

Joint Committee for Review of Administrative Rules
June 7, 2018

**Department of Public Instruction
Testimony on CR-17-093 – Teacher Licensure**

Thank you, Chairpersons Nass and Ballweg, for the opportunity to testify before you today. My name is Jennifer Kammerud, Policy Advisor at the Department of Public Instruction (DPI). With me today is David DeGuire, Director of Teacher Education, Professional Development, and Licensing.

This rule represents the first major overhaul of PI 34 since 2000 and is the result of over two years of work with stakeholders across the state. It began with the Professional Standards Council for Teachers, the statutory body that advises the State Superintendent on matters related to teacher licensure, who looked at supply and demand of teachers in the state and how to best attract and retain those teachers. There are significantly fewer teachers going into teacher education. This is seen in other states as well. We have significant shortages in certain subjects such math, science, special education, career and technical education, bilingual education, English as a second language, and foreign language. This is especially the case in rural areas, where shortages, or few applicants, are seen across all discipline areas.

Key stakeholders made up a leadership group on school staffing to advise us on what they were seeing in the field. This included associations representing teachers, superintendents, principals, special education directors, school boards, and institutions of higher education. They advised the DPI over a series of meetings on problems they were seeing and the solutions they would recommend. The concerns that they brought forward included:

- Testing requirements,
- licensing complexity, and
- options for out-of-state and currently licensed teachers.

The DPI also reached out to a number of discipline-specific associations and heard from almost 900 members of the public, including 167 organizations, in our administrative hearings on this rule, held in five locations around the state and through online submissions.

The rule was revised to address what we heard, update language, recognize current professional standards, and recognize changes made in the state budget (2017 Act 59), including both lifetime licensure and alignment to rule requirements.

The rule establishes a revised tiered licensure system as seen below. Teachers, administrators, and pupil services staff are licensed within these tiers.



Tier I consists of those missing full qualifications to teach and establishes ways to deal with the barriers being brought to our attention. Most people will never have a Tier I license as they will exit their preparation programs fully qualified and receive a Tier II license as their first license. **Tier I reflects the practices we have in our preexisting rule for emergency licenses and permits, now renamed Tier I, and additional options in response to stakeholder feedback.**

An example of a pre-existing practice reflected in the proposed rule is how the DPI handles those who have completed all teacher education requirements but have not yet passed the Foundations of Reading Test (FORT). State statutes require passage of the FORT prior to the issuance of an initial license (Tier II under the proposed rules). The table below compares the current and proposed ways in which a license is issued under this scenario.

Current PI 34	Proposed PI 34
Emergency license or permit granted	Tier I license granted
Valid one year	Valid one year
Renewable for up to three years	Renewable. Renewal contingent on taking the FORT
	Special education teachers may only renew for up to three years due to federal law

Additionally, under Tier I, the DPI will be able to issue licenses immediately to educators coming from out of state, offer a path to licensure sponsored by the employing school district, license speech and language pathologists with a Department of Safety and Professional Services license, and license those coming into a district on an internship or residency status.

Tier II, or provisional, licenses are essentially the same category as the initial educator category in the current rule. A Tier II license is what someone would receive upon completing a teacher preparation program. We have created flexibility in the rule, in response to stakeholder requests, to provide options for those completing a teacher education program. There are now more options to demonstrate proficiency in the subject area. Candidates can take the current subject area test or they can now demonstrate proficiency in the subject matter to their preparation program via a portfolio of work or by their grade point average in the subject area.

Other major changes reflected in the rule are the move from licenses based on developmental levels to those based on grade levels and the creation of broad field licenses across subject areas. For instance, instead of offering vocal, instrumental, and general music licenses, we will offer one music license. This changes the licensing system to one where the state is establishing minimal qualifications for licensure and the school district as the employer is determining any additional qualifications for employment. Please know that we will only be issuing these new broader licenses after we have approved preparation programs under the new system in order to ensure that they are providing the requisite content aligned to the license.

At this point I'll stop so David and I can answer any questions you may have.

June 7, 2018

My name is Cheryl Ward, I am a founding member of the Wisconsin Reading Coalition, former President of the WI Branch of the International Dyslexia Association, activist for improving reading instruction, advocate for parents of students with reading weaknesses, and a tutor for individuals who struggle with learning the foundational skills needed to become successful readers.

You have heard testimony today supporting the need for knowledgeable teachers of reading by means of successful passage of the WI-FORT exam. I too, strongly reject the proposed revisions of PI-34 as it pertains to scaling back the requirement that new teachers pass the WI-FORT before granting licensure. For each and every student with reading weaknesses to be identified and receive effective interventions implies and requires specialized teacher competencies. Allowing licensure without demonstration of knowledge would not improve student reading outcomes in WI, but would further degrade them, particularly for our most vulnerable students. You heard the statistics, the number of students in WI who do not read proficiently is a disgrace.

This hearing provides an opportunity for me to represent, through my experiences, all of the reading advocates and parents that have come with and before me. I am passionate that student reading outcomes can improve with the will to do so but to do so requires teachers who have been effectively prepared, supported and developed, for they are the forefront of student reading outcome improvements.

My work as a reading advocate began in the mid-late 1990's as the parent of a struggling reader, in fact my son had no ability to read even the simplest of words. He attended our local and highly ranked elementary school with kind and collaborative teachers. I never questioned their expertise, then in his courageous 3rd grade his special education teacher told me that she had tried everything she could to teach him to read, to no avail. She thought he had dyslexia, sharing that no one in the district could help him learn to read; saying her colleagues did not have the knowledge about or the teaching skills necessary to teach him to read. She told me that I must get educated and advocate for him. But I knew nothing about education; I worked full-time in healthcare as a radiation therapist and department administrator. Shortly thereafter, this wonderful and courageous teacher gave up her weekend to take me to my first conference on teaching a struggling reader with dyslexia. I was lucky and will be forever grateful for her courage. I attended many reading conferences, read the research and learned about reading science and the approaches that would help teachers teach struggling readers. Eventually, I understood the science

and I realized teachers didn't have that knowledge but knew that was the answer to help my son learn to read. I believed just sharing what I learned would change things. This was a time when reading research and effective educational practices to help students improve their foundational reading skills were amassing at breakneck speed but, unfortunately the science was not in translating into practice in classrooms and certainly not known, appreciated, supported or pursued by the overwhelming number of educators around me.

Between 6th and 7th grade, Ryan began effective reading instruction that would address his reading weaknesses; not at school but at highly respected evidence-based learning center in Chicago, where he received one-on-one instruction over summers and during school breaks for 5 years.

Secure with additional knowledge and wanting no one else to endure such pain, I hoped to make a positive impact for all the struggling readers in my school district. I ran for school board and was elected, but school administration, fellow board members, educators, and parents weren't ready for the science. In my school, the majority of kids was doing ok.

In 2006, after propping him up for years, my son graduated from our local high school, with a 3.2 GPA, though reading, spelling and writing at only a 3rd to 6th grade level. I arranged for him to attend one of the most premier reading disability colleges in the country. Ryan attended this extraordinary college for 2 years. Professionals there remediated his reading weaknesses and taught him life and academic skills that passed him by while attending our WI public schools. How many Wisconsin families can take the time to get educated about what is needed to teach reading? How many Wisconsin families can afford to pay an expert to remediate when instruction has been inadequate for their student? Why should a teacher not be rigorously trained? Are we going to allow this sort of thing to go on as it has been for years and years?

I also left healthcare behind in 2006 and tried indirectly to influence reading instruction as a substitute teacher in my local SD for 3 years. Though, I was respected there was little in the way of influence. I knew a lot about reading acquisition, and the necessary teacher knowledge, but I realized I was lacking clinical expertise. So, in 2008, I was accepted into a clinical training program and dove into reading advocacy. I became President of the WI Branch of IDA, meeting researchers, professors, clinicians from all over the country. Here in WI, a new batch of advocates with similar stories to mine began to meet each other and plan for reform and change. We shared information, met and worked with individuals from **education** (DPI, disability groups, adult education, educational leaders and administrators from public and private schools, CESA's),

government (City of Milwaukee, WI legislators, NAACP), **business** (Manufacturers and Commerce), **advocacy groups, politicians, and parents** all over WI.

In 2009, a few of us really networked for change; we arranged for educational professionals, researchers, politicians, and even a journalist, from all across the nation to meet in Chicago as activists to advocate for science-based reading instruction and to inspire a national "voice" for reading reform. We formulated 4 questions for All Americans:

1. If we have a chance to resolve our nation's /state's literacy crisis, should we take it?
2. If current reading practice has led to unprecedented rates of reading failure, would you expect the educational establishment to change it?
3. If we have conclusive evidence about the best way to teach kids to read, would you expect all schools to use it?
4. If we could reduce our special education population and save billions of dollars in the process, would we not want to take advantage of it?

This momentum took us back to our states to do what we could to effect positive reading reforms. In WI our efforts led to the Read to Lead task force and the **2011 WISCONSIN ACT 166** which states:

"The department may not issue an initial teaching license that authorizes the holder to teach in grades kindergarten to 5 or in special education, an initial license as a reading teacher, or an initial license as a reading specialist, unless the applicant has passed an examination identical to the Foundations of Reading test administered in 2012 as part of the Massachusetts Tests for Educator Licensure.", our WI-FORT.

Research and effective practice outcomes show that positive student reading outcomes depend on having access to an effectively-trained and certified specialist/teacher of foundational reading. I have been doing what I can for over 20 years, others even longer. Former superintendent of Milwaukee Public School, recently interviewed said, *"the data are telling us that what we're doing isn't working. ...we don't have the results in mass across any of the sectors...arguingbeing polarized in our education beliefs has not gotten us anywhere."*

Advocates in Milwaukee saw the politics of education in and out of MPS being played-out when working in the Milwaukee Succeeds K-3 reading project.

We have always thought we would achieve significant and positive changes, at the state level for our teachers; but the pattern of 2 steps forward and 1½ steps back remains. This must not continue to be the case.

We applaud and support the Elmbrook SD and its leaders, who have opened their minds, who have reached out to advocates, who do not wait for DPI to recognize the science of what teachers need to be effective teachers of reading. It takes courage and tenacity to push against those that do not want to acknowledge that change must happen, and that change requires hard work and new ways.

Do not remove the current WI-FORT requirement for teacher licensing. Please table the adoption of the proposed changes in statute language. Teacher quality standards of reading must be ensured. Insist that the DPI develop standards to reflect the science of reading that would then require our IHE teacher preparation programs to effectively train teachers of reading. Develop policies and implement programs that will ensure that **every reading teacher of record** can demonstrate skills.

My son, now a successful adult with a college degree and gainfully employed would not have the success he has today had I settled for what my local schools, your local schools were offering to him in learning to read. My son is one struggling reader, there are thousands just like him, I work with them, hear their stories. They take their pain into their lives every day, each just wanting to learn to read.

Thank You. Respectfully,

Cheryl Ward, MS, CALP

Bayside, WI

Thank you for giving the public an opportunity to raise concerns about the proposed teacher licensing rules drafted by the Department of Public Instruction.

My name is Mary Newton, and I am from Wauwatosa, Wisconsin. I am a certified academic language practitioner and dyslexia practitioner, and have been working for the past 20 years teaching struggling readers and helping reading educators who want to improve their effectiveness. I am a founding member of the Wisconsin Reading Coalition.

Reading is the most important academic skill we are responsible for teaching young children in our schools. Reading failure affects a child's immediate and long-term academic outcomes, as well as self-concept, behavioral choices, and occupational goals. It also affects society in terms of decreased economic growth and increased costs for remedial education, social services, and prisons.

Wisconsin is not doing well in teaching young children to read proficiently, and has not been doing well for many years. In the latest administration of the National Assessment of Educational Progress, Wisconsin 4th graders ranked 34th in the country for reading performance. Our white students ranked 41st among the nation's white students, and our black students ranked 49th among the nation's black students.

The bipartisan Read to Lead legislation in Wisconsin in 2011 was intended to begin turning around this sorry state of affairs. One of the important provisions of that legislation states that:

"The department may not issue an initial teaching license that authorizes the holder to teach in grades kindergarten to 5 or in special education, an initial license as a reading teacher, or an initial license as a reading specialist, unless the applicant has passed an examination identical to the Foundations of Reading test administered in 2012 as part of the Massachusetts Tests for Educator Licensure."

This statutory requirement is known as the Wisconsin Foundations of Reading Test, or WI-FORT. The intent was twofold: to ensure that students were taught by a competent teacher, and to ensure that future teachers were taught the necessary information about foundational reading in their teacher preparation programs. Unfortunately, too many college students are not being taught the foundations of reading, and consequently are failing the WI-FORT. The first time passage rate for test takers between September of 2014 and August of 2017 was between 66 and 68%.

Do we feel bad for these aspiring teachers who cannot become fully licensed after investing their time and money to get an education degree? Who are left on their own to find and learn about the science of reading and forced to take the WI-FORT multiple times? Absolutely!

Do we think the answer is to allow them to teach without passing the test, as DPI makes possible in its new licensure rule? To give them a Tier I license that they may then renew year after year without passing the WI-FORT? No! This solution benefits only the individuals who failed the WI-FORT, and does not address the core problem, which is that they did not have the knowledge to pass the test. Allowing them to become teachers of record without passing the WI-FORT does not solve that underlying problem. Their students will still have a teacher who lacks the necessary content knowledge, and the teachers will still experience the frustration of being ineffective with many of their students. Further, there is no effort to address the root of the problem, which is inadequate standards for what educator preparation programs are required to teach prospective teachers about reading.

DPI and its workgroups say that this broad exemption from the WI-FORT is necessary because there is a shortage of fully-licensed teachers. It is hard to know how much stock to put in this explanation, because only anecdotal stories

of shortages have been presented. A recent study from the Wisconsin Center for Educational Research contains the only hard data, and seems to indicate that any shortages are likely limited to certain subject areas or geographical areas of the state. If this is the case, giving exemptions from the WI-FORT in order to put a body in the classroom should be limited to instances where a district shows they cannot find a fully-qualified candidate. This has been possible for the past several years under DPI's emergency licensing rules, and would be a reasonable exception to the WI-FORT requirement if it could be limited to a one-year, non-renewable license.

Extending this exemption by granting Tier I, renewable or multi-year licenses to any individual prepared in-state, out-of-state, or by their employing school districts serves no legitimate purpose and lowers the quality of teachers in the classroom. Where there is an applicant who has passed the WI-FORT, districts should not be able to hire individuals who have not passed it.

I encourage you to table this rule and send it back to DPI to be re-written to align with the intent of statute section **188.19(14)**, which requires passing the WI-FORT to become an elementary, special education, or reading teacher of record. Any exceptions for instances of proven teacher shortages should be narrowly written, and some effort should be made to address the lack of reading standards in colleges of education so that we do not continue to have this problem moving forward.

June 5, 2018

"Hello and thank you for taking the time to hear my story today. My name is Jennifer Wisniewski, I am an early-education teacher, and my daughter Avery was diagnosed "at risk for dyslexia" in 2017, at five years and nine months old. She was born at 29 weeks and spent seven weeks in the NICU. She was born fighting to survive and now it seems she will continue to fight; to keep up with her peers and to not be left behind in a world that doesn't hold much value for kids who don't catch on right away. It was obvious that something wasn't quite right with the way Avery processed information about sounds and letters, but we were completely clueless as to what could be happening inside her head; we couldn't see the disconnect. She was so young, and we tried just giving her time, but knowing that early intervention is crucial to future success, we felt it was essential to have her tested. We have been so fortunate to have amazing teachers in a private school setting who have advocated for her and worked with us to give her the best opportunities possible. And although Avery has had amazing teachers, it wasn't until she started seeing Cheryl Ward, an OG-trained literacy specialist and advocate for children who have reading difficulties, that she started to make real progress. She has helped to change the way that Avery sees letters and words and sentences and ideas. And speaking of those amazing teachers, they were able to take time out of their teaching day to come and observe one of Cheryl and Avery's lessons and get some ideas for ways to best help our little kindergarten girl. We are so thankful we are in a position to give her this type of individualized education and recognize that not all children in her position are as fortunate.

What kind of help would she be receiving in public school? I understand the limitations most schools are facing when it comes to servicing children who don't fit into the mainstream way of learning. I know from experience that many schools won't even consider testing a child for dyslexia until they are in second grade or beyond. Second grade! By then your child could be one to two years behind her peers and irreparable damage could be done to their self-esteem and self-confidence. How are we screening children for vision and hearing problems and not

screening them for learning difficulties? Isn't it our obligation as educators to do all we can for these children. To offer them their best chance at success?! By waiting until these issues become CRIPPLING problems, we are failing them. If we had more literacy specialists and classroom teachers who were trained in the appropriate ways to teach ALL learners, we could serve the children who need extra help. And how could it possibly hurt the children who learn at a faster pace?"

In Wisconsin, teachers of reading must take and pass the Foundations of Reading exam (FORT) exam to demonstrate and verify that a teacher applying for a new teacher license has the basic content knowledge and application skills, necessary to successfully teach all of their students the foundational skills of reading.

Proposed PI-34 teacher licensing rule revisions include the creation of a Tier I license 34.028 parts (a) and (c), and provides broad exemptions from the WI-FORT, and would allow in and out of state graduates of an educator preparation program to be granted a license for one year and renewed indefinitely through a combination of teacher and district request without ever passing the WI-FORT would negatively affect student reading outcomes and ensure that teachers are not supported with the tools and knowledge they need to be successful.

Study after study shows the most important factor for a child to demonstrate academic success is the teacher. How can we allow attempts to improve and support their knowledge in the most important task where we expect a student to exhibit mastery? Reading crosses every discipline and yet we do not sufficiently prepare and support our teachers to do so.

The proposed changes in this rule degrade the knowledge a teacher must have and points to ineffective and inadequate teacher preparation standards. Teachers, just like me, want desperately to be effective and supported and deserve to be held to the standard of knowledge that is based on the passing of the WI-FORT.

I know, and have seen, teachers are not sufficient prepared to effectively help the many struggling readers reach expected reading outcomes. Please reconsider suspending PI-34 rule revisions, as it pertains to skirting/ diminishing FORT requirements. Maintain the FORT and expand and support teachers with rigorous reading teacher standards, ensuring that the students will instruct will become strong readers. Include the amazing professionals working with students outside of the school day that have sought out additional education and practice helping students improve their reading weaknesses. I'm lucky, it's not easy, but I can afford a tutor, the majority cannot. Wisconsin teachers and students deserve nothing less.

Thank You

Jen

Bayside, WI

Statement in response to PI-34D

Decoding Dyslexia Wisconsin

Statement in response to PI-34 Re: Changes to WIFoRT Foundations of Reading Test

June 1st, 2018

Decoding Dyslexia Wisconsin is a parent-led grassroots organization comprised of a diverse group including educators, researchers, and specialists all concerned with reading. Reading in today's society is not optional.

Deep Educator Knowledge of Phonics, Phonemic Awareness, Vocabulary, Oral Reading, Reading fluency, and Comprehension strategies are outlined by the National Reading Panel¹, IDEA/ Individuals with Disability Education Act², NCTQ/ National Council on Teacher Quality³ and Florida's Center for Reading Research⁴. Reid Lyon MD submitted testimonies to Congress in 1997 after over 30 years of research, costing over 250 Million dollars of Congressional funding through the NICHD/ National Institute of Child Health and Human Development⁵. The NAEP/ National Assessment of Educational Progress/Nation's Report Card demonstrated that in 2017 Reading scores in Wisconsin dropped across the board. 65% of Fourth Grade Students are not reading proficiently at grade level⁶. Mathematics scores also have been affected. Being unable to read well at grade level affects all domains.

Act 166/The Wisconsin Foundations of Reading Test was a great beginning in an attempt to give teachers more tools, strategies and knowledge in order to be better prepared to face the challenges of the classroom. It is unfortunate that Wisconsin Universities have not made better efforts to help "teaching candidates" by providing time to learn this important material as well as interactive experiences in the classroom with children for application of core components in reading instruction. Students are shown to perform better when given the opportunity of time and practice by working with materials in a mentoring environment. The opportunity to discover what works how and why it works instead of cramming to learn 107 pages of a WIFoRT study guide coupled with a PowerPoint presentation. Educators could become more effective diagnostic teachers able to separate out which subskill a student may be having difficulty with and make corrections as needed.

Investing in teacher's knowledge is critical to push Wisconsin youth forward. Teaching Reading is the focus of the first three years of school, there is not one more important skill for a student to obtain proficiency in. Every subject requires reading, our educational system is based upon proficiency in literacy skills. Technology cannot take the place of the skill of reading. If a student does not learn solid foundational skills we are not setting them up for success. If a teacher does not understand the subskills of reading, we can see how it affects student progress. We know a lot about reading, the research is not making its way into the classrooms.

HR-3033 The READ act /Research Excellence and Advancements in Dyslexia February 2016 has assigned funding for research until 2021⁷. The applied strategies proven effective with

Dyslexics are effective with all students. The differences with a student who has been diagnosed with Dyslexia lie in the intensity of the instruction and the repetition. In health care fields students are taught about health and variants of health to be able to discern the differences. There is a focus to early identify "at risk" children, understanding developmental milestones and "norms" can help with diagnosis and interventions. If a teacher genuinely understands the signs of children at risk for reading failure, they can work on applied strategies. In business and health care strict measures of quality control are applied. A teacher learning about dyslexia helps to create not only a more accommodating teacher overall, but also a better instructor in terms of reading.

Structured literacy ensures students can achieve foundational skills to eliminate the need for a revolving door of remedial teaching. Invest in teachers, to learn the sound structure of language, the writing system of letters, handwriting, spelling conventions and grammar used in building sentences. Publishers, clever marketing of products and programs can never replace or substitute the watchful eye of a skilled educator. Technology is not sensitive enough to pick up on the where a child may need more focus nor is it as powerful as the student teacher bond which can motivate and elevate children to persevere and challenge themselves to reach new heights. There is no personal connection that forms between a student and technology, no warm smiles, no intimate association or reciprocity formed. Support and assist teachers in Wisconsin so that we can be a leader in literacy.

Waiving WIFoRT requirements for any teachers is not a step to move Wisconsin Forward, please consider the following suggestions:

- Create minimally one class of at least one term's length which would allow teaching students time to read, study, and get accustomed to terminology, include practice with students to absorb the materials covered in the WIFoRT exam, and give ample time to understand and learn the subskills of reading. One class divided up into sub units of study could help more teaching candidates thoroughly master all the specifics. How can students be expected to absorb the material if they have not been taught it? The Current reading instruction taught is based upon "Whole Language" not based on the science of reading.
- Create active study groups in the Universities throughout the year to facilitate practice in classrooms with mentors. Learn the Role of phonics in reading development, develop skills about vocabulary development, acquire knowledge about concepts of print, discover word analysis skills and strategies, phonemic awareness and the importance of it.
- Adopt some precursor "required reading" minimally including background knowledge from books such as "Essentials of Assessing Preventing and Overcoming Reading Difficulties"⁹, "From Speech to Print Language Essentials for Teachers"¹⁰, "Writing Skills A Teacher's Handbook"¹¹.
- Create a program in the UW system that teaches "Structured Literacy", and adheres to the "Knowledge and Practice Standards for Teachers of Reading"¹² and the International Literacy Association¹³ recommendations.

- Decoding Dyslexia Wisconsin concurs with Wisconsin Reading Coalition suggestions⁸.

1. <https://www1.nichd.nih.gov/publications/pubs/nrp/Documents/report.pdf>
2. <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/essential-components-reading.pdf>
3. <https://www.nctq.org/yearbook/state/WI-Teaching-Reading-75>
4. <https://education.ucf.edu/mirc/Research/Closer%20Look.pdf>
5. <http://www.reidlyon.com/edpolicy/3-HEARING-ON-LITERACY.pdf>
6. https://www.nationsreportcard.gov/profiles/stateprofile/overview/WI?cti=PgTab_OT&chort=1&sub=MAT&sj=WI&fs=Grade&st=MN&year=2017R3&sg=Gender%3A+Male+vs.+Female&sgv=Differences=Single+Year&tss=2015R3-2017R3&sfj=NP
7. <https://www.inresg.org/stemld>
8. <https://drive.google.com/file/d/1SOYY9IjGArIfcmln0GQRxoKdnx7xIm-/view>
9. <https://www.wiley.com/en-us/Essentials+of+Assessing%2C+Preventing%2C+and+Overcoming+Reading+Difficulties+-p-9781118845240>
10. <https://eric.ed.gov/?id=ED446451>
11. https://eps.schoolspecialty.com/EPS/media/Site-Resources/Downloads/program-overviews/S-writing_skills.pdf?ext=.pdf
12. <http://www.readingrockets.org/sites/default/files/IDA%20Knowledge%20and%20Practice%20Standards%20for%20Teaching%20of%20Reading.pdf>
13. <https://www.literacyworldwide.org/docs/default-source/where-we-stand/ila-democratizing-professional-growth-with-teachers.pdf>

Opposition to CR17-093

June 7, 2018

To: Joint Committee on Review of Administrative Rules

Senator Nass and Representative Ballweg co-chairs, members Rep Anderson, Senator LeMahieu, Senator Stroebel, Senator Larson, Senator Wirch, Representative Neylon, Representative Ott, Representative Hebl, Representative Anderson

From: Lisa Tomberlin

Teacher of the Blind and Visually Impaired

CESA 3

5907 Glenway St

McFarland, WI 53558

Thank you, JCRAR committee for hearing our concerns today. I am here on behalf of students who are blind or have low vision in Wisconsin. I have been a Teacher of the Blind and Visually Impaired for 27 years in the state of Wisconsin. While I am not an Orientation & Mobility (O&M) instructor, I am very concerned the O&M services that our blind and visually students need to be able to travel as independently as possible so that they can participate fully in society, enjoy leisure activities of their choosing and get to and from work. Several of my colleagues would have liked to have been here today but could not, as they are still working with students in school. I believe you have received written comment from several of them and I bring comments from others.

We have a severe shortage in available services for children who are blind or visually impaired in the state of Wisconsin. This shortage is not new but it is now getting worse. As of this year, we no longer have a training program in our state for training teachers of the blind or visually impaired and we have not offered a training program for Orientation and Mobility Instructors in state for many decades. There is a very high percentage of unemployment (Nationally 63% on one current study) for people who are blind or visually impaired. We need to do everything we can to attract these professionals and keep these professionals in our state in order to help our students.

When the open meetings across the state, O&M was being considered for life licenses. O&M instructors have had the same renewal requirements as Teachers of the Visually Impaired as far back as I can remember, so this made sense to us. Then all of a sudden

in March, we heard that the Academy of Certification of Vision Rehabilitation and Education Professionals (ACVREP) certification was required for renewal. Many of us were shocked. Only 16 of our O&M instructors in our state have chosen to obtain this elective certification. And many of them serve adults only. Our rules for O&M licensure have never included this certification in the past.

The Superintendent's Advisory Council for the Blind and Visual Impaired was not included in discussing prior to this decision being made. When professionals of our list service began to express concern, DPI set an Advisory Council meeting for April 23. Many of us also contacted the DPI to express our concern. My colleagues, Cindy Lambert and Diane Gafney, and I conducted a survey of stakeholders and shared this information at that meeting of the Superintendent's Advisory Council on Blindness and Visual Impairment Education. This survey results are included with my letter. Six days prior to that meeting, the DPI sent a Germaine amendment to the Legislative Education council. This amendment added an additional option for license renewal, the option to take 6 college credits, to renew their license. While this is an improvement, we do not feel it gets at the heart of the problem in attracting and keeping O&M instructors and it has added a new layer of problems. We were informed at the Superintendent's Advisory Council meeting that it was too late to make any further changes....so that is why we have pursued coming to the legislature at this time.

One major issue is that our current rules for O&M are based on antiquated information. The stipulation that the O&M candidate must complete a program that has approval of the association for education and rehabilitation of the blind and visually impaired (AER) is outdated. At this point in time, only ½ of the Orientation and Mobility Programs in our country have sought and have been granted AER approval. Having this requirement in our rules greatly reduces our pool of candidates for O&M in Wisconsin. We need to change the language for initial O&M licensure to completion of a program from "an accredited 4 year college or university".

Secondly, by adding the option of renewing by certification by the ACVREP, we are participating in discrimination. There are only two certifying bodies in the United States for O&M instructors. The ACVREP and the National Blindness Professionals Certification Board (NBPCB). The NBPCB is an organization that has certified persons from across the country, 75% of whom are blind themselves. They have a different philosophy and method of instruction from ACVREP but are considered every bit as credible. In fact, the two organizations have collaborated in the writing of joint letters to states, such as their 2011 letter to New York requesting both organizations be considered for state licensing. If Wisconsin is going to accept certification from one organization, why not the other? While we currently do not have any O&M instructors in Wisconsin with this certification, there are 5 NBPCB certified instructors in Minnesota and 4 in Iowa. Perhaps they would like to come to Wisconsin and take a job. If DPI

continues to offer ACRVEP certification, we must add the option of NBPCB certification as well.

Finally, on a recent count of those licensed with DPI we have about 46 O&M teachers in our state that are licensed to work with children and only with 14 who are not also licensed as teachers of some sort. If these folks find it difficult to renew their O&M licenses, we may lose some of them. As you can see by our survey data, the majority of people who hold TVI and O&M dual licenses want to have a life license. Some of them indicated that if O&M doesn't have a life license option, they will just chose to not keep their O&M license. Wisconsin can not afford to lose even one of these providers.

It is true that now O&M resides in section of rules pertaining to Related Services. In that section you will see a variety of renewal options for each related service area. Most of the providers in that section also have to be licensed by the Wisconsin Department of Safety and Professional Services Board. O&M does not have to be licensed by that body. O&M is a unique category. While most of those related services provide a therapy or medically based service of one kind or another, O&M instructors teach part of the expanded core curriculum for students that are blind or visually impaired. While we have simplified the rules related to licensure for Teachers of the Visually Impaired, we have not done so for O&M providers.

I have attached the letter I sent to Representative Ballweg and Senator Nass. In that I have outlined the changes we would like to see in the O&M licensing rules given the language currently used in the rule.

I thank you so much for taking the time to hear these concerns and for the important work you do.

Re: Clearinghouse Rule 17-093

The Honorable Representative Joan Ballweg
Room 210 North
PO 8952
Madison, WI 53708

The Honorable Senator Stephen Nass
Room 10 South
PO 7882
Madison, WI 53707

May 13, 2018

Dear Rep. Ballweg and Senator Nass,

Input from stakeholders in the education of the children who are blind or visually impaired was solicited and then shared at a very recent meeting of the State Superintendent's Advisory Council on Blindness and Visually Impairment Education on April 23, 2018. At that meeting State Special Education Director, Dr. Barbara Van Haren, indicated that the final changes to Clearinghouse Rule 17-093 had been sent just a few days prior and thus the DPI could not include the following proposed changes, though she encouraged us to reach out to you with our ideas. We believe the proposed changes to the Clearinghouse Rule 17-093 are critical for Orientation and Mobility (O&M) Instructors and that without these changes Wisconsin may see a decline in the number of the professional in this area which is already in shortage.

Although a low incidence area, we believe that is very important that we do not take any steps that will further prevent children who are blind or visually impaired from receiving services that will allow them to seek and retain employment. Currently unemployment rates for blind and visually impaired persons in the US are about 63%. Lack of access to an adequate number of O&M instructors could further impact this problem. Please consider the changes to the proposed rules below.

The current proposal reads:

PI 34.089 Orientation and mobility, 5-year renewable license.

- (1) AUTHORIZATION. A license issued under this section authorizes the license holder to provide orientation and mobility related services in prekindergarten through grade 12.
- (2) ELIGIBILITY. The state superintendent may issue an orientation and mobility license under this section to an applicant who has completed an orientation and mobility program **(from an accredited 4 year college or university)** approved by

~~the association for education and rehabilitation of the blind and visually impaired~~
and has demonstrated knowledge and understanding in all of the following:

Reason: Information in () is added in place of information that has been "strikedthrough". This is an outdated requirement as only half of the current O&M Programs in the United States seek the approval of the Association for Education and Rehabilitation of the Blind and Visually Impaired. This limits the number of candidates for O&M who may seek employment in Wisconsin, which can be detrimental to our blind and visually impaired children as we already have a shortage in this area.

- (a). Child or adolescent psychology;
- (b) Measurement and evaluation;
- (c) Psychology of education or educational psychology; and
- (d) Curriculum and methods of instruction.

(3) DURATION. A license issued under this section is valid for 5 years.

(4) RENEWAL. A license issued under this section 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 or **(the National Blindness Professional Certification Board)**.

Reason: Add the information enclosed in (). There are only 2 certification bodies for O&M in our country at this time. This could be seen as discrimination as 75% of the graduates with National Blindness Professional Board Certification are blind or visually impaired persons unlike those certified through the ACVREP.

- (b) Completion of 6 semester credits from an accredited institution of higher education.

((c) Applicants who hold or are eligible for a life license in a teaching, pupil services or administrative category)

Reason: Add option (c) above for the following reasons:

More than 65% of current O&M instructors in our state also hold teaching or administrator licenses. O&M instructors indicated they may not pursue renewal of their O&M license since they would still hold a valid teaching license. This would be extremely detrimental to our blind and visually impaired students. O&M applicants are often also teaching in other areas and delivering O&M services on a part time basis. Most of our Orientation & Mobility instructors have not sought or maintained certification from any of the above named organizations as it is never been required in Wisconsin.

OR Preferably

Change this license to a Life License

Reason: O&M is an unique field. O&M differs greatly from the other related service providers in that they are not required to maintain licensure in any other way by the state. They do not provide therapy...they are teaching skills related to the Expanded Core Curriculum for Students with Visual Impairment.

Please see attached survey conducted by Cindy Lambert, O&M, Diane Gafney, O&M and Lisa Tomberlin, TVI submitted at the State Superintendents' Advisory Council on Blindness and Visual Impairment Education Meeting.

Thank you very much for your time and consideration in this matter.

Most respectfully,

Lisa Tomberlin
Teacher of the Blind and Visually Impaired
5907 Glenway St
McFarland, WI
53558
(608) 239-9956

O&M Licensure Survey Results

April 23, 2018

QUESTION SUMMARIES

DATA TRENDS

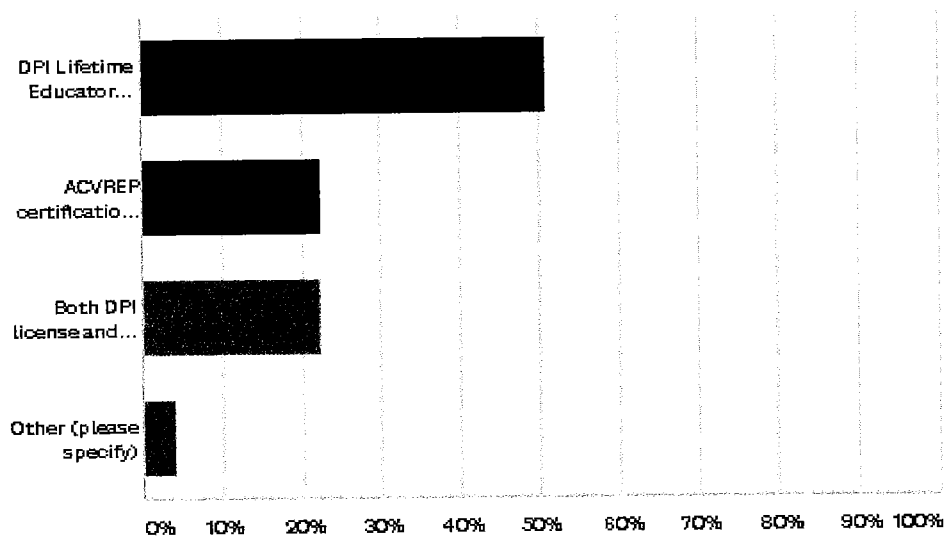
INDIVIDUAL RESPONSES

Q1



Given the current proposed rule changes by DPI, what type of license/license renewal do you feel Wisconsin DPI should require for O&M Instructors?

Answered: 49 Skipped: 0



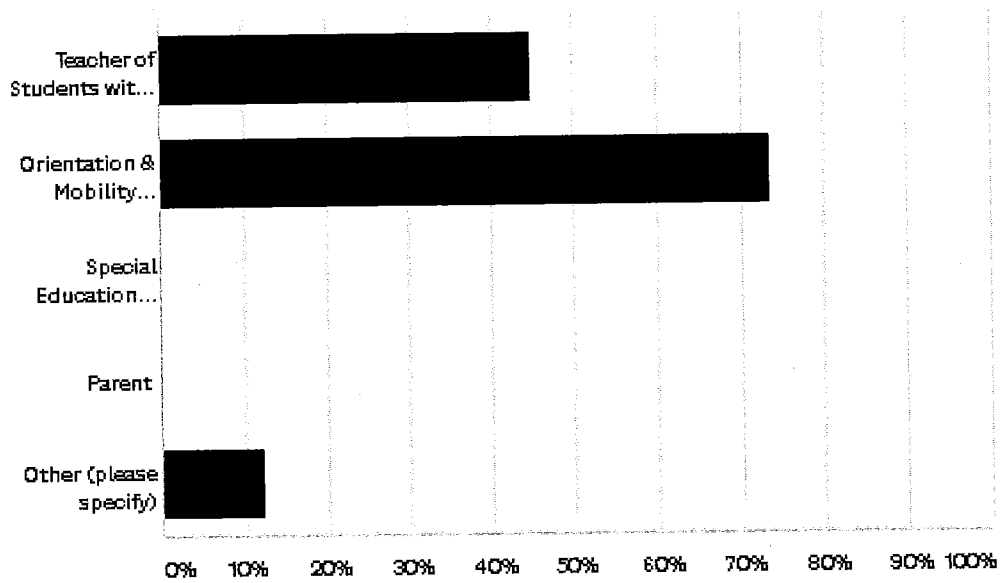
ANSWER CHOICES	RESPONSES	
DPI Lifetime Educator License	51.02%	25
ACVREP certification only	22.45%	11
Both DPI license and ACVREP certification	22.45%	11
Other (please specify)	Responses 4.08%	2
TOTAL		49

Q2



Please indicate your current position. Check all that apply.

Answered: 49 Skipped: 0



ANSWER CHOICES	RESPONSES	
Teacher of Students with Visual Impairments	44.90%	22
Orientation & Mobility Instructor	73.47%	36
Special Education Administrator	0.00%	0
Parent	0.00%	0
Other (please specify)	Responses 12.24%	6
Total Respondents: 49		

Wisconsin O&M Licensure Survey Results
April 23, 2018

49 Stakeholders participated in the survey (Orientation & Mobility Instructors, Teacher of the Visually Impaired (TVIs), students, and administrators

25 out of 49 (51%) were in favor of Life License for O&M instructors

19 of 38 (50%) O&M or dual licensed O&M/TVI, were in favor of the Life License

10 out of 15 (67%) Dual certified (O&M/TVI) were in favor of Life Licenses

7 out of 9 (78%) TVIs favored Life Licenses for O&M instructors

2 dual certified O&M/TVI instructors said that they would give up their O&M license if they could not get a life license since they had a teaching license to fall back on

June 3, 2018

Dear Representative Ballweg,

In light of the recent NAEP results placing Wisconsin reading scores at a sadly low percentile, I am horrified to see that there is action to allow exemptions for those teachers who are unable to pass the FORT exam. Reading is a life-long skill that is critical for present and future success of all students. Without a solid preparation in the foundational skills of reading, we are failing our students and future generations.

Training in our state has lacked in the teaching/understanding of the science of reading development. Something serious needs to be done in this area, and that should not be allowing people to teach this critical skill without demonstrating a significant understanding of how to achieve this. Before change can be made, teachers need to be well-educated in the science of reading and the diagnosis of reading difficulties as their students enter the education system. More training is needed in this area, not just to pass a test, but to really have a dedication to understanding what is involved in beginning reading instruction.

By exempting people from the test, we are failing to address the seriousness of these issues in our communities. We are saying that less will just have to do. Would we like to see the same thing happen in medicine, law, science, etc. This issue needs to be taken very seriously. Not having enough candidates ready to meet the challenge involved in teaching does not let us off the hook. We need to address the issues in recruiting quality teachers while at the same time, not lowering our standards and providing the best instruction in the area of reading. We cannot leave this up to co-workers or internal quick trainings. It needs to be a concerted effort to educate.

Over the past forty years (25 years in Madison schools), I have taught in the area of learning disabilities, cross categorical special education, Title I, regular education and reading intervention, privately tutored students as well as volunteered at a variety of agencies. Much of my training has been in other states and at ongoing local/national conferences where reading is addressed by experts in the field. My initial reading instruction involved extensive coaching and problem solving with expert trainers. We need to look at what is going on in our state and not just settle.

In conclusion, I do hope that you and the other committee members will take a good look at what is happening in our state and do what is best for our young and vulnerable learners and take this difficulty passing the exam as a wake-up call for our state.

Sincerely,

Laura Blustein
114 Ohio Ave.
Madison, Wisconsin
(608)345-7574

I am here to testify on behalf of the School District of Elmbrook to express our concern about proposed modifications to teacher licensure as it relates to having highly qualified teachers to provide science-based reading instruction. My name is Kathryn Wilson and I serve as the School Board President.

The School District of Elmbrook serves approximately 7000 students in a suburban setting just West of Milwaukee. We work in a highly competitive k-12 market, and are experiencing growth in both numbers and diversity. Students come to us from all over the US and the world, speaking more than 50 languages. It is critical that we have a highly trained teacher in every classroom so that the needs of our diverse student population can be met.

At a time when Wisconsin 4th grade reading scores have fallen below the national average, and the achievement gap in Wisconsin is one of the largest in the country, lowering the standards for a teaching license makes no sense. Elmbrook supports the recommendations of the Governor's Read to Lead Task Force (2012) and the ensuing legislation, including the Foundations of Reading Test (FORT) for new teacher licensing. We hope that your support will continue as well.

As an organization, we set aggressive goals for academic achievement because we know that if our students achieve at high levels, more doors will open to them. In particular, we focus on literacy at the kindergarten through third grade level. A significant body of research tells us that reading proficiently by the end of third grade is critical for future academic success.

That is why we support the current statute 118.19(14) that requires new K-5 teachers, reading teachers, reading specialists and special education teachers to pass the Wisconsin Foundations of Reading Test before getting an initial license to teach. Ratings of Wisconsin teacher preparation curricula for reading instruction have increased steadily since the adoption of the FORT. We view this as a positive development and look forward to continued growth. Retreating from the FORT as a requirement for teacher licensure would jeopardize this early momentum.

The recently released results of the 2017 National Assessment of Educational Progress (NAEP) highlight the urgency of having knowledgeable teachers of reading in Wisconsin classrooms. Sixty-five percent of Wisconsin 4th grade students were not proficient in reading as measured by the NAEP. Our national ranking has slipped to 34th, and all sub-groups of students perform below the respective national averages. Our students who identify as African American rank 49th out of 50 in the country, while our students who identify as Caucasian rank 41st. We must do everything in our power to address this crisis.

The science is clear—neuroscientists and other experts know the elements that comprise good reading instruction. Passing the FORT offers assurance that our

teachers know those elements, too. The Foundations of Reading Test is a pivotal piece of accountability for teacher preparation programs. Removing the Wisconsin FORT requirement for teacher licensure is simply not prudent. Our children and our new teacher graduates deserve every opportunity for successful reading instruction.

The School District of Elmbrook strongly recommends the following:

- Maintain teacher quality standards while moving to expand pathways to teaching; do not remove the FORT requirement from our licensure process.
- Table the adoption of this proposed administrative rule change until it is amended to better support teacher quality standards and align with the intent of statute 118.19(14)
- Limit the instances where the FORT is waived to those in which a district proves it cannot find a fully-qualified teacher to hire, and limit the duration of those licenses to one year, with reading taught under the supervision of an individual who has passed the FORT.
- The Department of Public Instruction should set standards for teacher preparation programs that encompass both the Standards for Reading Professionals and the Knowledge and Practice Standards for Teachers of Reading. These standards would enable aspiring teachers to pass the FORT and enter our classrooms prepared to teach reading.
- The DPI should implement a corrective action plan for teacher preparation programs where fewer than 85% of students pass the FORT on the first attempt in any given year.

Aspiring teachers who commit themselves to a teacher preparation program offered by one of our Wisconsin colleges and universities should be able to rely on that program to equip them with the knowledge and skills they need to pass the Foundations of Reading Test. In turn, local school districts should be able to rely on a Wisconsin teaching license as an indication of high-quality teacher preparation that includes competence in science-based reading instruction. Please do not weaken the administrative rule that requires passing the FORT. Any loopholes or exemptions for reading will need to be made up at the local level.

The School District of Elmbrook is doing our part to ensure that all children learn to read proficiently. We have set aggressive goals for reading attainment and aligned our curriculum and strategic plans to meet those goals. Our commitment to having highly-qualified teachers of reading in every classroom means we will train every one of our elementary school teachers in the fundamentals of reading science by the end of the next school year. We will also deploy a differentiated compensation strategy that rewards teachers—including accomplished veterans—who successfully complete the Foundations of Reading Test. The knowledge and skills represented by the FORT are that important to our success.

We are fortunate to be able to pursue these goals. At present, we have the resources—in terms of time, leadership, and revenue—to do what must be done. Not every community can do that. No community can do that all the time. Wisconsin school districts must be able to rely on the wider educational system in our state to provide the best possible teacher preparation and certification. Please keep the current requirement for all new K-5 teachers, reading teachers, reading specialists, and special education teachers to pass the Wisconsin Foundations of Reading Test in order to obtain an initial license.

We recognize that teacher shortages are real in some communities. We too have seen a dramatic decline in the number of applicants for positions in Elmbrook. We are still finding great candidates, but a competitive job market, the retirement of baby boomers, and a national trend away from teaching as a career choice has reduced the pool. To respond to those challenges by lowering standards for teaching reading, we believe, is a mistake with long-term consequences. The Read to Lead legislation that enacted the FORT as a licensing requirement was courageous public policy. The Department of Public Instruction and our Wisconsin teacher preparation programs must also rise to the occasion. I ask you to stand firm by maintaining the FORT requirement as adopted by the legislature in 2012. Great public policy takes courage in the face of adversity. Let's hold fast to great public policy.

Thank you.

June 5, 2018

Hello

I am writing out of concern about the issue of O & M license renewal. My concern is this: DPI has reduced license requirements for teachers in other areas– to maintain qualified staff in teaching positions. I have been in the field of Orientation & Mobility since 1982, and O & M is an area that has **always** had job openings which are very challenging to fill, especially in rural areas away from major cities. Multiple people in Wisconsin who are holding current O & M positions will be retiring in the next five years. I fear there will be even more unfilled positions if these individuals are now required to pay to take a test and obtain a license they have not been required to have during their entire career OR take six university credits. I have found it difficult to find classes with college credits in the area I live related to Orientation & Mobility, and I live near Milwaukee.

The students who are visually impaired and their families, and the public school staff who work with our students, and rely on the expertise of O & M specialists as professionals with the unique education and experience to meet the independent mobility needs of students with visual impairment, will experience the negative consequences of lack of licensed staff in this area. The cost and inconvenience of obtaining a new license through AVREP, or take courses unrelated to Orientation & Mobility may cause many currently in the field, to leave the field when their licenses lapse.

It is my opinion that we should all be life-long learners. I have always attended state, regional, and national conferences to acquire knowledge and remain current. I am a member of our local listserv, to share and receive pertinent information with Wisconsin Teachers of the Visually Impaired and Orientation & Mobility Specialists. I belong to Facebook groups with TVI's and O & M Specialists for the same purpose.

In conclusion, I am not sure why O & M Specialists are being singled out as a small but valuable group of educators for whom DPI is creating a unique set of license requirements.

Thank you.

Nadine Kupfer

Orientation & Mobility Specialist



Because Leadership Matters

Association of Wisconsin School Administrators

4797 Hayes Road, Suite 103

Madison, WI 53704-3288

Phone: (608) 241-0300 • Fax: (608) 249-4973

www.awsa.org

June 7, 2018

Joint Committee for Review of Administrative Rules
State Capitol
Madison, WI 53708

Dear Chairpersons Nass and Ballweg:

I am writing on behalf of school principals, throughout Wisconsin, to strongly support Clearing House Rule 17-093. The proposed rule simplifies the licensing process, consolidates subject areas and adds needed flexibility.

School principals, with many other stakeholders, have been involved in developing these proposals over the last two-years and have testified how these proposals address their biggest frustrations with current rules.

Wisconsin students will be well served through the implementation of the carefully considered proposals advanced in CR 17-093.

Please feel free to contact me with questions at any time.

Sincerely,

A handwritten signature in black ink that reads 'Jim Lynch'. The signature is written in a cursive, flowing style.

Jim Lynch
Executive Director

To the Joint Administrative Rules Committee,

My name is Donna Hejtmanek and I am completing my 41st year as an educator. I have been a special education teacher, reading teacher, reading specialist, interventionist, and leader in my community for literacy. I am writing to express my concerns with the proposed rules revision for PI-34.

Teachers of reading have a daunting responsibility. Literacy instruction is complex; it must include systematic instruction, assessments, and ongoing diagnostic skills and the delivery of interventions if needed.

Having recently taking the FORT exam (2016) I am aware of the rigor of this test. This test is designed to verify the applicants' basic content knowledge and application skills in the foundational skills of reading that are necessary for successfully teaching all students.

Creating a Tier I license 34.028 parts (a) and (c) which provides broad exemptions from the WI-FORT, would be a great injustice to the 180,00 struggling readers in Wisconsin. A Tier I license will allow in and out of state graduates of an educator preparation program to be granted a license for one year and renewed indefinitely through a combination of teacher and district request without ever passing the WI-FORT. This lack of quality control will sacrifice Wisconsin students education by providing less than highly qualified teachers to serve our children.

34.028 (2) (d) addresses that a Tier I license will be granted to any graduate of an accredited school without passing the WI-FORT if a district deems it an "emergency" situation. Once again, the license can be renewed indefinitely without the teacher passing the WI-FORT and without the district seeking a fully licensed teacher. This provision allows a candidate to have no formal licensing criteria, fulfilling only the schools program requirements and with no further training. This ruling will minimize standards and "settle" for whoever shows up to interview. To compare this to health care, I certainly would not want my health care provider to be able to practice medicine without being held to standards of knowledge and practices. We would not sacrifice our health care to an inadequately licensed professional; but we are willing to sacrifice the educational welfare of our students.

Finally, 34.029 allows districts to train its existing teachers for a new position not covered by their current license. The districts may train their teachers without needing to pass the WI-FORT. Once again, teacher training by the district is not held to any standard and can potentially become a lifetime license without ever having to pass a test of proficiency. This essentially will remove any knowledge-based requirements that are standardized.

I find these proposed changes in the law a giant step backwards and a dumbing down of standards created in 2012, by the Read to Lead Task Force. It is more important than ever, that teachers are held to a high standard of knowledge that is

based on the passing of the WI-FORT. I ask that this committee reconsider the broad use of uncontrolled standards without the use of the WI-FORT. Our students deserve only the best.

Sincerely,

Donna Hejtmanek M.A., M.S. Ed
Kohl Teacher Fellowship Recipient 2016
Reading Teacher, Specialist

Julie Hapeman
3628 W Lakefield Dr.
Milwaukee, WI 53215

Members of the Joint Committee for Review
of Administrative Rules
2 E Main St.
Madison, WI 53703

Dear Committee Members,

Thank you for discussing the Wisconsin Department of Public Instruction licensure rules for orientation & mobility specialists. I have been a Certified Orientation & Mobility Specialist in Milwaukee for 24 years; I also hold a DPI license as a Teacher of Students with Visual Impairments (TVI) and a Certified Vision Rehabilitation Therapist (CVRT) and am working toward becoming a Certified Assistive Technology Instructional Specialist (CATIS). Blindness education is truly my life's work and I am keenly interested in any changes that will affect that work.

When I submitted testimony for the public hearings for the proposed changes in Wisconsin Department of Public Instruction (DPI) licensure, I suggested that Orientation & Mobility (O&M) Specialists should be categorized alongside TVIs, who will be granted lifetime licenses. My purpose in suggesting this is not because I believe in the value of lifetime licenses; I do not agree with this position. However, the body of knowledge required for an O&M Specialist to obtain DPI licensure is more akin to the requirements of TVIs and other educators in Subchapter VI and the O&M degree issued by many universities is a Master of Science in Education. It seemed to me to be a category better suited to O&M Specialists.

While my testimony was considered, it was decided that O&M licenses would continue to fall under the category of Related Service Providers (Subchapter X) and, in following suit with other related service professions, national certification would be required for DPI O&M license renewal. While this came as a surprise to me, I am very supportive of this change. National certification ensures a minimum standard of knowledge of skills in practitioners and requires continuing education of it certificants. Additionally, only those who hold national certification are allowed to supervise O&M interns from all but one of the university training programs in the United States. As someone who is certified, I have been, at times, overly called on to supervise interns because other O&M Specialists in SE Wisconsin are not certified.

While some may suggest requiring national certification will turn people away from coming to Wisconsin, I believe it will have the opposite effect. Having more Certified Orientation & Mobility Specialists will allow for more internship sites, showcasing more of the wonderful areas of our state. National certification is required by the majority of states and Wisconsin will not be the last state to consider this requirement.

Due to the fact that national certification has never been a requirement for DPI licensure, I support the reinstatement of the 6 credit option for license renewal, but only for those who currently hold DPI licenses. Going forward, I feel national certification should be required for all those seeking DPI O&M licenses and license renewals. The scope of the skills we practice includes teaching students who are blind to safely travel in the community, including crossing streets and using public transportation. Districts, CESAs, and other educational entities would be wise to look to a specifically designed certification body to determine if their service providers have and maintain a minimum level of competency.

I would be happy to discuss this further with any members of the committee. I have been actively involved our professional organization throughout my career and have created a network of professionals throughout the country who have helped shaped my beliefs on professionalism. Please feel free to call on me at any time.

Sincerely,

Julie Hapeman
Certified Orientation & Mobility Specialist
Certified Vision Rehabilitation Specialist
Teacher of Students with Visual Impairments
JHapeman@gmail.com
414-405-8332

In opposition to CR17-093

National Federation of the Blind of Wisconsin

Relating to the review of EmR1882 and Orientation and Mobility Professionals

To the Joint Committee on Administrative Rules

From the Office of the First Vice-President

1315 Mineral Point Avenue

Janesville, WI 53548

608-774-5557

w.dave@sbcglobal.net

Dear committee members. I am Dave Hyde, and currently serve as the vice-president of the National Federation of the Blind of Wisconsin. The National Federation of the Blind is a nation-wide organization of blind children adults and parents which believes in the inherent equality of blind and visually impaired people, and advocates for their needs around the country. I submit this testimony because of concerns raised by our members about this particular rule, and our concern that its adoption and enforcement would have deleterious effects upon the level and type of service available to children with a visual impairment.

Orientation and mobility is an essential service. This training teaches students and adults how to use tools such as long white canes and other equipment to get around their environment freely and successfully. The lack of this ability to travel independently impacts the ability to work, live independently, and to participate in community life. For this reason, any reduction in the number of orientation and mobility trainers would be disadvantageous to children with a visual impairment. Such a lack also has a direct effect on self concept, as others regard a student who is in constant need of assistance as a less desirable friend or companion.

All that being said, let us look more directly at this rule. It requires that orientation and mobility providers be licensed, and qualified. Well and good. This is a way of making sure that the child received quality training. What it does, however, goes much further than that. It says that organization The Academy for Certification of Vision Rehabilitation and Education Professionals (ACBREP) is the only body which may certify the professional credentials of an orientation and mobility instructor, and that failure to attend an university program which they have certified will bar a teacher in this vital field from teaching in our state.

This puts Wisconsin in the position of giving defacto

, if not dejour approval to any and all policies that ACVREP and its dependent universities may adopt, including teaching strategies, program content, attitudes and beliefs, along with their ideas about blindness and visual impairment.

I raise this because there are, in fact two certification agencies for instructors of Orientation and Mobility for students who are blind or visually impaired. The second is the National Blindness Certification Board. This organization, was developed to provide an alternative to the ACVREP certification, and teaches in a different manner. While the ACVREP model emphasizes the assistance available from sighted individuals, the National Orientation and Mobility Certification offered by the NBCB emphasizes Structured Discovery, in which the student is taught to emphasize problem solving skills and rely upon his/her own senses to work out of problems. Most people who are blind eventually learn to use a combination of these two approaches, but Structured Discovery tends to increase the self confidence of the student.

It is important that Wisconsin maintain and develop a sufficient number of orientation and mobility professionals to meet the needs of students in our schools. Since we do not currently have a program in our state to train these essential instructors, we need to be able to cast as wide of a net as we can to invite them to come to work in our state. It is not a good idea to limit ourselves to only one pool of potential instructors. The National Blindness Certification Board has for many years developed quality instructors. It differs from the ACVREP model of certification in that it requires its certified instructors to complete most of their training using the techniques which they will be teaching to their students. This means that they spend a good deal of time working under sleepshades or blindfolds, and not just during the time in which they are practicing with their canes. These professionals learn, by experience, the abilities of people who are blind or visually impaired, and know what they are able to do, because they have done it themselves. They come out of the training with an in depth and personal knowledge of blindness and visual impairment, and a personal experience of overcoming obstacles.

The ACVREP model does require some work under blindfold, but to a much lesser extent, and with a much lower intensity.

Finally, although the ACVREP model has many things to recommend it, it should not be adopted as the only model which orientation and mobility instructors may use. Allowing them to attend only such programs which are certified by ACVREP will have the long-term effect of limiting the number of these professionals in our state, at a time when many who have been in the field for a long time are contemplating retirement. This will result in fewer instructors serving more children. Unlike other things, the economy of scale does not work with one-on-one teaching, which is the way most orientation and mobility is taught in our schools.

We urge this Joint Committee to give serious consideration to expanding the pool from which orientation and mobility instructors may be drawn by allowing certification from both the ACVREP and the National Blindness Certification Board.



Wisconsin Institute for Learning Disabilities/Dyslexia, Inc.

DATE: 6/6/18

Ervin Carpenter
Co-Founder
Executive Director

Kim Carpenter
Co-Founder
Assistant Director

Jessica Edge M.A.
Clinical Director
Curriculum Coordinator

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Lori Meddings
Beau Smithback

Diagnostics Team

Hilary Schwartz
Dr. Courtney Bindrich
Dr. Paige Mission
Maggie Peebles M.A.
Kim Carpenter M.A.

TO: Joint Committee for Review of Administrative Rules (JCRAR)

FROM: Ervin A. Carpenter, Executive Director
Wisconsin Institute for Learning Disabilities/Dyslexia Inc. (WILDD)

SUBJECT: Testimony against adopting CR 17-0931 Revising CH. PI 34

Rep. Ballweg, Sen. Nass, and members of JCRAR thank you for holding a public hearing on CR 17-0931 Revising CH. PI 34. I appreciate the opportunity to testify in writing before you today.

My name is Ervin A. Carpenter and I am the Executive Director of the Wisconsin Institute for Learning Disabilities/Dyslexia Inc. (WILDD). I am a member of Congressman Mark Pocan's K-12 and Early Education Advisory Committee and also a member of the Wisconsin Reading Coalition. I am testifying today against revising Administrative Rule CH. PI 34 which, if changed, will send a clear message to our State and Private Universities that they do not have to teach our new teachers how to provide appropriate interventions and strategies to the language handicapped students in the State of Wisconsin.

I was excited when CH. PI 34 was implemented. It gave me, other teachers, and administrators hope that new teachers would demonstrate their ability to teach this population of students how to read and spell. Rep. Keith Ripp, from Assembly District 42, (R-Lodi) and many others worked hard to get this Administrative Rule passed so that many of our students in Wisconsin would be taught the way that many of us recommended during the passing of Read to Lead legislation in 2012. The one thing that we didn't take into consideration is that the universities would not do their part in teaching our new teachers the skills they needed to pass the Wisconsin Foundations of Reading Test (WI-FORT). When I reviewed the most recent State of Wisconsin stats on the number of teachers that are struggling to pass the WI-FORT I was dumbfounded. How could this be? I was saddened and in disbelief.

I graduated as a Special Education Teacher from UW-Oshkosh in the early 80's. Within the 128 credits, required for graduation and licensing, I was taught how to teach children to read using two approaches; Whole Language and Phonics based Direct Instruction, specifically, the Orton/Gillingham (OG) method. In the thirty years that I taught I found that eighty percent of the students learned well using the Whole Language approach while twenty percent needed the Phonics based Direct Instruction OG approach. That twenty percent was the target population that Read to Lead legislation was passed for. With the skills that I was provided by UW-Oshkosh I went on to teach all students how to read.

Using my example I fear that by giving these overly-broad exemptions from the WI-FORT we are simply giving the universities a pass on what they should be doing. The real issue is not the WI-FORT itself but the knowledge a teacher has to pass it. The test was meant to measure a teachers' skill level in initial teaching strategies needed to effectively teach twenty percent of the population who struggle to develop reading and spelling skills. A logical conclusion suggests that the critical skills being measured are not being taught in educator preparation programs at the university level.

Statute section 118.19 (14) currently requires new K-5 teachers, reading teachers, reading specialists, and special education teachers to pass the WI-FORT before getting an initial license to teach. The intent of the statute (passed in 2012 on a bipartisan vote following a recommendation of the non-partisan Read to Lead task force) was to enhance teacher quality by encouraging robust reading courses in educator preparation programs, similar to the education I received, and to ensure that beginning and struggling readers had an effective teacher.

I support the Wisconsin Reading Coalitions suggestion and encourage the committee to table the adoption of this permanent rule until it is amended to better support teacher quality standards and align with the intent of statute 118.19(14).

I also support that it is important that DPI set standards for reading instruction in educator preparation programs that encompass both the Standards for Reading Professionals (International Literacy Association) and the Knowledge and Practice Standards for the Teachers of Reading (International Dyslexia Association).

Please do not change Statute section 118.19(14) WI-FORT. 118.19(14) WI-FORT was an important step forward in Teacher Licensure in the State of Wisconsin. If you want to make a change please pass a bill requiring universities to train the teachers how to instruct students who are dyslexic and have learning disabilities (SLD). Passing CR 17-0931 Revising PI 34 will be a step backward. It is true that teachers are having a hard time passing this exam but it is because few institutions of higher learning are teaching them the skills to pass it. This revision gives teachers an exemption from the WI-FORT letting them, like so many before them, not teach the skills that are needed to teach dyslexic and SLD students how to read. It is important to maintain teacher quality. Please Do Not throw the baby out with the bath water!

Thank you again for the opportunity to testify and for your consideration of my input.

Ervin A. Carpenter

CHAN M. STROMAN
6809 Colony Drive
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June 7, 2018

Via email

To the Members of the Joint Committee for Review of Administrative Rules

Re: Clearinghouse Rule 17-093 (revising permanent rule PI 34)

Dear Senators and Representatives of the Joint Committee:

Thank you for scheduling the public hearing on PI 34 which will take place later this morning. Although I am unable to attend the hearing, I would like to submit the following statement for your consideration. I am also attaching a copy of the statement I made to this committee in its public hearing on November 8, 2017, on Emergency Rule 1711, which DPI is proposing to make permanent in CR 17-093, revising PI 34.

DPI represented to the U.S. Department of Education, in Wisconsin's ESSA plan, approved by the Secretary of Education in January 2018, that Wisconsin is "committed to improving the skills of teachers who work with students with low literacy levels. Wisconsin Statutes 118.19(14)(a) require prospective elementary, special education, reading teachers, and reading specialists to pass an examination identical to the Foundations of Reading test administered in 2012 as part of the Massachusetts Tests for Educator Licensure."

s. 118.19(14)(a) of the Wisconsin Statutes was enacted in 2012 by the Legislature by 2011 Wisconsin Act 166, and directed that DPI "may not issue an initial teaching license that authorizes the holder to teach in grades kindergarten to 5 or in special education, an initial license as a reading teacher, or an initial license as a reading specialist, unless the applicant has passed an examination identical to the Foundations of Reading test administered in 2012 as part of the Massachusetts Tests for Educator Licensure."

However, the text of PI 34 includes no reference to the Foundations of Reading test, and the only reference to s. 118.19(14)(a) is as a requirement for an existing license holder to qualify for early childhood education as an additional license area. Emergency rules 1711 and 1802 permitted and the revised PI 34 will permit licenses to be issued to K-5, special education and reading teachers and specialists who do not pass the Foundations of Reading test, contrary to the statute. This repeal by an unelected administrative agency of this legislatively enacted statutory requirement will be made permanent with PI 34, and will harm those students in Wisconsin who are most in need of qualified instruction. Thank you for your consideration of my comments.

Sincerely,



Chan M. Stroman

Licensure qualifications for educators who are permitted to teach Wisconsin's students have been significantly eroded with EmR1711. Emergency licenses have been issued under EmR1711 to applicants who have been unable to pass the Foundations of Reading Test, which is required under Wisconsin statute for the initial licensing of educators teaching elementary school, reading, and special education. The "stakeholders" referred to in the title of the emergency rule did not include any groups speaking for the interests of students. The educators, reading experts, and members of the public who provided public input and expressed their concerns about the emergency rule's weakening of teacher qualifications in the public hearing on the emergency rule and through public input on the state ESSA plan have been disregarded. In fact, the state ESSA plan drafted by DPI and submitted to the U.S. Department of Education does not disclose that the "licensure changes" alluded to in the plan will permit more teachers who would have not met licensing standards prior to the emergency rule to enter the classroom. There is no indication that evidence-based educational practice, or the disproportionate adverse effect on equitable access to qualified teachers, were considered in developing the emergency rule.

Moreover, EmR1711 raises particular concerns with respect to Wisconsin's racial achievement gap. While the achievement gap in reading between white and black students, as measured by average scale scores under the National Assessment of Educational Progress, narrowed nationally from 1992 to 2015, that gap widened in Wisconsin over the same period. Research has established that better training of teachers in reading will be necessary to move Wisconsin back on track, and yet the students who are most in need of adequately trained teachers to improve their reading achievement are often taught by teachers who are inexperienced, unqualified, or out-of-field. More than 83% of Wisconsin's black students were not proficient in English Language Arts on the 2016-17 Forward exam. DPI identified, in its Teacher Equitable Access Plan submitted to the U.S. Department of Education in 2015, that nine school districts in Wisconsin account for most of the disproportionate lack of access to qualified teachers, and two out of every three black students who failed to achieve proficiency under the Forward ELA assessment are students in those nine districts.

If the nine districts in which inequitable staffing is concentrated continue to rely on EmR1711 to waive existing licensure requirements for even more teachers, even more students in those districts will be taught by teachers who have not been adequately prepared to meet their students' needs. EmR1711 undercuts the efforts that Wisconsin should be making to increase achievement for disadvantaged students, and will continue to harm students who have been historically underserved in Wisconsin's classrooms.

June 6, 2018

Dear Representative Joan Ballweg, Co-Chair- Joint Committee on Administrative Rules,

The Wisconsin Reading Coalition informed the public about the opportunity to submit comments to the Wisconsin Legislature Joint Committee on Administrative Rules, for the June 7th public hearing, regarding the proposal to make current emergency rule changes permanent to teacher licensing rule PI-34. I would like to take this opportunity to discuss why codifying the proposed PI-34 rule changes (CR 17-0931) in the current form, will undermine the intent and ability of Statute S. 118.19 (14) to address poor teacher preparation in reading instruction, which is identified as a root cause of the literacy crisis in Wisconsin.

How and why colleges of education for decades contributed to the literacy crisis, not just in Wisconsin but across the nation, is a complicated subject which sparked hundreds of books and its own literary genre called "the reading war". Basically, the issue boils down to a debate over which method works best to teach reading - phonics or whole language (also called sight-word method or balanced instruction). Research overwhelmingly proves phonics-based instruction, when done correctly (i.e. early, explicit, direct, systematic phonics instruction), is the superior method for teaching *all* students to read. However, no matter which side of the 'debate' one is on, it is crystal clear - the states who recognized the veracity of colleges of education's role in the literacy crisis and took steps to ameliorate the problem by making sure teachers know how to bring phonics-based reading instruction into classrooms, such as Massachusetts by developing and implementing the original FORT exam, now post the highest reading proficiency rates in the country.

What works is obvious, phonics-based instruction, the remaining mystery of 'the reading war' is why so many colleges of education continue to teach versions of the whole language method. Casualties of this unresolved reading war are the thousands of children who fail to read proficiently due to improper reading instruction. Children who fail to read proficiently by third grade rarely catch up and will remain poor readers for life and poor reading skills condemns individuals to dysfunctional lives. Wisconsin children are among the states with the highest rates of reading failure due to poorly prepared teachers.

After public hearings and Governor Walker's Read to Lead Task force identified the causes and possible solutions to Wisconsin's literacy crisis, legislators took the bold step to enact Wisconsin Statute S. 118.19 in 2012. This law makes it mandatory for new K-5 teachers, reading teachers, reading specialists and special education teachers to pass the Wisconsin Foundations in Reading Test (WI-FORT) to become fully licensed to teach. (Note-teachers licensed prior to enactment of law S. 118.19 are exempt - possibly a compromise to gain law passage?)

Statute S. 118.19 was implemented in 2014 with the goal to achieve, in Wisconsin, the superior reading outcomes Massachusetts enjoys since they instituted the original FORT exam.

The expectation, purpose or intent of Wisconsin Statute S. 118.19 (14) is to:

(1) Compel colleges of education to examine and replace out of date curriculum with best practice reading instruction methods, since the effectiveness of a college program is made clear by first time passage rates of students taking WI-FORT.

(2) Protect aspiring teachers from college programs not up to date in best practice reading instruction methods; and ensure all teachers involved in reading instruction graduate prepared in best practice, scientifically vetted, reading methods, as demonstrated by passing WI-FORT, so teachers are equipped to produce the best reading outcomes for all students.

(3) Ensure all Wisconsin elementary and struggling students gain access to teachers who can provide up to date reading instruction and interventions known to help 95% of *all* students read successfully.

Unfortunately, many Wisconsin colleges of education simply refused to comply with updating their curriculums. DPI directly (or purposely?) contributed to this failure by not setting standards for best practice reading instruction to guide colleges on implementing the curriculum changes needed to prepare students to pass WI-FORT. This led to high rates of new teachers failing the WI-FORT and unable to get licenses to work.

Over the next several years, instead of providing leadership to help colleges of education improve their programs, DPI allowed colleges of education to remain noncompliant, and even abetted the colleges to flout the law by letting colleges hide poor first-time passage rates of students taking the WI-FORT. Hiding first-time passage rates impedes consumers from knowing if their college education dollars will be well spent to successfully pass the WI-FORT.

The emergency licensing changes to Rule PI-34 evolved from Wisconsin DPI's attempt to find a solution to its own negligence in not assisting colleges of education to update their programs to comply with Statute S. 118.19. DPI's failure to foster compliance with the law resulted in a glut of unemployable teachers due to lack of proper college preparation in the reading knowledge necessary to pass the WI-FORT to get licensed to teach. The DPI's supposed 'licensed teacher shortage' is self-inflicted. Or perhaps done on purpose (?) since it conveniently gives districts cover to avoid hiring 'licensed' teachers, then teachers who fail WI-FORT can become preferred hires, since they likely were taught debunked whole language methods districts may prefer.

Teachers who fail to pass the WI-FORT suffer financially due to their delayed entry into the workforce and incur costs for test prep and fees to retake WI-FORT exam. Teachers should not be punished for falling prey to colleges who left them unprepared to pass the WI-FORT. (Here is an article about a straight A student teacher unable to pass WI-FORT after 4 tries and what UW-Madison is doing to help: <http://www.wpta21.com/story/35211778/2017/04/Friday/wisconsin-teacher-shortage-the-test-holding-some-back>). However, children NEED teachers who are fully qualified to teach reading, because the window for effective reading acquisition is very narrow.

Apparently, DPI did begin writing standards years ago to guide colleges on teacher preparation for the WI-FORT, but DPI *never* completed nor shared these standards with colleges!

This follows a pattern of DPI negligence, disregard and selective instituting of new 'reading' policies, which could help bring phonic-based reading instruction into classrooms. For instance,

the Wisconsin Reading Coalition needed to point out to DPI the Common Core Standards guide distributed to Wisconsin teachers in 2014 was missing the entire section on phonics!

Instead of finishing a set of standards for colleges to use to update their curriculum and stop the flood of teachers unable to work due to inability to pass WI-FORT, DPI chose to focus on creating the series of emergency licensing changes to Rule - PI 34, to allow districts to hire teachers who failed to pass WI-FORT. DPI even designed the rules so provisional teachers who failed the WI-FORT can teach on renewable licenses without ever needing to pass the WI-FORT. This means: **If DPI's proposed emergency rule changes to PI-34 become permanent, the Statute S. 118.19's requirement to pass WI-FORT for teacher licensure will be effectively repealed.**

This is appalling news. If legislators allow the current emergency changes to rule PI-34 to become permanent, it will enable Wisconsin colleges of education to remain non-compliant with law S. 118.19, because it will take away the only incentive that will work to make colleges change - the WI-FORT exam.

The Wisconsin Reading Coalition outlined in its memo to the Legislative Joint Committee on Administrative Rules (see copy below), multiple ways legislators can restructure rule PI-34 to provide avenues for aspiring teachers who failed to pass WI-FORT to become provisionally employed to teach with **restrictions and supervision**, until these teachers can successfully pass WI-FORT and become fully licensed and qualified to teach reading. Legislators need to review and modify the current proposed changes to Rule PI-34 to preserve the Statute S. 118.19 requirement for successful passage of WI-FORT to earn full teaching licensure. PI-34 rules should also set a reasonable time frame for passing WI-FORT to be fully licensed or face consequences (i.e. more teacher preparation classes or loss of provisional teaching privileges).

Modifying rule PI-34 in this manner will provide fair relief to teachers harmed by colleges negligence in preparing teachers to pass WI-FORT and keeps intact the Statute S. 118.19 requirement to pass of WI-FORT for teaching licensure, which is needed to pressure colleges of education to change. Allowing Statute S. 118.19 to stand will let Wisconsin children enjoy higher reading proficiency rates as seen in states that successfully enacted similar laws.

Thank you for providing the opportunity to submit comments. It shows Wisconsin Legislators want to provide fair solutions and the leadership and guidance Wisconsin needs to accomplish the hard work to improve teacher preparation in reading, for our children's sake.

Respectfully,

Janet Monteith-Wong
3570 Bending Brae Ct., Brookfield WI 53005
262-790-8950 Janwong1@wi.rr.com

[1] Some Alarming Recommendations from the Wisconsin Leadership Group on School Staffing Challenges; February 7, 2017; Wisconsin Reading Coalition; <https://www.schoolinfosystem.org/2017/02/07/some-alarming-recommendations-from-the-leadership-group-on-school-staffing-challenges-inbox-x/>



From Wisconsin Reading Coalition

to Wisconsin Legislature Joint Committee on Administrative Rules

Request to Review CR 17-0931 Revising Ch. PI 34 on Teacher Licensing:

Teachers and more than 180,000 non-proficient, struggling readers* in Wisconsin schools need our support

- **Statute section 118.19(14) currently requires new K-5 teachers, reading teachers, reading specialists, and special education teachers to pass the Wisconsin Foundations of Reading Test (WI-FORT) before getting an initial license to teach.** The intent of this statute (passed in 2012 on a bipartisan vote following a recommendation of the non-partisan Read to Lead task force) was to enhance teacher quality by encouraging robust reading courses in educator preparation programs, and to ensure that beginning and struggling readers had an effective teacher. The WI-FORT is the same test given in Massachusetts, which has the highest 4th grade reading performance in the country. It covers basic content knowledge and application skills in the five components of foundational reading that are necessary for successfully teaching all students.
- **The revised teacher licensure rules presented by DPI in the revised administrative rule PI 34, create a new Tier I license that provides broad exemptions from the WI-FORT.**
- While we appreciate the legislature's and DPI's concerns with a possible shortage of teacher candidates in some subject and geographical areas, **we feel it is important to maintain teacher quality standards while moving to expand pathways to teaching.** We do not support extensive exemptions from the WI-FORT because this unnecessarily decreases teacher quality and harms students.
- **We encourage the committee to table the adoption of this permanent rule** until it is amended to better support teacher quality standards and align with the intent of statute 118.19(14).
- **We favor limiting the instances where the WI-FORT is waived** to those in which a district proves it cannot find a fully-qualified teacher to hire, and limiting the duration of those licenses to one year, with reading taught under the supervision of an individual who has passed the WI-FORT. Renewals should not be permitted except in case of proven emergency.
- **We favor having DPI set out standards for reading instruction in educator preparation programs** that encompass both the Standards for Reading Professionals (International Literacy Association) and the Knowledge and Practice Standards for Teachers of Reading (International Dyslexia Association). This will enable aspiring teachers to pass the WI-FORT and enter the classroom prepared to teach reading.
- **We favor having DPI implement a corrective action plan for educator preparation programs** where fewer than 85% of students pass the WI-FORT on the first attempt in any year. Students putting in four years of tuition and effort should be able to expect to pass the WI-FORT.
- **We favor allowing time for the Legislative Study Committee on Dyslexia to weigh in on this issue.**
- **The annual state Forward exam and the newly-released results of the 2017 National Assessment of Educational Progress (NAEP) highlight the importance of having high-quality teachers in Wisconsin classrooms.** 65% of our 4th graders were not proficient in reading on the NAEP. Our national ranking has slipped to 34th, and all sub-groups of students perform below their national averages. Our black students rank 49th among black students in the country, and our white students rank 41st.

As written, PI 34 provides the following exemptions from the WI-FORT that we find overly-broad:

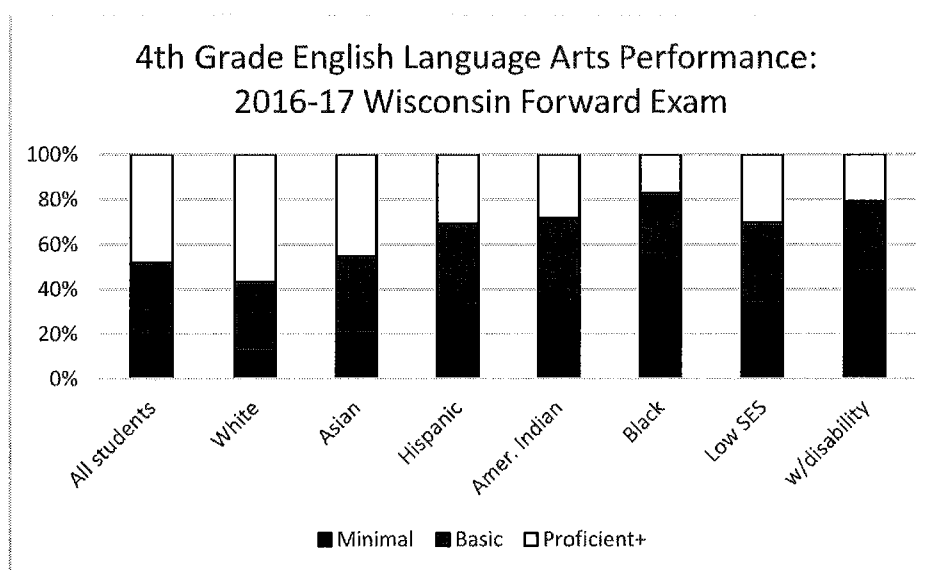
34.028 (2) (a) and (c) will allow an in-state or out-of-state graduate of an educator preparation program to become a teacher of record, with full responsibility for students, under a Tier I license without passing the WI-FORT. An employing district need not show a lack of fully-qualified applicants for the position. The Tier I license is granted for one year, but then may be renewed indefinitely under 34.028 (4) (a) and (b) through a combination of teacher and district request without the teacher ever passing the WI-FORT.

34.028 (2) (d) will grant a Tier I license to any graduate of an accredited college or university without passing the WI-FORT if an employing school district conducts a search for a full-licensed candidate, but cannot find an acceptable candidate. This is the “emergency” situation of teacher shortage under which a Tier I license might be justified, provided the district conducts a thorough search and explains why any fully-licensed candidates were not acceptable. This Tier I license is also granted for one year, but then may be renewed indefinitely under 34.028 (4) (c) without the teacher passing the WI-FORT and without any further requirement that the district seek a fully-licensed teacher.

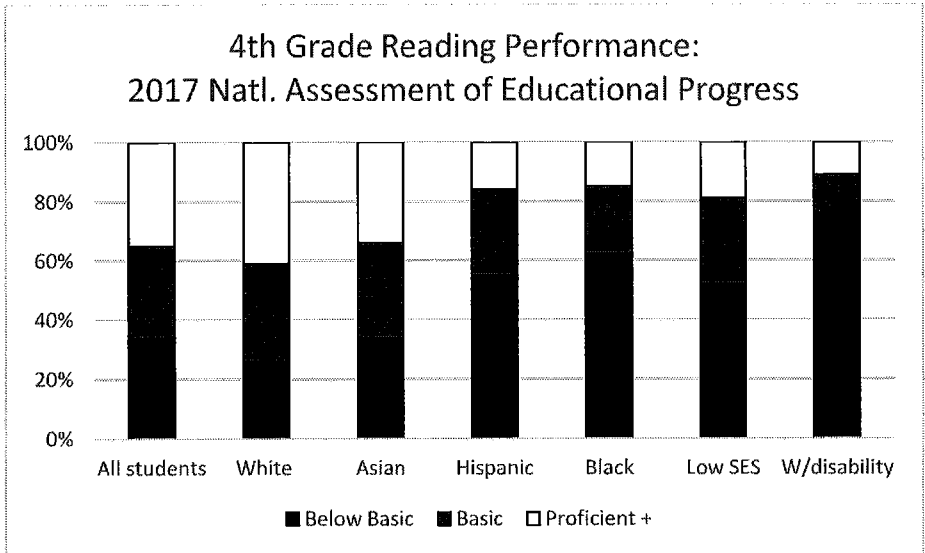
34.029 essentially allows districts to train their existing teachers (licensed under Tier I, II, III, or IV) for a new position not covered by their current license. The teacher is granted a Tier I license in the new subject or developmental level, and training consists of whatever professional development and supervision the district deems necessary. These teachers do not need to pass the WI-FORT, either at the beginning or conclusion of their training, even if their new position would otherwise require it. The district need not show that it cannot find a fully-licensed teacher for the position. This license is granted for three years, at which point the district may request a jump-up to a lifetime Tier III license for the teacher in this new position. District training programs may be as effective as traditional preparation programs in teaching reading content, but without the teachers taking the WI-FORT, there is no way to objectively know the level of their expertise.

**There are currently over 358,000 K-5 students in Wisconsin public schools alone.*

51.7% of Wisconsin 4th graders were not proficient in reading on the 2016-17 state Forward exam. Non-proficient percentages varied among student sub-groups, as shown below in red and black, and ranged from approximately 70-80% in the lower-performing districts to 20-35% in higher-performing districts.



65% of Wisconsin 4th graders were not proficient on the 2017 National Assessment of Educational Progress. Non-proficient percentages varied among student sub-groups, as shown below in red and black, and all shown sub-groups performed below the national averages for those sub-groups. Black students in Wisconsin were the 3rd lowest-performing African-American cohort in the country (besting only Iowa and Maine), and Wisconsin had the 5th largest black-white performance gap (tied with California and behind Washington, D.C., Iowa, Minnesota, and Illinois).



Ms. Cheryl Orgas
4222 N. Maryland Ave.
Shorewood, WI 53211

June 6, 2018

Dear Representative Ballweg, Senator Nass, and the Joint Committee on Review of Administrative Rules:

I am writing to oppose CR 17-093 as it now stands. I am asking that the National Orientation and Mobility Certification (NOMC) from the National Blindness Professional Certification Board also be included as an option for the certification of Orientation and Mobility Specialists.

The NOMC certification program is extremely thorough and takes into account the feedback from blind professionals who intimately understand the intricacies of training blind and visually impaired people to travel securely, safely, and independently. It is essential that blind people have strong travel skills to navigate the world in their school environments, in their communities, and in their employment.

At this time—when we have a shortage of Orientation and Mobility instructors—it is imperative that we not limit the certifications.

I ask you to include the National Orientation and Mobility Certification (NOMC) as the bill is adapted.

Thank you for your consideration.

Sincerely,



Cheryl Orgas
Treasurer
Wisconsin Parents of Blind Children



June 6, 2018

To: Chairpersons Senator Nass and Representative Ballweg and members of the Joint Committee for Review of Administrative Rules

I am writing regarding CR 17-093, the rule revision under consideration for PI 34. I represent the over 420 Superintendents leading Wisconsin school districts. I can tell you the proposal is universally supported by these leaders in their effort to address significant and growing workforce issues. I must also point out that Superintendents are currently operating under these proposed rule changes as a part of an Emergency Rule status. As such, these proposals have already demonstrated the ability to make a positive difference in meeting significant workforce availability and quality issues in districts.

This proposal results from a thoughtful, stakeholder inclusive process to address staffing challenges in districts across the state. It is an integrated, evidence-based policy approach to address Wisconsin's workforce issues in the teaching profession: statewide shortages (especially in rural areas); barriers to access to the field; inhibitors to career flexibility and sustainability; and maintaining relevant, coordinated and accessible high quality preparation programs.

While Superintendents support all aspects of the proposal – a tiered licensing system; restructured developmental levels; and innovative design for preparation programs, of particular importance to Superintendents are the flexibilities and candidate expanding aspects in the Tier 1 license. This will allow for a much needed district sponsored pathway to licensure, immediate licensure for out of state candidates, licensing for speech and language pathologists with a Department of Safety and Professional Services license and licensing for individuals coming into a district on an internship or residency status. These are effective, no-cost solutions to a significant workforce need in Wisconsin school districts.

This rule change brings critical flexibility and immediate responsiveness to the challenges outlined. Superintendents are not naïve or dismissive to the concerns expressed by some special area interest groups seeking to maintain status quo for individual sets of professional educator licenses or preparation. Indeed, all stakeholder groups, including the teaching profession, were universally clear they wanted strategies that maintained a priority on quality teaching in every classroom while addressing the current workforce crisis. Superintendents, along with the statewide stakeholder groups, believe this value has been preserved in these proposed rules. We ask for Committee approval.

Sincerely,

Jon R. Bales
Executive Director

Thank you for providing the opportunity for voices to be heard regarding education licensure for Orientation and Mobility (O&M) Instructors in Wisconsin.

The recent changes to licensure (a return to life licenses for educators) created a discrepancy for individuals who hold education-based licensure for O&M. O&M was not included in the life licensure category. O&M is a related service. It is a related service that is specifically linked to the Visually Impaired. Teachers of the Blind/Visually Impaired (TVI) licensure is now under life licensure and requires no renewal. O&M licensure renewal now contains two options; successful completion of an agency certification test and adherence to that agencies' guidelines OR completion of six credits. Either option also requires renewal of licensure through the Wisconsin Department of Public Instruction (DPI). Many individuals in WI hold both TVI and O&M licensure.

By choosing a single agencies guidelines, in this case the Academy for Certification of Vision Rehabilitation & Education Professionals (ACVREP), other certifying agencies in the field of visual impairment are being eliminated as professional options for the vision professionals in WI.

In addition, Wisconsin law states that in order to be eligible for DPI licensure in WI, individuals must have completed the Association for the Education and Rehabilitation of the Blind and Visually Impaired (AER) program in O&M. Currently that certification is held by approximately 50% of university programs that offer O&M coursework.

In past discussions, O&M licensure has been compared to licensure held by Occupational Therapists (OT), Physical Therapists (PT) and Speech and Language Therapists. O&M Instructors do not provide therapy. O&M Instructors are educators. They teach children who are blind and visually impaired safe and efficient travel skills, daily living skills, advocacy skills, provide recreational and social opportunities etc. The comparison is not a fair one.

I ask that you remove the ACVREP option for licensure for the O&M Instructors in Wisconsin. I ask that you remove the AER requirement for university O&M preparation programs verbiage from WI statutes.

There is a critical shortage of O&M Instructors (and TVI's) in Wisconsin and nationwide. Please eliminate some of the roadblocks that have been created for these educators in Wisconsin.

Thank you.

Kay Glodowski
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