

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. 25-047: Creating a pre-student teaching school setting exception for the speech-language pathologist license

REPORT TO LEGISLATURE

I. Basis and Purpose of the Proposed Rule

The proposed rule updates s. PI 34.023, Wis. Admin. Code, to provide flexibility for students completing educator preparation programs leading to a speech-language pathologist license under s. PI 34.0475, Wis. Admin. Code, by aligning state requirements with the standards of the American Speech-Language-Hearing Association (ASHA). Specifically, the rule allows these students to complete their pre-student teaching clinical experiences in a wider range of settings so long as the placement meets ASHA requirements. Additionally, the rule permits supervision in pre-student teaching by individuals certified under ASHA standards in lieu of Wisconsin licensure under ch. PI 34, Wis. Admin. Code. These changes aim to enhance program flexibility and ensure that students are prepared for the varied contexts in which speech-language pathologists practice.

II. Public Hearing Summary

The hearing notice was published in the July 14, 2025, edition of the Wisconsin Administrative Register. A public hearing was held on July 25, 2025.

No persons testified at the hearing held on July 25, 2025. However, the following persons submitted written testimony:

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Timothy Bonson	Representing Self		X	

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

- A public comment on the proposed amendment to rule PI 34.023 raises concerns that the changes would undermine the preparation of school-based speech-language pathologists (SLPs) by allowing pre-student teaching experiences outside of school settings and under supervisors without Wisconsin-specific licensure. The comment argues this change would deprive future SLPs of important, context-specific training, such as navigating IEPs, collaborating with educators, and understanding school

operations, potentially weakening readiness and retention. The commenter further warns that outsourcing supervision to those governed by national standards erodes state oversight and could exacerbate the SLP shortage by discouraging candidates from pursuing or remaining in school-based roles.

Agency Response: The Department acknowledges the concerns raised regarding the importance of school-based experience in preparing speech-language pathologists (SLPs) for service in Wisconsin schools. However, it is important to clarify that the proposed rule change affects only the pre-student teaching portion of the clinical program. The requirement for a full semester of student teaching, conducted full days in a school setting under the supervision of a licensed professional, remains unchanged. This ensures that all candidates will continue to receive extensive, school-specific preparation prior to licensure. The rule change is intended to provide flexibility in the early phases of training without compromising the comprehensive, in-school experience required during student teaching.

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:

2. Form, Style and Placement in Administrative Code:

In response to the comment, the text of proposed s. PI 34.023 (4) (e) has been reorganized and incorporated as a new subd. 2. under s. PI 34.023 (4) (a), as it specifically relates to the licensure requirements for cooperating teachers and school-based supervisors outlined in that paragraph. This placement more accurately reflects the intended scope of the provision. Additionally, because Clearinghouse Rule 25-024, relating to cooperating teachers and school-based supervisors, also amends par. (4) (a), the department has incorporated the relevant changes from CR 25-024 into the renumbered and amended subd. 1., along with a note indicating that these changes are pending at the time of the filing of this rule.

5. Clarity, Grammar, Punctuation and Plainness:

- a. Because the “Notwithstanding par. (e), clinical program may only...” language was removed from the proposed rule, no changes were made as a result of this comment.
- b. The term “cooperating teacher or school-based supervisor” is used intentionally to maintain consistency with the terminology already established in s. PI 34.023. This ensures that individuals responsible for overseeing candidates in both traditional and alternative settings are treated uniformly under the rule. Introducing a new term such as “clinical supervisor” could create ambiguity or confusion regarding roles and expectations, especially since the individual in question is still supervising a candidate enrolled in

an educator preparation program governed by PI 34. By retaining the existing terminology, the rule preserves clarity and alignment with related provisions while allowing flexibility in placement settings. No changes were made as a result of this comment.