

## ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

<p>1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original    <input type="checkbox"/> Updated    <input type="checkbox"/> Corrected</p>	<p>2. Date</p>
<p>3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) Chapter PI 34, Educator Licenses</p>	
<p>4. Subject Modifying the 1-year, renewable license with stipulations for school psychologists</p>	
<p>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</p>	<p>6. Chapter 20, Stats. Appropriations Affected</p>
<p>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</p>	
<p>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)</p>	
<p>9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137 (3) (b) 1., Stats. \$0</p>	
<p>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 checked="" type="checkbox"/> No</p>	
<p>11. Policy Problem Addressed by the Rule The proposed rule change modifies the eligibility criteria for a Tier I, 1-year renewable school psychologist license by allowing applicants enrolled in an education specialist or doctoral program that does not confer a master's degree to qualify if they have completed the number of credits equivalent to a master's degree and verifies enrollment in a qualifying program.</p>	
<p>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, no comments were received to be considered in the development of this economic impact analysis.</p>	
<p>13. Identify the Local Governmental Units that Participated in the Development of this EIA None.</p>	
<p>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 may lead to increased licensure applications for school psychologists, which could generate additional revenue from licensing fees. However, the department may incur administrative costs related to processing applications, verifying program equivalencies, and ensuring compliance with training standards. However, the precise impact of this rule change is dependent on individual behavior and cannot be predicted at this time.  Local: School districts may experience financial benefits by gaining access to a larger pool of school psychology candidates, potentially reducing costs associated with employee turnover and vacancies associated with psychological services. However, the precise impact of this rule change is dependent on individual behavior and cannot be predicted at this time.</p>	
<p>15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule</p>	

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The proposed rule would amend s. PI 34.028 (2), Wis. Admin. Code, to provide that the state superintendent may issue a tier I, renewable license to an applicant who has completed the number of credits equivalent to a master's degree in school psychology while enrolled in a school psychologist program leading to a doctor of philosophy, doctor of education, education specialist degree, or the equivalent. Without a rule change, the department would be required to implement ch. PI 34 as the rules currently exist, and school districts will be left without the flexibility to address this shortage area.

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#### 16. Long-Range Implications of Implementing the Rule

Implementing this rule will have significant long-term implications for both the school psychology workforce and the quality of psychological services in schools. By allowing individuals enrolled in education specialist or doctoral programs to qualify for a Tier I license while verifying enrollment in an approved program in the licensure area and the number of credits equivalent to a master's degree, the rule expands the pipeline of school psychologists, potentially addressing shortages in the field. This change may encourage more graduate students to enter school psychology programs by providing earlier opportunities for hands-on experience and employment. Additionally, school districts may benefit from a larger pool of qualified candidates to support students' educational needs. Ultimately, the rule has the potential to increase student access to psychological services while expanding pathways into the profession for school psychologists.

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#### 17. Compare With Approaches Being Used by Federal Government

Section 300.34 (c) (4) of the Individuals with Disabilities Education Act defines psychological services as a related service, which include administering and interpreting psychological and educational assessments, gathering and analyzing information on child behavior and learning conditions, consulting with staff to design educational programs based on psychological evaluations, managing psychological services and counseling programs for students and parents, and helping develop effective behavioral intervention strategies. However, 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, including school psychologists. As a result, the requirements for licensure vary by state.

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

**Illinois:** Applicants who completed an in-state program must hold a master's degree or higher in school psychology or educational psychology with a specialization in school psychology. Illinois offers license reciprocity to those who hold a valid, comparable out-of-state license and a master's degree or higher from a regionally accredited institution of higher education. If the applicant completed an out-of-state program but did not become licensed, they still need to hold a master's degree or higher. A valid Nationally Certified School Psychologist credential is also accepted. (Ill. Admin. Cod tit. 23 § 25.235)

**Iowa:** A school psychologist needs at least 60 semester hours of coursework beyond the bachelor's. The highest degree attained may be a master's, specialist, or doctoral degree. Iowa does not require students to earn any other terminal degree (besides a bachelor's) en route to the doctoral degree. Candidates are allowed to take required courses beyond the master's without receiving a higher degree. The applicant may receive a one-year Class A license if the only outstanding component of program completion is the internship or thesis and the employment situation will satisfy the internship experience. Iowa also accepts national certification as an alternate way to show that education and experience requirements have been met. (Iowa Admin. Code r. 282-27.3)

**Michigan:** Michigan offers a preliminary school psychologist certificate to those who have either (1) completed a graduate degree of no less than 45 semester credit hours and a 600 clock-hour, supervised practicum in school psychology at an approved program or (2) possesses a valid out-of-state school psychologist certificate or license if the school psychologist program was completed in another state. An out-of-state applicant may qualify for a school psychologist certificate as their initial certificate if they have completed a specialist-level degree or the equivalent with no less than 60 semester credit hours, a 1200 clock-hour internship from an out-of-state Educator Preparation Institution and possess a valid Nationally Certified School Psychologist credential or standard psychologist certificate from the state where the program was completed. (MI Admin. Code R. 380.204)

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**Minnesota:** School psychologists in Minnesota may apply for a two-year Tier 2 license if they completed a school psychology program not accredited by the National Association of School Psychologists and do not hold a Nationally Certified School Psychologist credential or if they provide evidence of completion of a master's degree, or equivalent, in a school psychology program, including two or more years of preparation in the licensure program as a school psychologist and are enrolled in a school psychologist program. Applicants can seek a three-year Tier 3 license if they completed an accredited preparation program in school psychology or hold a Nationally Certified School Psychologist credential. (Minn. Admin. Rules 8710.6200)

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