

ADMINISTRATIVE RULES

Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected		2. Date
3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) Chapter PI 34, Educator Licenses		
4. Subject Recognizing national certification for school counselor and school social worker licensure		
5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S		6. Chapter 20, Stats. Appropriations Affected
7. Fiscal Effect of Implementing the Rule <input checked="" type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input type="checkbox"/> Could Absorb Within Agency's Budget		
8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses (if checked, complete Attachment A)		
9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137 (3) (b) 1., Stats. \$0		
10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137 (3) (b) 2., Stats.? <input type="checkbox"/> Yes <input type="checkbox"/> No		
11. Policy Problem Addressed by the Rule The objective of the proposed rule will be to recognize national school counseling and school social work certification for the licensing of school counselors and school social workers under ch. PI 34, Wis. Admin. Code. Specifically, it recognizes certifications from national organizations such as the School Social Work Association of America, the National Association of Social Workers for school social workers, and the National Board for Professional Teaching Standards, the National Board for Certified Counselors, and the American School Counselor Association for school counselors as eligible to receive Tier II licensure.		
12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments The department held a preliminary public hearing and comment period on the scope statement for the proposed rule. As provided in the hearing notice, any comment received during the preliminary public hearing and comment period are also considered for the development of this economic impact analysis. However, the comments received did not pertain to the economic impact of the proposed rule and, as such, were not included in the formulation of this analysis.		
13. Identify the Local Governmental Units that Participated in the Development of this EIA None.		
14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) State: The proposed rule is anticipated to have a minimal direct fiscal impact on the state. Increasing the entry of qualified professionals into Wisconsin's educational system could help address staffing shortages, particularly in school counseling and social work positions, without necessitating state resources to support this change. However, any long-term fiscal effects would depend on factors such as changes in workforce demographics and the extent to which the rule influences the supply of licensed professionals in the state.		

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Local:

The proposed rule is anticipated to have a minimal direct fiscal impact on local school districts but may generate positive indirect benefits. By recognizing national certifications as valid pathways to licensure for school counselors and school social workers, the rule can expand the pool of qualified candidates available to districts, particularly those in rural or high-need areas. This could reduce the time and cost associated with prolonged vacancies and repeated recruitment efforts. Additionally, nationally certified professionals often enter the workforce with high levels of preparation, potentially lowering onboarding and training costs for districts. While the rule imposes no new mandates or requirements on local entities, its facilitation of streamlined hiring processes may enhance student support services over time by improving access to mental health and counseling resources. As such, the local fiscal impact is expected to be minimal.

15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule

To address critical shortages in these licensing areas, the proposed changes to ch. PI 34.040 (2), Wis. Admin. Code, recognize national certification as a qualification to receive a tier II license to work as a school counselor or a school social worker. The proposed rule will extend the same flexibility currently available to nationally certified school psychologists and school nurses under the rule. Without a rule change, the department would be required to implement ch. PI 34, Wis. Admin. Code, as the rules currently exist, and licensing applicants must adhere to existing pathways outlined in the current rule.

16. Long-Range Implications of Implementing the Rule

The proposed rule is expected to strengthen Wisconsin's educational workforce by expanding licensure pathways for nationally certified school counselors and school social workers, thereby improving the state's ability to attract and retain qualified professionals. By aligning state requirements with national standards, the rule supports a more flexible and responsive licensure system for school social workers and school counselors. This, in turn, can enhance student access to essential support services, positively impacting academic achievement, mental health, and school climate. The recognition of national certification also promotes professional development and workforce stability, contributing to sustained improvements in educational outcomes and equity across Wisconsin schools.

17. Compare With Approaches Being Used by Federal Government

Because educator licensure in the United States is typically governed by each state and local government, federal regulations are generally silent with respect to the issuance of teacher licenses. As a result, the requirements for licensure vary by state.

18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

Illinois: In Illinois, school social workers must obtain a Professional Educator License (PEL) with a School Social Worker Endorsement. While national certification is not a stand-alone pathway, short-term licensure may be available to individuals with a master's degree in social work and a state or national professional certification. Alternatively, candidates can complete a non-degree post-MSW PEL program, which includes a field education component and a minimum of 400 hours of school-based internship, along with two online courses. All paths require passing the School Social Work Content Area exam. For school counselors, a PEL or an Educator License with Stipulations (ELS) and a School Support Personnel Endorsement is required. This involves completing a master's degree in school counseling, a 100-hour supervised practicum, and passing both the School Counselor Proficiency Test and the School Counseling Content Area exam (105 ILCS 5/10-22.24).

Iowa: In Iowa, school social workers must hold a Master of Social Work (MSW) degree and be licensed as a Licensed Master Social Worker (LMSW) or a Licensed Independent Social Worker (LISW) through the Iowa Department of Public Health. National certification is not recognized as a pathway to licensure for school social workers. Similarly, Iowa does not accept national certification as a route to school counselor licensure, instead requiring state-based educational and licensure credentials.

Michigan: In Michigan, school social workers must hold either a Limited Master Social Worker License or a Master Social Worker License issued by the Michigan Department of Licensing and Regulatory Affairs. Candidates must

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also have an MSW or an equivalent degree from an accredited institution, including a 500-clock-hour supervised social work practicum (MCL 333.18504). National certification is not part of the licensure pathway for school social workers or school counselors.

Minnesota: Minnesota requires school social workers to hold at least a bachelor's or master's degree in social work and maintain a current social work license through the Minnesota Board of Social Work. School social workers are not required to take content, pedagogy, or basic skills exams (MN Rule 8710.6300). For school counselors, a Tier 2 license can be earned by completing a master's degree in counseling or being enrolled in a school counselor program with at least 24 semester credits in school counseling coursework. No content, pedagogy, or basic skills exams are required for school counselors either (MN Rule 8710.6400).

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