (4) within 180 days of the license being invalidated.
Reason: The word "not" was inadvertently left off. Adding the word back in ensures the intent of the provision, which is to invalidate licenses of those who have not submitted the required background check.
 - e. **PI 34.042 (1) AUTHORIZATION.** A tier IV license issued under this section authorizes an individual to teach or work in the license area specified under subch. VI, VII, ~~or VIII~~or IX.
Reason: These supplemental licenses were not meant to have been excluded from getting a master educator license available under this tier.

- f. **PI 34.052 (2) (a)** Have at least 4 semesters of classroom teaching experience in prekindergarten through grade 23. The teaching experience may include teaching in a Head Start program.

Reason: This is a cross-referencing correction as the early childhood license referenced here goes through grade 3 under the rule.

- g. **PI 34.052 (2) (b), (3) (b), (4) (intro.), (5) and (6)**

(2) (b) Have a passing score on a content knowledge test approved by the state superintendent ~~under s. PI 34.021 (1) (e).~~

(3) (b) Passing the applicable content knowledge test approved by the state superintendent ~~under s. PI 34.021 (1) (e).~~

(4) ADDITIONAL MIDDLE AND HIGH SCHOOL SUBJECT AREAS. An individual holding a middle and high school license under s. PI 34.046, a special education license under s. PI 34.049, a prekindergarten through 12 license under ss. PI 34.047 (3) (a) through (l) or (n) through (p), or an equivalent license, may add one of the following additional middle and high school subject areas by passing the applicable content knowledge test approved by the state superintendent ~~under s. PI 34.021 (1) (e):~~

(5) ADDITIONAL PREKINDERGARTEN THROUGH 12 SUBJECT AREAS. An individual holding a prekindergarten through 12 license under ss. PI 34.047 (3) (a) through (l) or (n) through (p), or an equivalent license, may add additional prekindergarten through 12 subject areas under ss. PI 34.047 (3) (a) through (l) or (n) through (p) by passing the applicable content knowledge test approved by the state superintendent ~~under s. PI 34.021 (1) (e).~~

(6) ENGLISH AS A SECOND LANGUAGE AND WORLD LANGUAGES. An individual holding an elementary and middle school license under ss. PI 34.045, a special education license under s. PI 34.049, or an equivalent license may add a license in English as a second language or a world language by passing the applicable content knowledge test approved by the state superintendent ~~under s. PI 34.021 (1) (e).~~

Reason: PI 34.021 is an inaccurate cross-reference as the licenses under 34.052 are for additional add on licenses, and are separate from those tests approved for program approval purposes under PI 34.021 for program approval.

- h. Headings:

- i. **Subchapter VIII – Administration ~~Categories~~ Areas**
- ii. **Subchapter IX– Supplementary ~~Categories~~ Areas**
- iii. **Subchapter X – Related ~~services licenses and other licenses.~~ Services Areas and Other Licenses**

Reason: For consistency purposes all license areas were meant to be referred to as “areas”, not “categories”. This terminology change does not change any license requirements.

- i. **PI 34.065 (4) (a) and (b)**

(4) (a) The applicant has 6 semesters of successful, ~~full-time~~ classroom experience teaching in any grade.

(4) (b) The applicant has 6 semesters of successful, ~~full-time~~ experience as a school counselor, school psychologist, or a school social worker, and the applicant has at least 540 hours of successful classroom teaching experience.

Reason: The term “full-time” is not in the recently signed 2017 Wisconsin Act 206.

- j. **PI 34.086 (3) (a) 1.** A sign language interpreter ~~115~~151-150 license issued by the Wisconsin department of safety and professional services.

Reason: There is a 151, but not a 115 license for this area.

- k. **PI 34.086 (3) (a) 2. f.** Certified deaf interpreter or deaf interpreter.

Reason: This certification should have been on the list as it is recognized by the National

- Registry and recommended by stakeholders.
- l. **PI 34.086 (5) (a) 2.** Completes 7.5 continuing education units approved by the Registry of Interpreters for the Deaf or Board for Evaluation of Interpreters. A licensee can satisfy 3 continuing education units by serving as a mentor under sub. (2) (b) or (3) (b).
Reason: The department should have included this additional board as recommended by stakeholders.
 - m. **PI 34.088 (2) (a)** Meets the requirements under s. PI 34.086 (2) (a) but does not meet the requirements under s. PI 34.086 (2) (b) or ~~(d)~~(c).
Reason: There is no (d). This was supposed to be a reference to (c).
 - n. **PI 34.089 (4) RENEWAL.** A license issued under this section ~~is renewable if the licensee is certified by the Academy for Certification of Vision Rehabilitation and Education Professionals~~ may be renewed if the licensee meets one of the following requirements:
(a) Certification from the Academy for Certification of Vision Rehabilitation and Education Professionals.
(b) Completion of 6 semester credits from an accredited institution of higher education.
Reason: The department should have included the additional option that exists under current law of 6 semester credits for renewal as not all licensees are certified by the entity in (a).
 - o. **PI 34.090 (title) and (3)** (please note the “4” in both sections are struck out)
PI 34.090 School audiologist, 45-year renewable license.
(3) DURATION. A license issued under this section is valid for 45 years.
Reason: Renewals for this license have always been for 5 years. There was no request for a change and the department did not intend to have a more frequent renewal cycle for this license.
 - p. **PI 34.094 (2) ELIGIBILITY.** The state superintendent may issue a school physical therapist assistant license under this section to an applicant who has graduated from a physical therapist assistant associate degree program accredited by the ~~American physical therapy association~~ Commission on Accreditation in Physical Therapy Education.
Reason: The name of the Commission was listed incorrectly.
 - q. **PI 34.109 (2) (a)** A license issued under subch. VI, VII or VIII.
Reason: The department inadvertently left these references off. This correction restores the ability of administrators and pupil services licensed individuals to serve as short-term substitutes, something they can do under current law.

Please contact Jennifer Kammerud in my office if you have any questions. She can be reached at Jennifer.kammerud@dpi.wi.gov or at (608) 266-7073.

Sincerely,

Mike Thompson, PhD
Deputy State Superintendent

MT/cb

cc: Erin Gillitzer
Kay Inabnet