FINAL REPORT
CLEARINGHOUSE RULE 17-093
CHAPTER PI 34
EDUCATOR LICENSES

Analysis by the Department of Public Instruction

Statutory authority: s. 115.28 (7) (a), Stats.

Statute interpreted: s. 115.28 (7) (a), Stats.

Changes to the administrative rule that governs educator licensing, PI 34, are the result of significant input from a diverse set of stakeholders throughout the state. The changes also implement new statutory language related to licensure as a result of the most recent biennial budget (2017 Wisconsin Act 59). The proposed rule changes are meant to make the licensing process more understandable and increase flexibility, while maintaining high-quality staff in Wisconsin schools. Key aspects of the proposed rule are:

- **Updates, clarifies and makes consistent the program approval process for both traditional and alternative route programs**. The new rule creates a standard, streamlined approach to approving educator preparation programs, while ensuring these programs provide our educators with high quality, rigorous training. (Subchapters II-IV).
- **Simplifies the licensing process**. The new rule creates a tiered approach to educator licensing, which will allow educators to obtain a license fitting their unique training and experience. (Subchapter V). Under this approach:
    - Tier I licenses are of limited duration and authorization, allowing school districts to meet short-term or specialized needs.
    - Tier II licenses are provisional licenses which allow new educators, out-of-state license holders, and other highly qualified individuals to start the progression to a life license.
    - Tier III licenses are life licenses for long-term educators.
    - Tier IV licenses are optional master educator life licenses for educators who meet additional rigorous requirements for quality and effectiveness.
- **Consolidates subject areas.** The new rule will provide districts more flexibility in staffing their schools by preparing educators to teach entire subject areas rather than just specialized subjects (e.g., science, social studies, music – Subchapter VI)
- **Adds flexibility.** The new rule allows highly-qualified license holders to add additional license areas, giving them access to new opportunities and helping school districts fill high demand assignments. (Subchapter IX)
- **Makes the educator misconduct process fairer and more efficient, effective, and transparent.** The new rule provides the DPI with additional tools to address educator misconduct, including license suspensions and reprimands. The new rule also adds transparency by requiring the Department of Public Instruction to post final decisions in all misconduct cases, giving schools and parents additional information. (Subchapter X)
- **Creates clarity.** The new rule uses standardized, simplified language and structure to make the rule clearer, more understandable, and shorter. As a result, the new rule is approximately two-thirds as long as the old rule.

The hearing notice was published in the December 26, 2017 edition of the Wisconsin Administrative Register. Public hearings for the rule were held on January 16, 2018, in De Pere, WI; January 17, 2018, in Madison, WI; January 19, 2018, in Milwaukee, WI; January 25, 2018 in Chippewa Falls, WI; and January 29, 2018, in La Crosse, WI.

The following persons testified at the January 16, 2018 hearing in De Pere, WI (some also provided written testimony as well):

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Sheila Kohl	Representing Self		X	
Reid Riggle	Wisconsin Association of Colleges for Teacher Education	X		
Paul Roup	Representing Self	X		
Robert Spice	Representing Self		X	
Francine Cook	Representing Self	X		
Randy Soquet	Representing Self		X	
Fran Renn-Malcheski	CESA 7	X		
Michael Malcheski	Representing Self		X	
Susan Ness	Representing Self	X		
Michelle Ring-Hanson	CESA 7	X		
Vanessa Moran	Representing Self			X
Sarah Jenson	Representing Self		X	
Dean DeBroux	WEAC		X	
Taku Ronsman	Representing Self	X		
Amy Brauer	Representing Self			X
Sarah Scott	Representing Self		X	

The following persons testified at the January 17, 2018 hearing in Madison, WI (some also provided written testimony as well):

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Leyla Sanyer	Wisconsin Music Educators Association		X	
Brad Schneider	Wisconsin Music Educators Association			X
Thomas Heninger	Representing Self		X	
Don Vruwink	Representing Self			X
Prisha Gustina	Representing Self	X		
Susan Chandler	UW-Whitewater Music Education Faculty		X	
Bill Chandler	UW-Whitewater		X	
Molly Carroll	Representing Self	X		
Kerry Kretchmar	Representing Self		X	
Barbara Gerloff	Representing Self		X	
Karla Gunn	Representing Self			X

The following persons testified at the January 19, 2018 hearing in Milwaukee, WI (some also provided written testimony as well):

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Chris Ligocki	Representing Self	X		
Katie Voss	Wisconsin Association of the Deaf	X		
Karen Dishno	Representing Self	X		
Lindalu Fox-Wheeler	Representing Self	X		
Cheryl Ward	Wisconsin Reading Coalition		X	
Chad Quamne	Representing Self	X		
Brittany Peters	Representing Self		X	
Tristann Rieck	Wisconsin Advocates for Music Education		X	
Cheryl Miracle	Wisconsin Music Educators Association			
Brandi Clauff	Wisconsin School Social Workers Association			X
Casey Thomm	Representing Self	X		
Layli McLaughlin	Representing Self		X	
Chris Taylor	Teachers at MSLS		X	
Terri Morris-Allen	Representing Self	X		
Lauren Watson	Representing Self		X	
Maria Nogueson	Representing Self	X		
Mary Bahr Schwenke	Wisconsin Speech-Language Pathology and Audiology Association		X	
Terry Burant	Marquette University Office of Teacher Education	X		
Katie Schmidt	Representing Self		X	
Stephanie Zito	Representing Self		X	
Amanda Vogel	Representing Self	X		

The following persons testified at the January 25, 2018 hearing in Chippewa Falls, WI (some also provided written testimony as well):

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Kevin Mason	UW-Stout		X	
Heather Klandermann	UW-Stout School of Education	X		
Carmen Manning	UW-Eau Claire Teacher Education Program	X		
John Humphries	Thorp School District		X	
Michael Harris	UW-River Falls		X	
Laura Dunbar	Wisconsin Music Education		X	

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
	Association			
James Erik Hendrickson	Self		X	
Dawn Koplitz	Educational Sign Language Interpreters		X	

The following persons testified at the January 29, 2018 hearing in La Crosse, WI (some also provided written testimony as well):

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
John Havlicek	Representing Self		X	
Elizabeth Javrin	Wisconsin Association of Environmental Education		X	
Mark Lakmann	Wisconsin Music Educators Association		X	
Peggy Wirtz-Olsen	Marshfield Teachers Association/WEAC		X	
Heather Linville	Representing Self	X		
Deborah Cromer	Representing Self		X	
Rob Dixon	Representing Self		X	
Rhett Hanson	Representing Self		X	
Jesse Martinez	Representing Self		X	
Mike Abler	Representing Self		X	
Scott Graham	School District of La Crosse		X	
Rick Stewart	University of Wisconsin-La Crosse	X		
Marcie Wycoff-Horn	University of Wisconsin-La Crosse		X	
Dawn Rouse	Representing Self			X
Julie Welch	Representing Self		X	
Alana Seddon	Representing Self		X	
Joyce Shanks	Representing Self		X	
Sara Cook	Viterbo University		X	
Tom Reidenbacher	Office for Catholic Schools	X		
Jenni McCool	University of Wisconsin-La Crosse			X
Ashley Cree	Representing Self			X
Betty DeBoer	Representing Self		X	
Jennifer Docktor	UW-La Crosse Secondary Teacher Education		X	
Adrienne Loh	Representing Self		X	
Jennifer C Voigt	Representing Self		X	
Teri Kendhammer	Representing Self		X	
Chad Wilkinson	Representing Self		X	
Eric Martin	Representing Self		X	

The following persons submitted written testimony:

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Janet Monteith-Wong	Representing Self		X	
Amanda Hicklin	Representing Self		X	
Nancy Reuter	Representing Self		X	
Christina Brey	Representing Self		X	
Roger Sheard	Representing Self			X
Robert Spice	Representing Self			X
Jessica Devine	Representing Self		X	
Susan McCallum	Representing Self		X	
Paige Kudlik	Representing Self		X	
John Fischer	Representing Self			X
Kim Wadas	Wisconsin Catholic Conference			X
Richard Kakouris	Representing Self		X	
Kelly Sullivan	Representing Self		X	
Kati Seiter	Wisconsin Music Educators Association		X	
Emily Smithback	Representing Self		X	
Lauren Lebwohl	Representing Self		X	
Barb Winger-Rourke	Representing Self		X	
Carolyn Markson	Representing Self		X	
Greg Devine	Representing Self		X	
Molly Grupe	Representing Self		X	
Melissa Rohrbeck	Representing Self		X	
Susan Judd	Representing Self			X
Christophor Rick	Representing Self		X	
Misty Winterling	Representing Self		X	
Cassandra Nabak	Representing Self		X	
Luann Dreifuerst	Wisconsin State Reading Association		X	
Becky Cohen	Representing Self		X	
Mary Ann Aspan	Representing Self			X
Dawn Koplitz	Representing Self			X
Katie Senger	Representing Self		X	
Christine Janusiak	Representing Self		X	
Alison VandeBerg	Representing Self		X	
Andrea Ciha	Representing Self		X	
Kirsten Eck	Representing Self			X
Kelly Beggs	Representing Self		X	

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Anne Ambrosius	Representing Self		X	
Becky Gowey	Representing Self		X	
Jousha Gowey	Representing Self		X	
Rebecca Schenzel	Representing Self		X	
Tim Kr	Representing Self		X	
Gerald Martin	Representing Self		X	
Joshua Beck	Representing Self		X	
Sarah Stelter	Representing Self			X
Tammy McVeigh	Representing Self		X	
Rebecca Wittemann	Representing Self		X	
Debra Bell	Representing Self		X	
Amy Bahena-Ettner	Representing Self		X	
Ron Natzke	Representing Self		X	
Kathleen Mahoney	Representing Self		X	
Stacy Lavongsa	Representing Self		X	
Renee Disch	Representing Self		X	
Cy Lavongsa	Representing Self		X	
Dyan Whitney	Representing Self		X	
Amanda VanRemortel	Representing Self		X	
Maria Rivera	Representing Self		X	
Nichole Grubbe	Wisconsin School Social Workers Association			X
Eric Runez	Representing Self	X		
Tamara Boornazian	Northcentral Technical College			
Jessi Falcon	Representing Self			X
Andrea Christianson	Representing Self		X	
Beth Sweeden	WI Board for People with Developmental Disabilities			X
Lucy Vue	Representing Self		X	
Patrick Jones	Representing Self			
Kandyce Hopgood	Representing Self			X
Karen Moore	Representing Self	X		
Lauren Thompson	Representing Self		X	
Michael Tamblyn	Representing Self		X	
Carl Hader	Representing Self		X	
Henry Leonard	Representing Self		X	
Jacqueline Gonzalez Mahr	Representing Self			X
Abigal Gawel	Representing Self		X	

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Roxanne Ciatti	Representing Self			X
Julie Hannon	Representing Self		X	
Tim Krause	Representing Self		X	
Roger Wetzel	Representing Self		X	
Ellynn Jagielo	Representing Self			X
Gordon Schumacher	Representing Self		X	
Sharon Schmeling	Wisconsin Council of Religious & Independent Schools			X
Tina Kohlman	Representing Self		X	
Stacy Kreyer	Representing Self		X	
Angela Flynn	Representing Self		X	
Derek Richmond	Representing Self		X	
Amy Anastasi	Representing Self		X	
Karisa Anderson	Representing Self		X	
Nicole Hunter	Representing Self		X	
Kelsey Schmutzer	Representing Self		X	
Tami Scott	Representing Self		X	
Katherina Verda	Representing Self		X	
Amy Lewin	Representing Self		X	
Barbara Blackmore	Representing Self		X	
James Russell	Representing Self		X	
Melissa Jacob	Representing Self		X	
Gayle Ebert	Representing Self		X	
John Horn	Representing Self		X	
Melissa Werner	Representing Self		X	
Ann Buehl	Representing Self		X	
Cris Parr	Representing Self		X	
Margo Schmidt	Representing Self		X	
Anne Nesgaard	Representing Self		X	
Tom Lueschow	Representing Self		X	
Sue Malone	Representing Self		X	
Sandra Severson	Representing Self			X
Mary Napp	Representing Self		X	
Tammy Krug-Pickart	Representing Self		X	
Corinne Fish	Representing Self		X	
Duane Draper	Representing Self		X	
Debra Kadon	Representing Self		X	
Megan Hartley	Representing Self		X	

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Kimberly Holze	Representing Self		X	
Rachel Kohn	Representing Self			X
Heidi Kirchberg	Representing Self		X	
Martha Fallis	Representing Self		X	
Laura Stoller	Representing Self		X	
Adrienne Thunder	Ho-Chunk Nation Language Revision	X		
Evan Gnam	Representing Self		X	
Kelli Jacobi	School District of Rhinelander	X		
Timothy Bonson	Representing Self			X
Sally Flaschberger	Disability Rights Wisconsin			X
Kathryn Cunningham	Representing Self		X	
Wesley Glenna	Representing Self		X	
Casey Thomm	Representing Self		X	
Madeline Laufenberg	Representing Self		X	
Renee Carlson	Representing Self		X	
Heather Cudworth	Representing Self		X	
Michelle Langenfeld/Jean Marsch	Green Bay Area Public School District			X
Kimber Wilson	UW System Deans and Directors of Teacher Education Programs			X
Carly Zacher	Wisconsin Registry for Interpreters of the Deaf			X
Kathy Shug	Representing Self			X
Tracy Allen	Wisconsin Registry for Interpreters of the Deaf		X	
Madeline Pamperin	Representing Self		X	
Kris Schumacher	Representing Self		X	
Earl Blodgett/Jamie Schneider/John Wheeler/Tim Buttles/Rachelle Haroldson/Michael Martin/Tyler Koepke/Joel Donna/Mike Harris	University of Wisconsin-River Falls Science Education Stakeholders		X	
Sara Tisler	Representing Self		X	
Lisa Schleicher	Representing Self		X	
Jodie Nigro	Wisconsin Registry for Interpreters of the Deaf		X	
Ali Bohl	Representing Self		X	
Sara Hanna	Representing Self		X	

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Jackie Hendrickson	Representing Self		X	
Maureen Ryan/Beth Sweeden/Kristin Kerschensteiner/Lisa Pugh	Survival Coalition			X
Tina Denning	Representing Self		X	
Martin Zacher	Representing Self		X	
Margaret Desch	Representing Self		X	
Sandy Mountain	Representing Self			X
Lori Connors	Representing Self		X	
Chan Stroman	Representing Self			X
Ray Scolavino	Wisconsin Society of Science Teachers		X	
Cheryl Ward	Wisconsin Reading Coalition		X	
Sondra Reynolds	Wisconsin Speech-Language Pathology and Audiology Association			X
Dan Rossmiller	Wisconsin Association of School Boards			X
Angela Seger	Representing Self		X	
Ron Martin	Wisconsin Education Association Council			X
Jennifer Ehrlich	Representing Self		X	
Anna Sieracki	Representing Self			X
Tamara Johnson	Representing Self		X	
Anthony Torti	Representing Self		X	
Jaime Keef	Representing Self			X
Eric Bartelme	Representing Self		X	
Renee Pionke	Representing Self		X	
Michael Walsh	Representing Self		X	
Jonathan Daugherty	Representing Self		X	
Ivy Otto	Representing Self		X	
Dale Jenkins	Representing Self		X	
Shane Kinnick	Representing Self		X	
Darsha Olsen	Representing Self		X	
Sandy Randall	Representing Self		X	
Emily Uriquizo	Representing Self		X	
Rafael Gomez	Representing Self			X
Kirah Zeilinger	Representing Self		X	
Renee Knoll	Representing Self		X	

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Lorinda Walters Flores	Representing Self		X	
Molly Walsh Anderson	Representing Self		X	
Kimber Wilkerson	UW-Madison School of Education			X
Susan Adams	Representing Self		X	
Leigh Wiitanen	Representing Self		X	
Patti Abraham	Representing Self		X	
Liz Kleba	Representing Self		X	
Timothy Schwaller	Representing Self		X	
Elizabeth Stofflet	Representing Self		X	
Colleen Griepentrog	Representing Self			X
Michelle Bradley	Representing Self	X		
Tracey Leider	Representing Self		X	
Gina Vogt	Representing Self		X	
Patrick Mans	School District of Crivitz	X		
Tim Herman	Representing Self		X	
Kevin Mason	UW-Stout B.S. in Science Education		X	
Rodney Figueroa	Pittsville School District	X		
Kyle Cronan	Port Edwards School District	X		
Bill Tourdot	Osseo-Fairchild School District	X		
Kelly Tourdot	Representing Self	X		
Jill Underly	Pecatonica Area School District	X		
Linda Erickson	Iowa-Grant Schools	X		
Craig Broeren	Wisconsin Rapids Public Schools	X		
David Bergerson	Representing Self		X	
Susan Schuller	Representing Self		X	
Shirley Hubbard	Representing Self		X	
Denise Michaelsen	Representing Self		X	
Melissa Schall	Representing Self		X	
Christine Pratt	Representing Self	X		
Brian Jackson	Wisconsin Indian Education Association (WIEA)			X
Sara Andrus	Sharon School District	X		
Daniel Minterf	Representing Self	X		
Tammy Sjoberg	Representing Self		X	
Holly Rohde	Representing Self	X		
Elizabeth Beere	Representing Self	X		
Deb Conyers	Representing Self	X		
Carole Mason	EAGLE School	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Cathleen Olds	Representing Self	X		
Martha Carver	Rock Prairie Montessori School	X		
Carolyn Heifner	Representing Self	X		
Chris Stubbe	Representing Self		X	
Polly Manske	Representing Self	X		
Laureanna Raymond-Duvernell	Representing Self		X	
Samantha Kueffler	Representing Self		X	
Holly Gertz	Representing Self		X	
Brian Barringer	Representing Self		X	
Kendra Liddicoat	Representing Self		X	
David Burg	Representing Self	X		
Jennifer Guzowski	Representing Self			X
Laurie Gharis	Representing Self		X	
Byron Holz	Representing Self			X
Jay Bullock	Representing Self			X
Lauren Kusch	Representing Self	X		
Bonnie Barker	Representing Self	X		
Robert Hughes	Representing Self		X	
Marsha Walejko	Representing Self	X		
Jordan Wood	Representing Self		X	
Amy Garvoille	Representing Self		X	
Robert Turner	Representing Self			X
Mary Wepking	UW Milwaukee School of Info Studies		X	
Melissa Myers	Representing Self	X		
Darren Hartberg	Representing Self		X	
Rachel Portinga	Representing Self		X	
Jan Knutson	Representing Self		X	
Dan Winkler	Representing Self		X	
Nathan Tranel	Representing Self			X
Betsy Parker	Representing Self		X	
Janet Monteith-Wong	Representing Self		X	
Skylar Primm	Representing Self		X	
Debra Moses	Representing Self		X	
Jackie Folak	Representing Self		X	
Kim Wahl	Representing Self		X	
Neil Micke	Representing Self		X	

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Sara Krauskopf	Representing Self		X	
Mark Kapocius	School District of Greenfield	X		
Alexandra LaBonte	Representing Self		X	
Brenna Holzhauer	Representing Self		X	
Daniel Zinsmeister	Representing Self		X	
Jessica Blatter	Representing Self		X	
Patricia Chapman	Representing Self		X	
Dylan Mathieu	Representing Self			X
Keith Burisek	Representing Self	X		
Noel VandeBerg	Representing Self	X		
Julie Grotophorst	Representing Self	X		
Simone DeVore	Representing Self			X
Daniel Bush	Representing Self			X
Steve Stoppelmoor	Representing Self	X		
Laura Love	Middleton-Cross Plains Area School District			X
Sherri Cyra	Middleton-Cross Plains Area School District			X
Debra Weitzel	Representing Self		X	
Beth Handler	Representing Self			X
Sunny Kim	Representing Self	X		
Hope David	Richfield Joint School District No. 1	X		
Catherine Bunke	Representing Self			X
Jim Lynch	Association of WI School Administrators	X		
Mary Newton	Representing Self		X	
Pamela Resech	Representing Self		X	
Marie Benson	Representing Self		X	
Jason Morgan	Representing Self	X		
Chad Harnisch	Representing Self	X		
Kevin Shetler	Representing Self	X		
Shelly Thomas	Representing Self	X		
Ken Kassees	Representing Self	X		
Nicole Jones	School District of New Berlin	X		
William Loss	Representing Self		X	
Doreen Treuden	Representing Self	X		
Gary Kiltz	Greendale School District	X		
Monica Warnke	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Korrin Gumieny	Representing Self	X		
Jennifer Metzer	Representing Self		X	
Cathy Techtmann	Representing Self		X	
Brian Farrell	Representing Self	X		
Lynn Curry	Representing Self		X	
Vince Breunig	Representing Self	X		
Bernie Rocheleau	Representing Self		X	
Barbara Buffington	DeForest Area School District	X		
Eileen Schroeder	Representing Self		X	
Virginia Carlton	Representing Self		X	
Larry Haase	Representing Self	X		
Cindy Lindquist	Representing Self		X	
Rachel Zidon	Representing Self		X	
Heather Merewood	Representing Self		X	
Karen Wendorf-Heldt	CESA 9	X		
Amanda Zbacnik	Representing Self		X	
Christine Dean	Representing Self	X		
Conrad Farner	Representing Self	X		
Aaron Andres	Representing Self	X		
Corry Lambie	Representing Self	X		
Nate Schurman	Representing Self	X		
Paul Schwaller	Representing Self	X		
Lisa Schreiner	Representing Self	X		
Scott Werfal	Representing Self	X		
Joe Beine	Representing Self	X		
Jeff Kasuboski	Wautoma Area School District	X		
Scott Greupink	Representing Self	X		
David Harper	Representing Self	X		
Colin Green	Representing Self	X		
Paul Johnson	Representing Self	X		
Matthew Amerson	Representing Self	X		
Stephanie Moore	Representing Self	X		
Tracy Deavers	Edgerton School District	X		
Heather Goldberg	Representing Self	X		
Rachel Wimer	Representing Self	X		
Kenneth Lasure	Representing Self	X		
Jeremy Pach	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Jeffrey Walsh	Representing Self	X		
Kimberly Torkelson	Representing Self	X		
Steven Gromala	Representing Self	X		
Dave Schwarz	Representing Self	X		
Jeffrey Rykal	Representing Self	X		
David Desmond	Representing Self			X
Ann Smejkal	Representing Self	X		
Anne Pingel-Nichols	Representing Self	X		
Kris Hucek	Representing Self	X		
Cheryl Schenk	Representing Self	X		
Marc Lehnerer	Representing Self	X		
Steve Sukawaty	Representing Self	X		
Kirk Delwiche	Representing Self	X		
Machell Schwarz	Representing Self	X		
Brian Johnsen	Representing Self	X		
Scott Erlandson	Representing Self	X		
Rich Moyer	Representing Self	X		
Dave Michalkiewicz	Representing Self	X		
Michael Leach	Representing Self	X		
Barb O'Brien	Representing Self	X		
Dean Nemoir	Representing Self	X		
Charles Urness	Representing Self	X		
Aaron Mithum	Representing Self	X		
Christopher Nyman	Representing Self	X		
Jon Fleming	Representing Self	X		
Anthony Sweere	School District of Hilbert	X		
Jason Sinz	Representing Self	X		
Brad Grayvold	Representing Self	X		
Jeanne Siegenthaler	Representing Self	X		
Lee Mierow	Wrightstown Middle School	X		
Brenda Turner	Representing Self	X		
Erin Hansford	Frederic 6-12 School	X		
Kelly Collins	Peshtigo School District	X		
Jill Ries	Representing Self			X
Ken Kortens	Representing Self	X		
Tim Conway	Representing Self	X		
Liz Pulvermacher	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Cynthia Lacey	Representing Self	X		
Melissa Horn	Representing Self	X		
Carmen Burkum	Representing Self	X		
Elizabeth Dostal	AWSA	X		
Michelle Johnson	Representing Self	X		
Scott Benoy	Representing Self	X		
Michelle Louis	Representing Self	X		
Kevin Moore	Representing Self	X		
Salina Thistle	Representing Self	X		
Mike Roddick	Representing Self	X		
John Hokenson	Representing Self	X		
Robin Taylor	Representing Self	X		
Terri Schultz	Representing Self	X		
Bart Boettcher	Representing Self	X		
Paul Weber	Representing Self	X		
Julie Laabs	Representing Self	X		
Chad Schraufnagel	Representing Self	X		
Bonnie Olson	Representing Self	X		
Tara Czerwinski	Representing Self	X		
David Elliott	Representing Self	X		
Paul Franzwa	Representing Self	X		
John Meznarich	Representing Self	X		
Josh Chudacoff	Representing Self	X		
Hans Schmidt	Representing Self	X		
Gary Syftestad	New Lisbon School District	X		
Kathy Van Pay	Representing Self	X		
Patrick Gretzlock	Representing Self	X		
Lori Verhagen	Representing Self	X		
Kristi Gonzalez	Representing Self	X		
Kimberly Crosby	Representing Self	X		
Beverly Schewe	Representing Self	X		
Jane Bremer	Representing Self	X		
Becky Newcomer	Representing Self	X		
Ann Schoenberger	Representing Self	X		
Meloney Markofski	Representing Self	X		
Emily Greiber	Representing Self	X		
Stacy Knapp	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Mitch Wainwright	Mineral Point School District	X		
Brian Annen	Representing Self			X
Kyle LeMieux	Representing Self	X		
Connie Haessly	Representing Self	X		
Jennifer Lawler	Representing Self	X		
Peter Kittel	Representing Self	X		
Shelley Shirel	Representing Self	X		
Charles Eaton	Representing Self	X		
Stephen Paske	Representing Self	X		
Dennis Kaczor	Herman Neosho Rubicon School District	X		
Chris Kluck	Representing Self	X		
Matt Peterson	Representing Self	X		
Phill Klamm	Representing Self	X		
Kyle Walsh	Representing Self	X		
Tom Mueller	Representing Self	X		
Paul Cooney	Representing Self	X		
Jonathan Sprehn	Representing Self	X		
Myra Misles-Krhin	Representing Self	X		
Richard Amundson	Representing Self	X		
scott swenty	Representing Self	X		
Sharon Thiede	Representing Self	X		
Nathan Black	Representing Self	X		
Michele Yates-Wickus	School District of Mauston	X		
Steve Schroeder	Representing Self	X		
Todd Hencsik	Campbellsport School District	X		
Dean Kaminski	AWSA	X		
Laura Stunkel	Representing Self	X		
James Kamoku	Representing Self	X		
Paul Brost	Representing Self	X		
Guy Steckbauer	Representing Self	X		
David Brokopp	Representing Self	X		
Todd Saner	Representing Self	X		
Steve Gruszynski	Representing Self	X		
Joseph Svitak	Representing Self	X		
Thomas Henning	Representing Self	X		
Jack Knaack	Representing Self	X		
Ken Abel	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Tami Bagstad	Representing Self	X		
Shane Dornfeld	Representing Self	X		
Josh Kestell	Representing Self	X		
Trish Sheridan	School District of Somerset	X		
James Reif	Representing Self	X		
Julie Lynch	Representing Self	X		
Neil Hall	Representing Self	X		
Jennifer Thayer	Representing Self	X		
Anne Heck	Representing Self	X		
Pete Apple	Representing Self	X		
Brian Kersten	Waunakee Community High School	X		
Danelle Schmid	Representing Self	X		
Lisa Andresen	Representing Self			X
Jacqueline Iseler	Representing Self	X		
Glenda Oginski	Representing Self	X		
Mary Juckem	Representing Self	X		
Jay Posick	Representing Self	X		
Tammy Gibbons	Representing Self	X		
Kym Buchanan	UW-Stevens Point School of Education	X		
Marty Van Hulle	Representing Self	X		
Lynda Fernholz	Representing Self		X	
Patrice Tronstad	Representing Self	X		
Jeremy Solin	Representing Self	X		
Michael Olsen	Representing Self		X	
Richard Flaherty	Representing Self	X		
Pamela Bork	Representing Self			X
Matt Paulsen	Representing Self	X		
Kathleen Hauser	Representing Self		X	
Rachel Amundson	Representing Self	X		
Rick Grable	Representing Self	X		
Cheryl Carlin	Representing Self	X		
Tracy Stevenson-Olson	Representing Self	X		
Margaret Holloway	Representing Self	X		
David Allen	Representing Self	X		
Kelly Halvorsen	Representing Self	X		
Katie Breidel	Representing Self	X		
Keith Schneider	School District of Cambridge	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Michael Vuolo	Representing Self	X		
Barry Schmitt	Independence School District	X		
Steven Olson	Representing Self	X		
Debra Moore-Gruenloh	Representing Self		X	
Jacqueline Coghlan	Representing Self	X		
Ken McCormick	Representing Self	X		
Aaron Sime	Representing Self	X		
Tom Griesemer	Representing Self	X		
Karen Mengel	Representing Self	X		
Tara Webster	Representing Self	X		
Kory Rud	Representing Self	X		
Peggy Jones	Representing Self	X		
Kathy Twaroski	Representing Self		X	
Valerie Hodgson	Representing Self		X	
Sherry Craig	Representing Self		X	
Mary Kramer	Representing Self	X		
Mark Bingham	Representing Self	X		
Tony Logue	Representing Self	X		
Alyssa Haug	Representing Self	X		
William Huebsch	Representing Self	X		
Nicholas Anton	Representing Self	X		
Jim Heinke	Representing Self	X		
Tobias Barske	University of Wisconsin Stevens Point		X	
Rebecca Zahn	Representing Self	X		
Nic Been	Representing Self	X		
Jerry Jessee	University of Wisconsin Stevens Point		X	
Dan Keyser	Representing Self	X		
Jenny Keats	Representing Self	X		
Melissa Toshner	Representing Self	X		
Lisa Misco	Representing Self	X		
Stacy Klemm	Representing Self	X		
Dan Halvorsen	Representing Self	X		
Erin Siedschlag	Representing Self	X		
Cassy Lehman	Representing Self	X		
Bethany Talledge	Representing Self	X		
Melissa Murray	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Joe Schroeder	Representing Self	X		
Penny Antell	Representing Self		X	
Sue Murphy	Representing Self	X		
Marisa Lombardo	Representing Self	X		
Luke Sadowski	Representing Self	X		
Scott Schimmel	Representing Self	X		
Kasie Sattler	Representing Self	X		
Michele Armentrout	Representing Self	X		
Lewis Malczewski	Representing Self	X		
Quiana Polk	Representing Self	X		
Courtney DeArmond	Representing Self	X		
Scott Huff	Representing Self	X		
Kristen Langer	Representing Self	X		
Keri Holter	Representing Self	X		
Lucas Barth	Representing Self	X		
Alice Redalen	Representing Self	X		
Paul Wilson	Representing Self	X		
Michael Kurtz	Representing Self	X		
Michael Zibell	Representing Self	X		
Brad Potter	Representing Self	X		
Paula Heun	Representing Self	X		
David Roeglin	Representing Self	X		
Christine Klumpers	Representing Self	X		
Randy Bartels	Representing Self	X		
Arrin Woller	Representing Self	X		
Steven Strasman	Representing Self	X		
Sue Doyle	Representing Self	X		
Torrie Rochon-Luft	Representing Self	X		
Nicole Zwiers	Representing Self		X	
Wade Pilloud	Representing Self	X		
Starlynn Daley	Representing Self	X		
Jim Karedes	Delavan-Darien School District	X		
Jennifer Zimmerman	Representing Self		X	
Nick Skretta	Representing Self	X		
Donna Pasternak	Representing Self		X	
Jennifer Fanning	Representing Self	X		
Mary Begley	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Julianne Hargarten	Representing Self		X	
Mark Demuth	Representing Self	X		
Colleen Berkhahn	Representing Self	X		
Paul Hermes	Representing Self	X		
Mark Porter	Representing Self	X		
Tim Wester	Representing Self	X		
Susan Tinker	Representing Self		X	
Brenda Degenhardt	Representing Self		X	
Mark Supa	Representing Self	X		
Jolene Terrones	Representing Self	X		
William Tourdot	Representing Self	X		
Judith Winn	Representing Self		X	
Tim Wright	Representing Self			X
Thomas Burkhalter	Representing Self	X		
Bev Sturke	Representing Self	X		
Elizabeth LaNou	Representing Self	X		
Melissa Olson	Representing Self	X		
Kirsten Lathrop	Representing Self	X		
Theresa Burant	Representing Self	X		
Karen Wydeven	Representing Self		X	
Anna Curtis	Representing Self	X		
Joshua Ketterhagen	Representing Self	X		
Mary Hoefferle	Representing Self			X
Hope Longwell-Grice	Representing Self		X	
Kim Marsolek	Representing Self		X	
Terri Morris-Allen	Representing Self	X		
Janitra Thomson	Representing Self	X		
Jeff Holub	Deaf Grassroots Movement	X		
Rebecca Franzen	Representing Self		X	
Eric Brinkmann	Representing Self	X		
Jordan Sinz	Wisconsin Heights School District	X		
Joe Zydowsky	Representing Self	X		
Brett Stousland	Barneveld School District	X		
Daniel Olson	Monona Grove School District	X		
Penny Boileau	Representing Self	X		
Robert Eidahl	Representing Self	X		
Steve Kolden	Colby School District	X		
Robert Houts	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Amy Van Deuren	Representing Self	X		
Michael Garrow	Fall River School District	X		
Timothy Micke	Representing Self	X		
Barry Rose	Cumberland School District	X		
Ronald Saari	Potosi School District	X		
Michael Weber	Port Washington-Saukville School District	X		
James Heiden	School District of Cudahy	X		
Dominick Madison	Representing Self	X		
Aaron Sadoff	School District of North Fond du Lac	X		
Bob Berndt	Representing Self	X		
Steven Bloom	Representing Self	X		
Denise Wellnitz	Darlington Community School District	X		
John Knight	Drummond Area School District	X		
Chris Conohan	Representing Self	X		
Martin McGinley	Wheatland J1 School District	X		
Blake Peuse	St. Francis School District	X		
Bryce Bird	Riverdale School District	X		
Vivian Heatwole	Representing Self	X		
Jane Wonderling	Fennimore Community Schools	X		
Dennis Pauli	Representing Self	X		
Tom Andres	Benton School District	X		
Aaron Engel	Gale-Ettrick-Trempealeau School District	X		
Mary Whitrock	Ripon Area School District	X		
Leonard Lueck	Brodhead School District	X		
Bruce Quinton	Pepin Area Schools	X		
Samantha Hoyt	Representing Self	X		
Terry Reynolds	School District of Tomahawk	X		
Cherryl Knowles	Representing Self	X		
Benjamin Rayome	Tigerton School District	X		
Lawrence Ferguson	Arcadia School District	X		
Susan Kaphingst	Representing Self	X		
Craig Gerlach	Representing Self	X		
Lynn Davies	Representing Self	X		
James Smasal	Kewaskum School District	X		
Bob Lloyd	Lomira School District	X		
Wayne Weber	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Thomas Benson	Representing Self	X		
William Chambers	School District of Black Hawk	X		
Scott Woodington	Representing Self	X		
John Gaier	School District of Neillsville	X		
Jim Boebel	Adams-Friendship Area School District	X		
Julie Krackow	Representing Self	X		
David Boland	Seneca Area School District	X		
Barbara Sramek	Representing Self	X		
David Munoz	Menomonie High School	X		
Doug Olsen	Kickapoo Area School District	X		
Brandon Robinson	Unity School District	X		
Cindy Zahrte	Tomah Area School District	X		
Caleb Hundt	Representing Self	X		
Lori Smith	Representing Self	X		
Jason Tadlock	Elkhorn Area School District	X		
Scott Sabol	Mayville School District	X		
Ed Brzinski	Waterford Graded School Dist. #1	X		
Judy Mueller	Franklin Public Schools	X		
Patrick Sturzl	School District of Bruce	X		
Ronald Walsh	Plum City School District	X		
Mark Anderson	Representing Self	X		
John Sample	Merrill Area Public Schools	X		
Christine Damm	Representing Self	X		
Will Richter	Representing Self			X
Nancy Hendrickson	Representing Self	X		
George Mavroulis	Middleton-Cross Plains Area School District	X		
Eric Wright	Representing Self	X		
Charles Poches	Portage Community School District		X	
James Brewer	Representing Self	X		
Lolli Haws	Racine Unified School District	X		
Eric Gallien	Racine Unified School District	X		
Jean Serum	Northwood School District	X		
Lisa Quistorf	Two Rivers Public Schools	X		
Mary Lofy Blahnik	School District of Sheboygan Falls	X		
Steve Pophal	Representing Self	X		
Tom Rich	Prairie Farm School District	X		
Kelly Thompson	Representing Self	X		
Michael Trimberger	School District of Random lake	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Mary Churchill	Representing Self	X		
Scott Johnson	Representing Self	X		
Kevin Bruggink	School District of Oostburg	X		
Sara Norton	Fontana J8 School District	X		
Jeff Eide	Blair-Taylor	X		
Chris Hahn	Representing Self	X		
Gary Cumberland	Representing Self	X		
David Botz	Little Chute Area School District	X		
Samantha Polek	Representing Self	X		
Ann Haack	Elkhart Lake-Glenbeulah School District	X		
John Smith	Representing Self	X		
Newell Haffner	Gresham School District	X		
Dan Thielen	Representing Self	X		
Patricia Deklotz	Kettle Moraine School district	X		
Deborah Winkler	Representing Self	X		
Steven Sedlmayr	Representing Self	X		
Kaari Olson	Representing Self	X		
Julie Landry	Representing Self	X		
Deon Michels-Bowe	Representing Self		X	
Richard Hanson	Representing Self	X		
Cory Hinkel	School District of Luck	X		
David Bridenhagen	School District of Shell Lake	X		
Laura Myrah	Arrowhead Union High School	X		
Randy Refsland	Representing Self	X		
Joe Leschisin	Cameron School District	X		
John Thomsen	Representing Self	X		
Ben Pytleski	Lena Public School District	X		
Lourdes Lasanta	Representing Self	X		
Margaret "Peggy" Larson	Winneconne Community School District	X		
Jarred Burke	Representing Self	X		
Damian LaCroix	Howard-Suamico School District	X		
Robert Smudde	Representing Self	X		
Kim Eparvier	Peshtigo School District	X		
Betty Norris	Representing Self			X
Eric Russell	Baldwin-Woodville Area School District	X		
Lori Mueller	Representing Self	X		
Bill Kinziger	Ripon Area School District	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Diane Johnson	Representing Self	X		
Jeff Nelson	Grafton School District	X		
Robert Wittke	Racine Unified School District	X		
James Kuchta	School District of Amery	X		
Brian & Hanes	Representing Self	X		
Aaron Tarnutzer	Representing Self	X		
Timothy Raymond	Cambria-Friesland School District	X		
Renee Bunge	Representing Self	X		
Jean Johansen	Representing Self	X		
Michelle Garvey	Representing Self	X		
Korinne Haeffel	U.S. Green Building Council			X
Victoria Colle	Representing Self	X		
Kelly Pickett	Representing Self		X	
Kathy DeBoth	Representing Self	X		
Mara Branch	Representing Self	X		
Lindalu Fox-Wheeler	Representing Self		X	
Joel Donna	University of Wisconsin - River Falls - Science Education Stakeholder Group		X	
Stacie Burse	Representing Self	X		
Sydney Kittoe	Representing Self	X		
Tamara Schick	Representing Self		X	
Elizabeth Briski	Representing Self	X		
Donelle Scaffidi	Representing Self		X	
Lowell Dean Sauers	Representing Self		X	
Katie Halverson	Representing Self	X		
Emily Steinwehe	Representing Self		X	
Angie Brunett	Representing Self	X		
Brittany Peters	Representing Self		X	
Amy McGovern	Representing Self		X	
Patricia Greco	School District of Menomonee Falls	X		
Amy Workman	Representing Self		X	
Timothy Kuhman	Representing Self		X	
Brent Burton	Representing Self		X	
Katie Miller	Representing Self	X		
Jeanne Courneene	Representing Self	X		
Jeff Petersen	Representing Self	X		
Melissa Friel	Representing Self		X	
Barbara Bales	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Marc Heuer	Representing Self	X		
Sara Mallegni	Representing Self	X		
Mike Eversoll	Representing Self	X		
Vicky Happe	Representing Self	X		
Anne Bartels	Representing Self		X	
Niki Espy	Neighborhood House of Milwaukee		X	
alison ford	Representing Self		X	
Catherine Scheder	Representing Self	X		
Chris VanderHeyden	Menasha Joint School District	X		
Jim Kramer	Representing Self	X		
Megan Litster	Representing Self		X	
Barbara Dixson	Representing Self		X	
James Sanger	Representing Self		X	
Allison Hoch	Representing Self	X		
Christopher Boyd	Representing Self		X	
Sandy Keller	Representing Self			X
Jamie Mollica	Representing Self		X	
Diana Moran Thundercloud	Representing Self		X	
Dorothea Ledin	Representing Self		X	
Scott Ashmann	Representing Self	X		
Carol Troyer-Shank	Representing Self		X	
Tanya Kotlowski	Representing Self	X		
Mark Hansen	School District of Elmbrook	X		
Molly Sanders	Representing Self	X		
Anastasia Heckendorf	DPI/WESP-DHH	X		
Philip Beck	Hewitt-Texas Elementary School	X		
Mike Kosmalski	Representing Self		X	
Rosalie Daca	Representing Self	X		
Julie Hapeman	Representing Self		X	
Cathy Broadway	Representing Self	X		
Joy Perry	Representing Self		X	
David Eagan	Representing Self		X	
Traci Davis	Juda School District	X		
Bill Fisher	Elcho School District	X		
Susan Bilda	Representing Self		X	
John Lehnen	North Cape School District	X		
Scott Anderson	Representing Self		X	
Timothy Bauman	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Stacie Sheppard	Representing Self		X	
Rebecca Stephens	UWSP		X	
Terry Daulton	Representing Self		X	
Jon Bales	WASDA	X		
Tanzeem Ali	Representing Self		X	
Walter Leipart	Gilman School District	X		
Michael Harris	UW-River Falls College of Education and Professional Studies		X	
Gay Ward	Representing Self			X
Pamela Sue Conine	Representing Self			X
Cara Erickson	Representing Self		X	
Randy Champeau	Representing Self		X	
Sandra Benton	Representing Self		X	
Cindy Duley	Representing Self	X		
Melina Papadimitriou	University of Wisconsin - River Falls and Wisconsin Montessori Association			X
Deirdre HargroveKrieghoff	Madison Metropolitan School District	X		
Dan Stuntebeck	Representing Self		X	
Donna Struck	Representing Self	X		
Meghan Fredel	Representing Self		X	
Patrick Lawrence	Representing Self		X	
Megan Lawrence	Representing Self		X	
Stephanie Halverson	Representing Self	X		
Emma Wilkinson	Representing Self	X		
Melanie Schneider	Representing Self		X	
Joseph Montaine	Representing Self		X	
Sara Croney	School District of Maple	X		
Beth Johnson	Representing Self		X	

The total number of individuals, organizations represented, and speakers in favor of and against the rule are as follows:

INDIVIDUAL RESPONDENTS	ORGANIZATIONS REPRESENTED	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
887 Individuals	167 Organizations	493 (55.6%)	322 (36.3%)	73 (8.2%)

Summary of public comments relative to the rule and the agency's response (bolded) to those comments:

1. A number of respondents spoke to various matters regarding licenses, stages, and bands, including the following:

A. Some individuals argued against the Department's proposed change to single, "broad field" license for music, noting that:

a) Preparation under a consolidated music license would mean that music education students would have to take additional methods courses to be prepared to teach in their assignment area, in addition to an already high credit requirement for graduation, which will add to an already maxed-out credit load and negatively impact student teaching time.

   The rule proposal does not impact credit requirements for graduation from teacher education programs. Institutions of higher education establish credit requirements. The Department looks for programmatic outcomes in approving programs, not credit hours. As a result, no conclusion can be drawn regarding the number of credits required for graduation under the proposed rule.

b) Additionally, rather than allowing music students to focus on their strengths or interests, music programs would have to amend current instruction and "cut corners" to produce educators at a reasonable rate, which would not necessarily increase the quality of educators they produce, if the change does not already discourage a number of prospective music education students from entering the field.

   The proposed rule establishes minimum qualifications for licensure. Teacher education programs will need to revise their curriculum in these areas to ensure programmatic outcomes meet the content required for the new license.

c) Finally, just as licenses for foreign languages like German or Spanish have been kept separate under the new rule, the same should be said for areas such as band, choir, orchestra, etc.

   The proposed rule does not prohibit teachers from specializing depending on their interests. It establishes minimum qualifications for licensure.

B. Similarly, respondents also argued against collapsing licenses in the areas of social studies and math as well.

As noted earlier regarding music licenses, teacher education programs will need to address changes and beyond minimum requirements, teachers would still be allowed to specialize. It should be noted that a broad field social studies already exists as a license option.

C. Some individuals spoke to similar concerns about a "broad field" license for science, specifically in removing the environmental education portion required for educators with licenses in agriculture, early childhood, and middle childhood to early adolescent, science, and social studies. They requested that environmental education be kept as a requirement for licensure, in order for educators to be "environmentally literate" and be prepared to teach environmental education at all grade levels.

The Department is making no changes in this area as the requirement for environmental education was not eliminated. The reference was removed in the rule as it was duplicative of a statutory requirement.

D. Various respondents spoke to the licenses for interpreters, which included the following concerns:

a) Under s. PI 34.034, clarification is needed regarding the EIPA score with feedback from the State Superintendent's advisory committee on deaf and hard of hearing. In addition, clarification is needed on oral interpreting; it seems some interpreter preparatory programs don't include this, so clarification is needed. Clarification is also needed on manually-coded English and preparation, including some language and terminology. Concerns on prep for 150 hours 4-9 grade under the current rule, because many colleges prepare students for grades K-12 not 4-9.

The license for educational interpreters is revised due to public comment. The changes include the following:

- **i. The score setting for the EIPA has been changed to require a consultation from the Advisory Council on the Deaf and Hard of Hearing.**
- **ii. The license has been changed to allow the license holder to interpret for pupils who are deaf or hard of hearing as identified through Individuals with Disabilities Education Act or Section 504 of the Americans with Disabilities Act.**
- **iii. The rule now defines interpreter training program certificate as from an accredited 2 or 4 year college or university and clarifies required coursework.**
- **iv. The practicum is expanded to Prekindergarten through grade 12 while maintaining 150 hours.**
- **v. Licensure now addresses certification by the Department of Safety and Professional Services, RID, and BEI, along with others verified by the State Superintendent in consultation with the Deaf and Hard of Hearing Council.**
- **vi. Skill development is removed as it is included in EIPA assessment requirements.**
- **vii. CEUs and Credits are clarified as options for renewal requirements, including serving as a mentor to count as 2 semester credits or 3 CEUs.**
- **viii. Oral interpretation is removed.**

b) Under s. PI 34.053, terminology around hearing impaired is an outdated term, should be replaced with terminology that more adequately suits the range of abilities associated with deafhood. Additionally, s. PI 34.053 (2) (a) 3. states "language problems" and should be changed to "language acquisition."

The Department agrees that the term hearing impaired is outdated. The Department will be replacing references to hearing impairment with deaf and hard of hearing and language problems with language acquisition.

c) Professional development for educational interpreters needs to continue despite lifetime licenses; for deaf and hard of hearing teachers,

Lifetime licenses are only available under state statute to teachers, administrators, and pupil services staff. The Department agrees with the comment that educational interpreters need to remain current with their skills and did not propose a lifetime license in this area. However, to avoid confusion this license, and other related services licenses, are moved to clarify that they continue to be licenses that must be renewed.

d) American Sign Language Proficiency Interview (ASLPI) scores should be required- 2.5 to 3 as a minimum score for teachers to become deaf and hard of hearing teachers so they can really communicate with deaf children in their language.

The rule will be changed to reflect that the scores for sign language proficiency will now be recommended by the Deaf and Hard of Hearing Council for the State Superintendent to consider.

E. Some individuals spoke to the changes in rule regarding Tribal and First Nation-related cultural and language licenses, noting that while the authorization section under PI 34.058 First Nation language license lists each tribe separately, the

eligibility criteria does not designate each tribe's unique process for certifying its own language teachers, arguing that each tribe should retain its own authority and its own processes for certifying teachers of its tribal languages. For example, the Ho-Chunk Nation has established a Language & Culture Code, granting this authority to the Ho-Chunk Language & Culture Committee. The proposed administrative rule, as written, leaves this process open to interpretation to also include the "tribal language division, or by the designee of the local First Nation or American Indian parent advisory committee." However, certification of teachers for these unique and important content areas should be determined by the relevant tribal nations according to their own processes with consultation with their partner school districts. Therefore, the administrative rules should clearly reflect adherence to each tribe's unique processes for certifying their own language teachers.

The Department agrees with the comments and, as a result, is making the following changes:

a) The term First Nation will be changed to American Indian.
b) The History, Culture, and Tribal Sovereignty license will be changed to reflect a license specialization for a particular tribe.
c) Eligibility criteria for these licenses will be changed to clarify that the department will only recognize endorsements for licensure from an entity or entities authorized by the tribe.
d) The reference to the Ho-Chunk language will be changed to Hocąk.

F. One individual argued against add-on licenses in ESL and Bilingual-Bicultural education, due to the significant amount of training in second language acquisition, ESL strategies, academic language, differentiated instruction and assessment, and teaching literacy and writing in a language other than English, in addition to the qualifications they hold as grade level or subject area teachers, in order for the applicant to be well qualified in their license area and for ELLs to succeed.

This topic was not one that has been discussed at length by the public. As a result, the department is making no changes at this time, but will be considering making changes to this in a future rule revision to afford an opportunity to have an in depth discussion with the public.

G. Some respondents spoke to concerns about licenses for special education teachers, including the following:

a) The conversion of teachers with emergency special education licenses will be able to convert their license to a Tier I license without having to meet all the special education teacher training requirements.

Special education teachers are, under the existing PI 34, able to teach on an emergency license for a period not to exceed three years. The three year limitation is due to provisions in federal law. The proposed rule does not change the provisions under which a teacher could acquire a special education license in this way except to recategorize emergency licenses as a Tier 1 license. Tier 1 licenses are all licenses where a licensee has not met all requirements for a provisional license. No changes will be made to the proposal on this point as no policy changes are being proposed from current law and practice.

b) Respondents also took issue with the requirements for short term substitute teacher licenses and special education program licenses. They request that substitutes for special education program aides be required to have a bachelor's degree and have completed: 1) basic training of the IEP and required delivery of services; 2) ability to demonstrate knowledge of working with students with disabilities; 3) use of and implementation of positive behavior strategies and de-escalation strategies; and 4) delivery of modified or accommodated curriculum.

Wisconsin has never had a separate substitute teaching license specific to special education and this rule does not change that practice. While the Department understands the concerns expressed about the qualifications for teachers of special education students, federal law governs the application of a free and appropriate education for special education students.

Additionally, special education program aides are not teachers. Aides are meant to work under the supervision of teachers and there are no corollary requirements, such as those mentioned in this comment under federal law. As the proposed rule does not change current practice, there are no changes made to the proposed administrative rule.

H. Some respondents made recommendations around licenses for audiologists:

a) Language in PI 34.028 be modified to explicitly exclude speech and language/speech-language pathologists from Tier 1 pathway that provides speech and language services by bachelor-level individuals based on district need.
b) Advancing a proposal to create a single, universal license for speech-language pathologists and audiologists that would be transferable across work settings (in addition to recognizing DSPS licenses for DPI licensure).
c) That the Department seeks legislative changes to ensure that individuals who are DPI licensed but do not work in a school setting (e.g., CESAs, universities, therapy staffing agencies, etc) be considered eligible for a lifetime license.
d) Language to allow audiologists with a valid DSPS license to be eligible for DPI licensure under PI 34.068, reflecting the current minimum education requirement for audiologists (the Doctor of Audiology Au.D is the professional degree for audiologists).

As a result of the public comment, the department is making the following changes:

a) The reference to the advanced degree for audiology is being changed to Au.D.
b) Tier I licenses for teachers based on district need will exclude speech and language pathologists.

In regards to a universal license, the Department does not have the authority to require the Department of Safety and Professional Services to recognize the licensed issued by the Department of Public Instruction (DPI). DPI does, however, recognize in the rule the DSPS license so that those with that license can work in a school. As this was already codified in the rule, there are no changes to the proposed rule on this point.

The final point about lifetime licenses is outside the scope of this rule as lifetime licenses have to comply with the provisions of statute.

I. Some individuals submitted comment related to orientation and mobility (O&M) specialists and requested that this license be moved and treated in the same category as teachers of the visually impaired (moving the section from subch. VII to subch. VI). This is because, unlike other related student services providers like occupational therapists and physical therapists, many O&M specialists have been required to complete additional coursework that are completed by classroom teachers, and that many in this field actually receive MSEd degrees, which is an education degree and should be licensed with other educators. Finally, the majority of O&M specialists working in schools are licensed teachers of the visually impaired, and many skills and pedagogical knowledge from that license come into play in the role of an O&M specialist.

The Department agrees with the comment that orientation and mobility specialists should be grouped with other special education related services licenses. The Department is a making a number of changes to the grouping of special education related services licenses under the proposed rule. This license will be moved to a new Subchapter X relating to Additional Licenses with all other related services licenses as they are unique licenses distinct from, but related to, teaching special education students and students with 504 plans under the Americans with Disabilities Act..

J. Some individuals voiced concerns regarding school psychologists and requested that the rule be modified to indicate that a school psychology applicant must have university/college-based school psychology training before a Tier I, II, III, or IV license is granted. They cite recommendations by the American Psychological Association that stress that merely

taking an internship or acquiring experience in a practicum setting (which is provided in the currently proposed rule) is not considered adequate preparation for becoming a clinical, counseling, or school psychologist when prior training has not been in the relevant area.

The proposed rule does not change current practice in regards to licensure of school psychologists who have not completed all requirements for a provisional license. Emergency licenses are eliminated and instead found in Tier I, where all licenses rest for applicants who have not yet completed all requirements. As no policy is being changed, the Department is not making any additional changes in this regard.

Separately, the Department is making a change to a separate Tier I license in response to this comment. Tier I licenses based on district need will now require that the applicant will have completed the terminal degree required for the Tier II provisional license.

K. In the area of social workers, respondents stressed that the rule continue to require a masters in social work (MSW) as well as an institutional endorsement with require an internship in a school setting as key components for a school social worker license, including those hired through an alternative pathway program. For those hired under the license with stipulations/Tier I already working as a social worker under the supervision of a cooperating school social worker, the approved university program should coordinate with that individual and their school district to acquire needed experience, including courses and a portfolio. For any out-of-state social worker hired by school districts, who are already licensed in another state, respondents recommend that the license is only granted reciprocity if the individual has an MSW.

The Department is making a change in response to this comment. Tier I licenses based on district need will now require that the applicant will have completed the terminal degree required for the Tier II provisional license. Other changes requested by this comment are not being made as the current standard, and what is being reflected in the proposed rule, is higher than what is being requested in this comment.

L. Some individuals cited disagreement with the changes around the licenses for library media specialists, specifically in removing the master's degree requirement. They argue that the change is not fair to the current LMSs who have put in time and money to complete the degree, and call it woefully optimistic that lowering requirements for licensure in this area is not the best way to attract qualified individuals into the classrooms.

The removal of the master's degree requirement was recommended by the Professional Standards Council for Teachers and requested by school administrators due to the difficulty in filling positions. While the degree requirement was changed, the actual expectations for the license remain in regards to the proficiencies preparation programs are required to teach.

M. One individual requested consideration for relaxing the requirement that a school business administrator possess a master's degree. This is because the role of a school business administrator in a district is unique compared to principals, district administrators, and other administrative and pupil services positions. EPPs in this area generally structure school business as a modification of their leadership-focused M.Ed./M.S.Ed. programs, at the expense of coursework in accounting, human resources, management, and other skills required in the school business office. Additionally, many smaller districts employ bookkeepers or financial coordinators who serve as business managers in all but name. They possess associate's or bachelor's degrees in accounting or business but fulfill all the same duties for their districts as would a licensed, master's degree-holding school business administrator at significantly lower salaries. Relaxing current requirements would help alleviate this staffing shortage while also creating a realistic career path for individuals who would otherwise not be able to advance beyond support roles. Additionally, the language around attaining lifetime licenses for business administrators should be clarified, since it is not appropriate to measure a business administrators work experience in semesters (similar to teachers).

This comment suggests a change that would be a significant departure from current practice. Due to the magnitude of this change, and that it is not supported by those representing school business officials, the Department will not make this change to the proposed rule at this time. Regarding measurement of work experience counted toward the lifetime license, the comment is outside the scope of this rule since statutory provisions govern the acquisition of a lifetime license.

N. Regarding the administration categories, one respondent took issue with the provision allowing 6 semesters of successful experience as a school counselor, school psychologist, or school social worker. The respondent questioned whether school districts would be able to objectively measure successful experience as a counselor, psychologist, or social worker without proper indicators to define "success." They requested that the DPI consider a requirement for a candidate to demonstrate research-based practices and teacher performance indicators such as the edTPA or performance improvement indicators based on mentoring and/or coaching in an LEA before a candidate may receive a license.

This comment addresses an issue that is outside the scope of the rule as they are provisions in state statute so no changes will be made.

O. Concerns exist around the requirement that a teacher needs to be employed by a school district in order to be eligible to maintain a lifetime license. This, however, does not include teachers employed by CESAs that work outside school districts to serve multiple school districts. Additionally, teachers that work in private schools may only be able to receive and re-apply for a provisional license every year until those teachers taught in a public school. These respondents requested that the Department implement rules that are inclusive of CESA or private school teaching experience and tenure, and that such experience counts as valid toward earning and maintaining lifetime licenses.

This comment addresses a change that is outside the scope of this rule. State statutory provisions were made to address this point.

a) Another individual requested consideration for volunteer work in a school district to count toward maintaining a lifetime license, in the event their current license converts to a lifetime license and the applicant has recently retired.

   This comment is outside the scope of this rule. Due to recent statutory changes the Department will address this issue in future rulemaking.

b) One individual also wanted to count experience for teachers working in charter schools, online PK-12 schools, work at DPI, an IHE/EPP, approved alternative certification program, or other public, private, or governmental organization providing services to PK-12 students or providing training/support for future PK-12 educators.

   This comment is outside the scope of this rule. Due to recent statutory changes the Department will address this issue in future rulemaking.

P. Concerns were raised regarding lifetime licenses, such that in the event that the teacher is not hired full-time by a Wisconsin school district and wishes to reinstate his/her license, the teacher would have to take six credit hours of graduate work and then apply for a three-year provisional license which is a step down from the professional license that was previously held for several years. They argue that stripping the qualifications of teachers who may decide to leave the profession for other temporary personal/professional pursuits (pursuing further education, teach in another state or country, take political or union appointments, child rearing, etc) who at any time my decide to return to public education is very short-sighted. Respondents request consideration for grandfathering the existing Professional licenses, either turning them into Lifetime licenses that are not subject to cancellation or leaving them under the existing system of earning six credits every five years to maintain a 5-year Professional, not 3-year Provisional, license.

This comment is outside the scope of this rule. Statutory provisions govern the acquisition of a life license that would not allow this change.

a) Additionally, respondents argue that lifetime licenses should not be issued without a requirement for ongoing professional development through accredited educational institutions. They argue that the regular background check is not enough as a condition to maintain the license and that the courses are needed in order for the teacher's skills to remain relevant in the classroom.

   This comment is outside the scope of this rule. Statutory provisions govern the acquisition of a life license that would not allow this change.

b) Some respondents requested clarity as it relates to the standards for lifetime licenses, namely, what is meant by the terms "semesters" and "successful completion" in the requirement that an individual successfully completes 6 semesters of teaching, administrating, or pupil services experience. For example:

   i. Section PI 34.074 (4) (a) refers to "6 semesters of successful, full-time classroom teaching"
   ii. Section PI 34.074 (4) (b) refers to "6 semesters of successful experience …"
   iii. Section PI 34.068 (2) (b) 2. refers to "… successfully employed by a school or school district as a school audiologist prior to July 1, 1994, on a full-time basis for 2 semesters, or the equivalent."
   iv. Section PI 34.029 (2) (b) refers to "at least one year of full-time teaching experience in the employing school district."
   v. Section PI 34.041 (2) (c) refers to "…as determined by the applicant engaging in full-time teaching or work as a principal for at least one year."
   vi. Section PI 34.043 (2) (d) refers to "…at least 3 years of successful teaching experience in the subject area and grade level of the preparation under subd. 1."
   vii. Section PI 34.044 (1) refers to "… at least 6 semesters of experience in the subject area or position of the tier II license."

   Due to recent changes to the underlying statutes since the release of this rule (as a result of amendments to 2017 Senate Bill 711, enactment pending at the time of the filing of this report), additional rule changes will be required to further define teaching, administrating, and pupil services experience. Therefore, the suggested changes will not be made at this time.

c) One respondent requested revisiting the proposed section of the rule that carries over previous mandates related to providing educators with collaboratively developed and delivered orientations and support seminars with a qualified mentor. To that end, the rule should be revised to allow greater flexibility and to permit school districts to better situate new educator supports in the context of their local PDP initiatives.

   The rule will be clarified to indicate that teachers new to the profession will receive orientation and a mentor for the first three years related to their educator effectiveness goals.

Q. One respondent noted that sections of the proposed rule define the primary licensing stages do not sufficiently and consistently incorporate the non-teaching license categories and that the Department should more consistently use broader concepts of "license areas" and "positions" in these sections and make clear distinctions when a provision applies only to certain license categories.

The Department agrees with the need to clarify teaching categories and has clarified the necessary related language.

R. One respondent requested that middle school licensed teachers be able to earn high school licenses via content area exams in order to avoid the excessive costs associated with the coursework that is required to complete a license to teach in high school.

The option to add math and English language arts high school licenses through a content test for middle school teachers already exists. As the ability to earn licenses through tests is a more expansive topic that merits additional discussion the department feels this should be a separate subject for future rulemaking.

S. Respondents spoke to concerns regarding the district-sponsored pathway for licensure, noting that:

a) The rule should allow the employing school district to partner with an educator preparation program to ensure the applicant attains proficiency in the content area. Regarding advancement, the license holder's employing school district submits a written request to the Department or to an educator preparation program for endorsement in the new subject area or grade level.

   The Department will be changing this license to ensure that the license holder, not the district is responsible for submitting the evidence demonstrating proficiency in the content area. Additionally, the proposed rule will be changed to clarify that the applicant may submit that evidence to either an Institution of Higher Education or the Department of Public Instruction for endorsement for licensure.

b) However, other respondents argue that renewal should be based on objective considerations submitted to DPI as in the past with graduate credits. Additionally, respondents requested that the LEA must show that a licensed educator or professional could not be identified for a position before the LEA sponsors an individual to be hired to teach based on experience.

   The Department is making changes to the proposed rule regarding submission of evidence.

   The district pathway license is only available for those who already possess a provisional (Tier II) teaching license and above under the proposed rule. Under current rules, those teachers would be able to teach on a license with stipulations with no pathway to full licensure in the area. The proposed rule remedies this by allowing the applicant to learn and demonstrate proficiencies in the content area while on assignment. This was recommended by school district stakeholders and was broadly supported through public comment based on the number of respondents who supported the rule as presented. As a result, the Department is not making a change in this area.

T. Regarding the assessments necessary for licensure, many respondents argue that the Department's rules sidestep the Foundations of Reading Test requirement in creating the Tier I license. While the test is still required in statute for traditional license applicants, the Tier I license appears to eliminate this requirement. Respondents request that the Department look at better ways to prepare all teachers to pass the test, including working with IHEs and educator preparation programs to integrate the test into the curriculum for all student teachers.

The proposed rule requires an applicant to pass the Foundations of Reading Test in order to receive a provisional license. The proposed rule does not change that statutory requirement.

U. Also regarding Tier I licenses, one respondent was concerned that the proposed rule would allow a person to teach their entire career with a Tier I license, bypassing all of the other requirements outlined in PI 34 for educator preparation. The respondent suggested that the durations of the Tier I licenses be consistent (e.g., three years) and the number of renewals be limited.

Special education Tier I teaching licenses are limited to three years due to federal law provisions under IDEA. Additional restrictions are not placed on the length of other Tier I licenses as this was requested by stakeholders. Further, there are a number of onramps to a provisional license that exist in the rule. Due to educator effectiveness provisions in state law, and school district teacher pay scales it was felt that there are significant disincentives to remaining on a Tier I license for an extended period of time. If this proves not to be the case, the Department will reevaluate this provision in future rulemaking.

V. One respondent expressed concern that s. PI 34.043 (2) (b) allows a person with an expired license to obtain a provisional license regardless of the length of time they have been away from the teaching profession, and recommended a time limit.

This is outside the scope of the proposed rule as the recommendation affects provisions detailed by state statute.

W. One respondent spoke in support of finding additional alternative pathways to licensure for non-traditional professionals and students in order to avoid hurdles created by the Praxis exam. The individual argued that the test is culturally biased and doesn't accurately assess if a person will be a good or efficient teacher.

The proposed rule codifies the ability of educator preparation programs' ability to set admission requirements so a PRAXIS test for entry is not required by the department. In order to exit a program, candidates must demonstrate proficiency. The proposed rule creates alternatives to the PRAXIS, including GPA or content portfolios, to demonstrate said proficiency. No additional changes are needed to address the comment.

X. Several respondents requested that all current license holders be grandfathered or given the option of expanding licensure in any or all forms as outlined in the proposed rule.

The proposed rule recognizes existing licenses by allowing current license holders to maintain those licenses. If a license holder wishes to transition to new licenses under the proposed rule, the rule contains ways to do so.

Y. One respondent requested that Montessori trained teachers from accredited Montessori teacher education programs be granted a license that allows them to teach in any Wisconsin public school.

The scope of this license, and affiliated learning objectives, are specific to a Montessori curriculum. Those with this license are not taught the content required of elementary, middle, or high school courses outside of this curriculum. No changes will be made.

Z. One respondent requested further clarity with respect to the early childhood license. The proposed s. PI 34.051 provides that the licenses under EC education authorizes an individual to provide special education services to children from birth to grade 3 (similar to the prior rule); however, under the "additional license areas" in the proposed s. PI 34.055 (2) (a), the EC grade level license could be issued to an individual who holds certain licenses provided the individual has at least 4 semesters of classroom teaching experience in PreK-Grade 2.

The Department agrees this would add clarity and will make the suggested change.

AA. One respondent recommended an appeals process to be implemented to make clear to all parties their rights and responsibilities under the new system of licensure including the ability for educators to return to an original or similar assignment.

This comment concerns teaching assignments that are employment decisions made by school districts and thus outside the scope of this rule.

AB. One concern was raised about the conversion of "developmental levels" under the current PI 34 to grade levels, which are being standardized into fixed levels under the proposed rule rather than allowing school districts to define developmental levels differently. It seems this removes flexibility and may cause unintended consequences.

This change was supported by the majority of respondents who supported the rule as written. The change from developmental levels to grade levels creates greater clarity around the grade levels for which teachers are licensed to teach. Flexibility still exists within the rule to address unique situations.

AC. Finally, one respondent suggested that educators and school district officials could benefit from greater guidance regarding the manner in which Department handles situations where a credential holder enters a period of employment during which their credential shows as having expired. In some situations, the Department may "back date" a credential or grant an extension so that the gap is cured, and in some situations the Department will not "back date" the credential or grant an extension.

Current practice, which will continue under the proposed rule, is to date all licenses effective July 1. The situation the comment envisions is already addressed through current practice. No rule change is necessary.

2. A number of respondents spoke to various matters around program approval, which included the following:

A. One respondent expressed opposition to the certification of educator-prep programs under the rule. The individual argued that the path to certification is a low bar and seems specifically aimed to enable certain online programs, which devalues the social and interpersonal requirements of teaching and empowers the use of "canned curriculum."

This comment is specific to the online only program culminating in a test, which, if passed, results in licensure. This program was created in 2017 Act 59 and is statutory and cannot be changed via rule.

B. A couple respondents argued that the new licensure system would have negative consequences for the teaching profession, noting that allowing ABCTE-prepared applicants and other alt route applicants to obtain licensure will contribute to a two-tiered teacher preparation system in Wisconsin. For example, they project that some school districts facing extreme shortages may be left selecting from candidates who are ill-prepared for a very complex profession, while suburban districts will be selecting teacher candidates who were well-trained in a 4 year college program. Such a two-tiered system, they note, will only exacerbate the achievement gap in the state.

This comment is specific to the online only program culminating in a test, which, if passed, results in licensure. This program was created in 2017 Act 59 and is statutory and cannot be changed via rule.

C. One respondent noted that the draft rule's conceptual framework requiring students of educator preparation programs to demonstrate knowledge and understanding of equity and discrimination (s. PI 34.022 (3)) omits, and should be revised to include, the psychological and social implications of discrimination on the basis of disability (s. PI 34.022 (3) (d)) and the forces of discrimination, especially discrimination on the basis of disability, on administrators, teachers, pupils, assessment, curriculum, and instruction in schools (s. PI 34.022 (3) (e)).

This portion of the rule is restating the statutory requirements for topics that must be covered by teacher preparation programs. The topics suggested by the respondent are not required in statute and would necessitate a larger conversation. As a result, the Department is not making this change at this time.

D. Some respondents requested the following changes regarding the observation and evaluation of professional staff:

a) Relating to s. PI 34.023 (h) 1., the sentence stating that "at least one observation shall be in-person" should be eliminated. In accepting that real-time virtual is an acceptable alternative for 3 of the observations, requiring physical travel to the site is not justified for one observation. For example, in the area of certification for school librarians, there are currently only 3 SCDs (UWs Milwaukee, Madison and Whitewater) that grant the school library license. All are in southeast Wisconsin, yet the responsibility exists to serve all candidates and districts throughout the state. Real-time technology and adequate site supervision meet requirements for clinical evaluation.

   The Department already acknowledges the value of a virtual observation for one of the required observations. However, a virtual observation does not always capture the full detail of the classroom and the environment, which are important to a determination of effective teaching practice. In response to the issue of distance, it should be noted that the Department supports institutions of higher education in their decisions to contract out this observation to a qualified individual located in the area. As a result, the Department is not making a change in this area.

b) There are also concerns with PI 34.073, because as written, in order to supervise and evaluate professional staff, an individual must hold not only the administrator license but also one of the teaching licenses established in PI 34.048 to 34.050. Currently, PI 34 permits the license category of "administrator" to evaluate staff and does not require an individual to simultaneously maintain a teacher license.

   The respondent noted a problem that arose as the result of a numbering error. This will be fixed to remove the reference with its affiliated requirements.

E. Several individuals argued that minors taken in college should be considered acceptable for licensure. If universities are encouraged/required to keep our programs to around 120 credits, there is not much room for double majors. Double majors that result in dual licensure would take substantially longer (5-6 years) and would cost the students quite a bit more money. Respondents argue that universities want students to graduate on time and be as marketable as possible, which is achieved through minors/add-on certifications. The removal of minors as sufficient for secondary (4-12) licenses will likely result in fewer double-licensed candidates.

The Department has never given licenses based on a minor. The Department approves educator preparation programs based on a set of outcomes, not credits. When an applicant graduates from an approved program they have had to demonstrate the expected proficiencies in order to be endorsed for licensure. The Department will not change the rule to award licenses based on minors. It should be noted, however, that there are a number of options contained in the proposed rule for an educator to demonstrate competencies or add-on licenses based on content knowledge.

F. One respondent advocated for more flexibility for educator preparation programs to determine the length of the student teaching semester as a result of challenges in how the EPP has had to meet the needs of our students, including: 1) Supervisors are often faculty members, whose contracted work dates typically do not align with students' school semester calendars, meaning that student teachers frequently have 3-4 weeks without their assigned university supervisors present for support; 2) Students who complete semesters earlier than the practicum end date are often required to wait up to six weeks to have their degrees conferred and license endorsements uploaded, resulting in at least some graduates missing out on job offers; 3) University practicum dates are set for a more traditional semester start, leaving the early start calendars to fall outside this practicum schedule, which is an issue with our Registrar's Office. There are several start and end dates, so the practicum would need to span almost six months in order to accommodate all different placement calendars.

The proposed revision brought forward by the respondent is outside the scope of the rule as the definition of a semester of teaching is delineated in statute.

G. One respondent requested a change to the rule such that the parameters of the length of student teaching changed from "full school days for a full semester of the cooperating school" to a duration of weeks from 12-18 weeks.

The proposed revision brought forward by the respondent is outside the scope of the rule as the definition of a semester of teaching is delineated in statute.

F. Some clarifications were requested regarding program approval, including:

a) Consistency is needed between the use of the terms program and major. For example, the new grade 4-12 licenses will require majors; while K-9, Birth-3, and special education require completion of programs.

   The Department agrees with the lack of clarity that results from the interchangeable use of major and program. The Department will remove the use of the terms major and program where appropriate and replace with proficiency throughout the rule.

b) Processes should be in place for new lifetime licensees to remain current in their field.

   Statutory provisions are clear in that no conditions around professional development can be added as a condition of the license. Separately, however, state statutes require an educator effectiveness process that does focus on continued educator development.

c) Standards should be used to ensure continuous review for alternative pathways.

   It is unclear to which alternative pathways are being discussed here. If it is one of the pathways detailed in statute it is outside of the scope of the rule as rules can not alter statutory provisions. If it is one of the alternative programs approved under the scope of PI 34, the Department has long had programmatic standards that govern the approval process for these programs to ensure quality.

d) A definition of teacher education program is needed as it is no longer defined in the rule.

   This is being retitled to educator preparation program.

e) Who will define (and how) “equivalent experience” and “equivalent in the principal discipline of the program”?

   The rule will be clarified to state that these will be as determined by the State Superintendent.

f) Definition of semester needed.

   The definition of semester is in statute. The Department will add a cross-reference to this definition to add clarity.

G. Requests for specific modifications were requested regarding s. PI 34.014 related to faculty. In particular:

a) Section PI 34.014 (2) (b) suggests that faculty must have expertise in all developmental levels rather than developmental levels appropriate to their assignment. This is an unrealistic requirement and this section of the rule should be revised to include “appropriate to their assignment.”

   The Department agrees with the effect of the language and will make the corresponding change.

b) Section PI 34.014 (3) neglects essential components of faculty contributions to workload including advising, scholarship, and service. These responsibilities should be reinstated in the proposed rule.

The Department agrees with the need to acknowledge this work as part of the faculty workload and will make the corresponding change.

c) Section PI 34.014 (5) does not require that faculty be full-time. Institutions have long recognized that full-time faculty are more invested and better prepared to deliver the necessary curricula, and provide stability and continuity necessary for robust teacher education programs. The requirement that the SCD has sufficient numbers of full-time faculty should be reinstated.

This was a drafting error and the Department will make the change and reinstate this language.

H. One respondent noted concerns around in-state IHEs that will continue to be assessed via the Continuous Review Process (CRP). In this process, programs use data from their programs to make decision regarding program improvement. All programs should be held to high standards, but it is not clear whether all pathways will be held to the same standards.

This comment appears to be a reference to statutorily defined pathways to licensure that require the department to issue licenses based on completing requirements that are not part of a Department approved educator preparation program. As those pathways are in statute, it is outside the scope of the rule to impose standards on those pathways.

I. One respondent requested that the required background check prior to admission into a teacher education program not be a mandatory admissions criteria in order to eliminate redundancy and costliness, due to the current practice that school district partners often require their own background check for each field placement of preservice teachers.

The Department has a responsibility to ensure the safety of students. Given that a significant amount of time passes between admission into the program and working with students, the Department will not remove this background check requirement. The Department will, however, move this requirement into the clinical program requirements to clarify the responsibilities of the state and the educator preparation program.

3. Finally, a number of respondents who were opposed to the rule spoke to the changes surrounding educator misconduct and license revocation. These concerns dealt primarily with the ambiguity around the provisions that allow the Department to suspend a teacher for showing favoritism and having discussions with pupils for non-educational purposes, which do not provide any criteria that measure such violations and could subsequently be misinterpreted. Concerns were additionally raised regarding the provision of the rule which allows a teacher to report another teacher in order to receive a lesser penalty on his or her license, which will have a negative impact on morale and trust among educators. Finally, respondents thought that the penalties under the proposed rule, specifically suspensions that last three to five years without any clear right to due process, were too restrictive and may have the effect of making the teacher unemployable. As such, lesser offenses are best dealt with at the school district level rather than giving the Department broader authority to interpret misconduct and administer penalties.

As a result of the significant public feedback surrounding educator misconduct, there is clear disagreement around this section of the rule and a lack of consensus. As a result, the Department has decided to remove all new policy provisions in this section. The Department will instead maintain existing rule provisions on educator misconduct, making changes only to update for style, format, and clarity. The Department will consider future rule revisions in this area only if warranted and through a separate rulemaking process.

Changes to the analysis or the fiscal estimate:

- No changes were made.

Responses to Clearinghouse Report:

The Department reviewed all comments received in the Legislative Council Clearinghouse Report and made corresponding changes. Suggested changes omitted by the Department are as follows:

2. Form, Style and Placement in Administrative Code:

e. A definition for "license" was established under s. PI 34.001 (12) to state that licenses include any license, permit, or certificate issued by the State Superintendent under ch. 118, Stats. As such, the proposed rule creates no distinction between "permits" or "licenses."

k. The names for the deaf and hard of hearing licenses and the blind and visual impairment licenses were terms agreed upon and used in consultation with stakeholder groups in developing the proposed rule. The Clearinghouse Report does not provide an explanation for why the license names should be changed. As such, the Department will be retaining the original proposed language in the final rule.

5. Clarity, Grammar, Punctuation and Plainness:

h. Statutes specify the minimum standards for educator preparation programs in s. 118.19, Stats. As such, it is not necessary to redefine these requirements in the rule.

qqq. Intentionally omitted.

rrr. The proposed rule was intended to expand the urban educator license to include urban school districts in place of the original first-class city limitation.

Changes deemed necessary by the Department to improve implementation of the rule:

Subchapter I

- PI 34.001 Definitions: Added definitions for "full-time" and "license."

Subchapter III

- PI 34.011 Experimental or innovative programs: Added statement that, after initial approval, these programs become part of the annual continuing review process.

Subchapter IV

- PI 34.012 Definitions: Added definition for "entity."
- PI 34.022 Statutory requirements: Added early childhood and elementary & middle school licenses to environmental education requirement. Added reference to mandatory reporting requirements in s. 48.981, Stats.

Subchapter V

- PI 34.025 Definitions: Removed definition for “institutional endorsement” because it duplicated definition in 34.001.
- PI 34.026 General provisions: Changed title to “General provisions” from “License effective date.” Added ability to issue licenses with a January 1 start date similar to current rule. Added explanations of the tiers.
- PI 34.029 District-sponsored license: Removed Tier I licenses from eligibility. Added statement saying that districts can partner with preparation programs. Changed from district requesting full licensure to teacher submitting evidence to either a preparation program or DPI for endorsement.
- PI 34.031 Charter school license: Added administrator license to conform with s. 115.28 (7) (gm), Stats., and also terms of validity for charter licenses (i.e., 3 years and 5 years).
- PI 34.035 One-year administrator license: Added requirements that applicant already hold a teacher or pupil services license and that if applying for a superintendent license must already hold a master’s degree.
- PI 34.040 (2) (d) Tier II provisional educator license: Revised language to better align with current practice.
- PI 34.040 (5) Tier II provisional educator license – District requirements: Combined orientation and support into one requirement. Removed “seminars.” Require that mentors successfully complete mentor training.
- PI 34.042 Tier IV master educator license: Added clarification that the Wisconsin master educator assessment process (WMEAP) is for licenses for which there is no national board certification.

Subchapter VI

- PI 34.046 Middle & high school license: Removed lists of acceptable major for science and social studies. They will now just require an approved program.
- PI 34.057 PK-12 licenses: Added back Dance and Theater. Consolidated all languages into World Language
- PI 34.052 Additional license areas: Expanded acceptable experience for adding early childhood license from PK-2 to PK-3. Made language reflect current practice of adding subject of specific test (e.g., Biology, Economics) rather than new “broad field” subjects. Added math. Added ability for elementary & middle school teachers to add a world language or health license based on passing a content test.

Subchapter VII

- Changed the location of several licenses from this subchapter (formerly s. PI 34.067 – 072) to a new Subchapter X – Related services and other licenses.

Subchapter VIII

- PI 34.065 General requirements: Removed license based on reciprocity (s. PI 34.038) from sub. (3).

Subchapter IX

- PI 34.073 Applicability: Clarified language to reflect current practice that supplementary licenses may only be issued to individuals who hold a tier II, III, or IV license.

Subchapter X

- Reinstated s. PI 34.095 relating to the substitute license for educational interpreters.
- Created s. PI 34.096 relating to JROTC instructors to reflect statute and current emergency rule.

Subchapter XII

- PI 34.110 License and preparation program continuation: Created a statement that life licenses issued prior to July 1, 1983, would be treated in the same way as a tier III license. Clarified an end date of August 31, 2023, for continuation of approved preparation programs.
- PI 34.111 Obsolete licenses: Reinstated non-renewable library media specialist.