

Report From Agency

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

In the matter of rulemaking to update the Wisconsin Administrative Code
Chapter PI 34 for EDUCATOR LICENSES

Clearinghouse Rule No. CR 25-024: COOPERATING TEACHERS AND SCHOOL-BASED SUPERVISORS

REPORT TO LEGISLATURE

I. Basis and Purpose of the Proposed Rule

The proposed rule change is a technical correction to ch. PI 34 of the Wisconsin Administrative Code intended to clarify the requirements for cooperating teachers and school-based supervisors participating in the clinical components of educator preparation programs. Under current rule, an educator preparation program's conceptual framework must include a clinical program that utilizes cooperating teachers and school-based supervisors who hold a valid Wisconsin license, or an equivalent license if the clinical program is located outside of Wisconsin. Specifically, the rule amends s. PI 34.023 (4) (a), Wis. Admin. Code, to state that cooperating teachers and school-based supervisors must hold a valid tier II, III, or IV license in the subject or position aligned with their area of supervision.

II. Public Hearing Summary

The hearing notice was published in the May 27, 2025, edition of the Wisconsin Administrative Register. A public hearing was held on June 10, 2025.

No persons testified at the hearing to provide testimony. However, the following persons submitted written testimony:

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Wendy Kropid	University of Wisconsin-Superior			X
Stacy Furness	University of Wisconsin-River Falls			X

III. Summary of Public Comments to the Proposed Rule and the Agency's Response to those Comments

- Two respondents emphasized the need for greater flexibility in the proposed rule regarding qualifications for cooperating teachers and on-site supervisors. They note that educator preparation programs frequently rely on out-of-state placements and recommended including language such as "or equivalent" to accommodate licensure from other jurisdictions. For example, in certain licensure areas—such as Agricultural Education—it may be difficult to find individuals with Tier II or higher licenses, making it important to allow license-by-experience or other alternatives. Commenters expressed concern that rigid requirements could make it difficult, particularly in rural school districts, to identify qualified cooperating teachers, especially when only one individual in the district holds a relevant position under a license with stipulations (LWS). They requested exceptions be provided in the

rule when all reasonable attempts to identify Tier II or higher license holders have been exhausted. Additionally, concerns were raised about the requirement that cooperating teachers or supervisors have at least one year of experience at their current place of employment, as this may disqualify otherwise experienced cooperating teachers. Suggestions included removing or softening that requirement and allowing a placement site's recommendation to substitute for it. Commenters also proposed clearer alternatives for situations where ideal criteria cannot be met, including the use of experienced administrators (e.g., principals or directors) in supervisory roles or a team-based model when no single individual meets all criteria. Ultimately, while the clarifications in the rule are welcomed, respondents stressed the importance of maintaining practical flexibility to ensure clinical experiences remain accessible, especially for candidates completing licensure while employed under LWS placements in high-need or hard-to-staff areas.

Agency Response: In response to comments requesting the inclusion of experience-based license holders or Tier I licensed educators as cooperating teachers, the department affirms the importance of ensuring candidates are supported by cooperating teachers who possess both a strong foundation in pedagogy and a comprehensive understanding of Wisconsin's educator standards. Cooperating teachers are required to hold a Tier II, III, or IV license because these licensure tiers signify that the individual has completed formal preparation in instructional methods, professional responsibilities, content area standards, and strategies for meeting diverse student needs. In contrast, experience-based and Tier I licenses are granted based on limited coursework, professional development, or field experience, without the pedagogical training required for effective teacher mentorship. These licenses are non-portable and require the employing school district to provide additional training and support to the license holder. Therefore, individuals holding only a Tier I license are not qualified to serve in the critical role of cooperating teacher, as they do not possess the requisite preparation to effectively mentor and evaluate teacher candidates. For these reasons, no changes were made to the proposed rule as a result of these comments.

IV. Changes to the Rule Summary or Fiscal Estimate/Economic Impact Analysis

Rule Summary:

No changes were made.

Fiscal Estimate/Economic Impact Analysis:

No changes were made.

V. Department Response to Legislative Council Rules Clearinghouse Report:

5. Clarity, Grammar, Punctuation and Plainness:

- a. Additional language has been added to the explanation of agency authority section of the proposed rule.
- b. This change has been accepted.
- c. The agency replaced the word "employed" with the word "used" in the plain language analysis section of the proposed rule to better convey the correlation between cooperating teachers and the clinical program. The voluntary nature of the position refers to a teacher's agreement to serve in the role and is not intended to refer to any contemplated compensation or employment status.

- d. While a definition of “cooperating teacher” is not provided, the requirements needed to act as a cooperating teacher are described fully in PI 34.023 (4), Wis. Admin. Code. A definition is unnecessary, as it would restate the language already contained in the rule; a school-based supervisor is a role within a teacher preparation program that is inherently part of the program’s structure, making a definition redundant for the purposes of the proposed rule.