

**Report From Agency**  
**FINAL REPORT**  
**CLEARINGHOUSE RULE 20-001**  
**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.

The objective of the proposed rule is to provide flexibility in the assessment of pedagogical knowledge as a condition for completion of an educator preparation program under s. PI 34.021.

The hearing notice was published in the January 13, 2020, edition of the Wisconsin Administrative Register. A public hearing was held on February 6, 2020.

*The following persons testified at the February 6, 2020 hearing:*

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Mike Flanagan	EduCATE - Wisconsin	X		

*The following persons submitted written testimony:*

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Abbey Roy	Representing Self	X		
Abrielle Hibbard	Representing Self	X		
Al Betry	Excellence In Teaching Program	X		
Alex Hintz	Representing Self	X		
Alexa Ratkowski	Representing Self	X		
Alyssa Klemme	Representing Self	X		
Alyssa Pionke	Representing Self	X		
Alyssa Sabel	Representing Self	X		
Amy Toson	Representing Self	X		
Andrea Bakkala	Representing Self		X	
Andrea Ruppard	Representing Self	X		
Ann Halbach	Representing Self	X		
Anne Hlas	Representing Self	X		
Ashley Emmer	Representing Self	X		
Barb Bauer	Representing Self		X	
Benjamin Lernerz	Representing Self	X		

<b>NAME</b>	<b>ORGANIZATION</b>	<b>IN FAVOR OR GENERALLY IN FAVOR</b>	<b>OPPOSED OR GENERALLY OPPOSED</b>	<b>OTHER</b>
Bree Lamers	Representing Self	X		
Brett Dekan	Representing Self	X		
Brianna Drake-Burmania	Representing Self	X		
Brianna Sabel	Representing Self	X		
Bridget Christenson	Representing Self	X		
Brittany Hoover	Representing Self	X		
Carmen Manning	Representing Self	X		
Carol Koroghlanian	Representing Self	X		
Carol Hines	Representing Self	X		
Cassandra Spigarelli	Representing Self	X		
Catherine Peterson	Representing Self	X		
Cheryl Adams	CESA 9	X		
Cheyenne Grunow	Representing Self	X		
Chloe Malmgren	Representing Self	X		
Chris Hlas	Representing Self	X		
Christy Miller	Representing Self	X		
Clavon Byrd	Representing Self	X		
Cortney Mullen	Representing Self	X		
Craig Berridge	Representing Self	X		
Cynthia Kuhrasch	UW-Madison Physical Education Teacher Education Department		X	
Dana Ryan	Representing Self	X		
Danny Miller	Representing Self	X		
Dave Schaack	Representing Self	X		
David Gordon	Representing Self		X	
David Schaack	Representing Self	X		
Debbie Stanislawski	UW-Stout		X	
Debra Dosemagen	Representing Self	X		
Debra Faase	Representing Self		X	
DeeAnn Huinker	UW-Milwaukee	X		
Drew Kules	Representing Self	X		
Drew Silver Joseph	Representing Self	X		
Elizabeth Alderton	Representing Self	X		
Elsa Boe	Representing Self		X	
Emily Wight	Representing Self	X		
Emily Williams	Representing Self	X		
Emma Grahn	Representing Self	X		
Eric Torres	Representing Self		X	
FH H *	Representing Self			X
Gabriela Oliveras- Bonaparte	Representing Self	X		
Gage Kamp	Representing Self		X	
Greg Bartley	Representing Self	X		
Gregory Cramer	UW-Parkside	X		
G H *	Representing Self			X

<b>NAME</b>	<b>ORGANIZATION</b>	<b>IN FAVOR OR GENERALLY IN FAVOR</b>	<b>OPPOSED OR GENERALLY OPPOSED</b>	<b>OTHER</b>
Hanna Gibbons	Representing Self	X		
Hannah Metry	Representing Self	X		
Hannah Schneider	Representing Self	X		
Hope Longwell-Grice	Representing Self	X		
Isabelle Peterson	Representing Self	X		
Ivy Hobart	Representing Self	X		
J. Erik Hendrickson	UWEC Physics & Astronomy Department		X	
Jacob Zeitler	Representing Self		X	
Jamaica Festge	Representing Self	X		
James Hartwick	Representing Self	X		
Jamie Keller	Representing Self	X		
Janelle Rucker	Representing Self	X		
Jason Schneider	Representing Self	X		
Jay Schultz	Representing Self	X		
Jean Rigden	Ripon College	X		
Jennifer Murphy	Representing Self	X		
Jennifer Schoepke	Representing Self	X		
Jeremy Stoddard	UW-Madison	X		
Jerry Worley	Representing Self	X		
Jessica Hartmann	Representing Self	X		
Jessica McQueston	Representing Self	X		
Jesslyn Hollar	Representing Self	X		
Jill Klefstad	Representing Self		X	
Jill Prushiek	Representing Self	X		
Joe Becker	Milwaukee Teacher Education Center	X		
John Yang	Representing Self	X		
Johnathan Bovee	Representing Self	X		
Jonathon Jimenez	Representing Self	X		
Jordyn Thaves	Representing Self		X	
Joshua Nesja	Representing Self	X		
Julie Luecke	Representing Self	X		
Kaitlin Hart	Representing Self	X		
Kaitlyn Stein	UW-Eau Claire		X	
Karen Evans	Marquette University	X		
Karin Sconzert	Carthage College Education Department	X		
Karlie Hanke	Representing Self		X	
Karrie Griese	UW-Oshkosh	X		
Kassi Hein	Representing Self	X		
Kate Vieira	Representing Self	X		
Katherine Lane	UW-Eau Claire	X		
Kathryn Fontanetta	Representing Self		X	
Katie McCabe	UW-Madison	X		

<b>NAME</b>	<b>ORGANIZATION</b>	<b>IN FAVOR OR GENERALLY IN FAVOR</b>	<b>OPPOSED OR GENERALLY OPPOSED</b>	<b>OTHER</b>
Kaycee Rogers	Representing Self	X		
Kelly Hayek	Representing Self	X		
Kelly Olsen *	Representing Self			X
Kerry Kretchmar	Representing Self	X		
Kevin Mason	Representing Self		X	
Kim Hofkamp	Representing Self		X	
Kim Schneider	Marian University	X		
Kimber Wilkerson	UW-Madison Teacher Education Center	X		
Kimberly Cosier	UW-Milwaukee	X		
Kimberly Martinez	Representing Self	X		
Kimberly Oamek	Representing Self	X		
Kimiko Ott	Marian University	X		
Kirsten Lathrop	Representing Self	X		
Kristi Moriarity	Representing Self	X		
Kristie Halverson	Representing Self	X		
Kyle Harrison	Representing Self	X		
Kyle Whipple	Representing Self	X		
Lana Collet-Klingenberg	Representing Self	X		
Laura Dunbar	Representing Self	X		
Laura Owens	UW-Milwaukee	X		
Leah Laey	Representing Self	X		
Leah Anderson	Representing Self	X		
Lee Rasar	Representing Self	X		
Leia Kufahl	Representing Self		X	
Linda Haling	Representing Self	X		
Linda Hoover	Representing Self	X		
Linda Myers	Representing Self	X		
Lindsay Schneider	Representing Self	X		
Lisa Mellecker	Representing Self	X		
Lisa Plichta	Representing Self	X		
Liz Rex	UW-Milwaukee	X		
Logan Peissig	Representing Self	X		
Lori Manion	Representing Self	X		
Mackenzie Palmer	Representing Self	X		
Madalyn Tomaz	Representing Self	X		
Madeline Russell	Representing Self	X		
Madison Warren	Representing Self	X		
Maggie McLain	Representing Self	X		
Malee Lor	Representing Self	X		
Marcie Wycoff-Horn	Representing Self		X	
Mary Hoefflerle	Representing Self	X		
Mary Lofy Blahnik	School District of Sheboygan Falls	X		
Mary Neubauer	Representing Self	X		
MaryBeth Petesch	Representing Self	X		

<b>NAME</b>	<b>ORGANIZATION</b>	<b>IN FAVOR OR GENERALLY IN FAVOR</b>	<b>OPPOSED OR GENERALLY OPPOSED</b>	<b>OTHER</b>
Matt Wedekind	Representing Self	X		
Matthew Collins	Representing Self	X		
Max Nowinsky	Representing Self	X		
Maxine McKinney de Royston	Representing Self	X		
McKenna Murphy	Representing Self	X		
Melissa Troudt	Representing Self	X		
Michael Beeth	Representing Self		X	
Mikayla Sullivan	Representing Self	X		
Miranda Walter	Representing Self	X		
Morgan Grasamkee	Representing Self	X		
Morgan Meacham	Representing Self	X		
Morgan Menning	Representing Self	X		
Morgan Schyvinck	Representing Self	X		
Myrna Hoover	Representing Self	X		
Nancy Jaeger	Residency In Teacher Education (RITE) Program	X		
Omobolade Delano-Oriaran	Representing Self		X	
Patricia Becker	Representing Self			X
Payton Kardys	Representing Self	X		
Peggy James	Representing Self	X		
Ray Hill *	Representing Self			X
Randy Hoover	Representing Self	X		
Richard Lind	Lind Educational Consulting LLC	X		
Robert Lazzell	Representing Self	X		
Robert VanSciver	Representing Self	X		
Robert Williams	Lawrence University	X		
Ryan Burojer *	Representing Self			X
Ryan Buroker *	Representing Self			X
Ryan Hill *	Representing Self			X
Ryan Hoover *	Representing Self	X		
Ryann Burroker *	Representing Self			X
Sam Evans	Representing Self	X		
Sam Plucker	Representing Self	X		
Samantha Baruah	Representing Self	X		
Sara Allaire	Representing Self		X	
Sara Cook	Representing Self	X		
Sara Cook	Viterbo University	X		
Sarah Huebner	Representing Self	X		
Sarah Mayer	Representing Self	X		
Scott Ashmann	Representing Self	X		
Shannon Huot	Representing Self	X		
Shannon Goltz	Representing Self	X		
Shannon Prince	UW-Parkside	X		
Sierra Reiman	Representing Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Stacey Jackson	Representing Self	X		
Stewart Purkey	Representing Self	X		
Susan Hersh	UW-Milwaukee School of Information Studies-school librarianship certification program	X		
T. Dobbs	Representing Self			X
Tara Putnam	Representing Self	X		
Taylor Heyrman	Representing Self	X		
Teona King	Representing Self	X		
Terry Burant	Representing Self	X		
Terry Schindler	Representing Self	X		
Tessa Neigum	Representing Self	X		
Thomas Taeger	Representing Self	X		
Timmylyn Schroeder	Representing Self	X		
Todd Hoover	Representing Self	X		
Trenton LaCombe	Representing Self		X	
Tristan Wohlrabe-Fritsch	Representing Self	X		
Tulio Rondon	Representing Self	X		
Tyler Olson	Representing Self	X		
Vici Hoffmann	UW-Oshkosh	X		
Virginia Waddick	Representing Self	X		
Wade Tillett	UW-Whitewater	X		
Wendy Kropid	Representing Self	X		
Wes Lebakken	Representing Self		X	
Yazmin Alvarez	Representing Self	X		

\* = Comments were not germane to the substantive content of the proposed rule.

INDIVIDUAL RESPONDENTS	ORGANIZATIONS REPRESENTED	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
212	23	176 (83.0%)	25 (11.8%)	11 (5.2%)

**Summary of public comments relative to the rule and the agency's response to those comments:**

- Multiple respondents in favor of the proposed rule argued that the intent behind requiring an educator performance assessment (edTPA) made sense until it was realized that the rule inadvertently hinders the student teaching experience for several reasons. For example:
  - Under the current performance assessment required by the Department, participants in educator preparation programs are required to pay \$300 to have the assessment evaluated. Because the assessment is provided by an external entity, student teachers often have to retake the edTPA with little or no feedback as to areas of the assessment that the student teacher failed. However, if a teacher candidate needs to retake parts or all of the edTPA, the candidate will need to pay an additional \$100 to \$300. As such, the assessment requirement has become an undue financial burden on many of those candidates who already experience financial difficulties due to their position as a student teacher.

- Some respondents report a level of testing bias within the edTPA because it does not account for circumstances such as bilingual teaching candidates seeking to obtain licensure and gives advantages to certain types of majors of students that take the edTPA. This has become a barrier for student teachers and is counterproductive to the state's goals of attracting a larger pool of qualified and more diverse candidates into the teaching profession.
- Due to its standardized nature, the edTPA has become very "high stakes" regardless of efforts by educator preparation programs to align their courses to the assessment. Respondents often attest to the extreme difficulties, stress, and anxiety that is experienced when preparing for the edTPA.
- Not only is obtaining a passing score on the edTPA difficult, but so is the ability of faculty to prepare student teachers for the edTPA. For example, there is little transparency about what is required to be a trained scorer of the edTPA and it has been stated to be unreliable and inconsistent with educator preparation priorities. Requiring a standardized assessment of pedagogy in an assessment like the edTPA takes discretion away from educator preparation programs to endorse candidates for licensure and gives control to external entities that administer and distribute the assessment.
- Because of the amount of time required of student teachers to meet assessment deadlines, it lessens the amount of time student teachers are able to learn in the field and complete their practicum experience. Respondents report that many student teachers often have to balance classroom demands, including prepare lessons and provide instruction, simultaneously with test preparation that is generally not associated with the required learning to become a teacher.
- Finally, there is no evidence that the current edTPA has improved their quality of teaching, nor does it provide insight to students' strengths and areas for growth that other assessments already provide, such as grades in methods courses or exit portfolios.

While assessing a student teacher's pedagogical knowledge is important in preparing students for the profession, it was argued that educator preparation programs are best suited to determine the appropriate means of assessing pedagogy. For example, assigning a portfolio of work or implementing a system of continuous feedback and coaching could serve reasonably well as tools for an educator preparation program to adopt in measuring a student's competency in pedagogy. It is possible that standards for assessing pedagogy can remain high without the Department necessarily requiring a passing score on a standardized assessment.

**Agency Response:** The Department agrees with the above comments citing the need for the proposed rule. No changes are necessary.

- The respondents against the rule change argued in favor of maintaining the edTPA for the following reasons:
  - Respondents argue that the edTPA is an adequate performance-based assessment because it is aligned to current expectations around educator effectiveness and provides a common measure to ensure candidates' readiness to teach.
  - The considerable time and energy that has been invested by educator preparation programs into implementing the edTPA has been valuable, and as such, modifying the requirements around assessing pedagogical knowledge seems counterproductive when teacher shortages are occurring.
  - Respondents believe that standardized measure for educator preparation like the edTPA has brought integrity to the entire educator preparation process. If the edTPA is removed in the educator preparation process, bias could skew the process if preparation programs only use internally-designed measures to assess a candidate's readiness for licensure. As such, finding or designing an alternative to the edTPA could prove difficult for educator preparation programs.
  - As an alternative to the proposed rule, some respondents have argued Wisconsin could adopt rules similar to Minnesota, which requires that student teachers take the edTPA but does not require a passing score to obtain licensure. They note it may eliminate stress for student teachers in preparing for the assessment.

**Agency Response:** The edTPA is an option that educator preparation programs can continue to offer or require. The Department, in its proposed rule, is moving to allow flexibility in the assessment of pedagogical knowledge.

***Changes made as a result of oral or written testimony:***

- No changes were made.

***Changes to the analysis or the fiscal estimate:***

- Made minor changes to the plain language analysis and fiscal estimate to reflect comments received in the Legislative Council report, as well as address typographical errors that were identified.
- Corrected the description and administrative code reference to comparable rules in adjacent states as applied to Minnesota.

***Responses to Clearinghouse Report:***

- The changes were accepted.