

ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected	2. Date
3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) PI 34, Educator licenses	
4. Subject Revisions to licensing of pupil services professionals	
5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S	6. Chapter 20, Stats. Appropriations Affected
7. Fiscal Effect of Implementing the Rule <input checked="" type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input type="checkbox"/> Could Absorb Within Agency's Budget	
8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses (if checked, complete Attachment A)	
9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137 (3) (b) 1., Stats. \$0	
10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137 (3) (b) 2., Stats.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11. Policy Problem Addressed by the Rule The proposed rule amends chapter PI 34 of the Wisconsin Administrative Code with respect to clarifying and creating flexibility around licensing rules for pupil services professionals, which include school nurses, school psychologists, and school social workers.	
12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments The department held a preliminary public hearing and comment period on the scope statement for the proposed rule. The comments received were considered in the development of this economic impact analysis and for the proposed rule. Additionally, during the development of this rule, education stakeholder groups were contacted for feedback on the rule, such as the Wisconsin School Social Workers Association, the Wisconsin School Counselor Association, and representatives from the preparation programs at institutions of higher education in the state which prepare pupil services professionals.	
13. Identify the Local Governmental Units that Participated in the Development of this EIA None.	
14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) Local: The proposed rule clarifies and creates flexibility around licensing rules for school nurses, school psychologists, and school social workers. The effect of the proposed rule will ensure that high quality is being maintained providing school districts that are facing shortages of pupil services professionals with the flexibility to address their staffing needs. The proposed changes may result in less time and resources directed to pupil services staff recruitment. It is not possible to predict how many applicants would take advantage of the flexibilities offered in this proposed rule as these options depend on individual circumstances. Therefore, the economic impact of this rule is indeterminate. State: None.	
15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule	

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The proposed rule clarifies and creates flexibility around licensing rules for school nurses, school psychologists, and school social workers. Without a proposed rule, the department would be required to implement PI 34 as the rules currently exist and applicants would be required to obtain licensure as a pupil service professional through existing pathways.

16. Long-Range Implications of Implementing the Rule

The proposed rule clarifies and creates flexibility around licensing rules for school nurses, school psychologists, and school social workers. The effect of the proposed rule will ensure that high quality is being maintained while providing school districts that are facing shortages of pupil services professionals with the flexibility to address their staffing needs.

17. Compare With Approaches Being Used by Federal Government

A summary of comparable federal regulations with regard to the license types affected by this rule is as follows:

School Nurse: There are no federal regulations regarding the competency of nurses working in schools. However, the National Board for Certification of School Nurses (NBCSN) is a national credentialing center that sets the professional standard for school nursing along with the National Association of School Nurses (NASN). Both organizations set minimal preparation for a school nurse as a bachelor's degree in nursing.

School Psychologist: There are no federal regulations regarding the competency of school psychologists. However, the National Association of School Psychologists and the American Psychological Association are national credentialing entities that have set standards for professional practice.

School Social Worker: There are no federal regulations regarding the licensure of school social workers. However, the National Association of School Social Workers (NASW) recommends minimum professional standards for the competency of school social workers. NASW recommends a master's degree in social work (MSW) as the entry-level qualification for school social workers. They also recommend local education agencies ensure school social workers have an MSW degree from a program accredited by the Council on Social Work Education. However, should the local education agency employ school social workers whose highest degree is a bachelor's degree in social work (BSW), NASW recommends an MSW-level social worker should provide supervision for the BSW-level social worker.

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

Illinois: Illinois rules regarding the license types affected by this rule are as follows:

- **School Nurse:** School nurse is a protected title and Department of Education has a Professional Educator License available for school nurses. The school nurse license is available but not required. Licensure requires graduate level specialty education and an internship. Illinois designates its licensed school nurses by "PEL-CSN." PEL-CSN licensure is required to participate in IEPs.
 - **School Psychologist:** In order to become licensed as a school psychologist, applicants must complete either of the following requirements: 1) obtain a master's degree or higher in psychology or educational psychology with a specialization in school psychology from a regionally accredited institution, 250 hours of practicum in a school setting or child study center, and a 1200 contact hour internship lasting a full school year under the direction of a credentialed school psychologist. The internship requirement may be waived with verification of a full year of professional school psychologist experience on a valid state-issued school psychologist credential, or an Illinois provisional school psychologist certificate, and has such additional qualifications as may be required by the State Board of Education; or 2) hold a valid NCSP credential. Applicants with a valid, comparable out-of-state license, a master's degree from an accredited institution of higher education, and a NCSP credential may also receive school psychologist licensure.
 - **School Social Worker:** Applicants for school social worker licensure must obtain a master's degree in social work and complete coursework specifically designed for performing social work in schools in order to be
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licensed as a school social worker. Additionally, applicants must complete an internship of at least 600 contact hours in a school setting and pass a licensure test before receiving licensure. Illinois does have reciprocity with comparable out of state licenses.

Iowa: Iowa rules regarding the license types affected by this rule are as follows:

- **School Nurse:** There is no school nurse certification requirement for school nurses.
- **School Psychologist:** Applicants for school psychologist licensure must complete a program of graduate study that is currently approved the National Association of School Psychologists (NASP) or the American Psychological Association, or hold the NCSP, in preparation for service as a school psychologist through one of the following options: 1) completion of a master's degree with sufficient graduate semester hours beyond a baccalaureate degree to total 60; 2) completion of a specialist's degree of at least 60 graduate semester hours with or without completion of a terminal master's degree program; or 3) completion of a doctoral degree program of at least 60 graduate semester hours with or without completion of a terminal master's degree program or specialist's degree program. A nonrenewable license may be issued to an individual who must complete an internship or thesis as an aspect of an approved program leading to the school psychologist endorsement.
- **School Social Worker:** Applicants for school social worker licensure must obtain a master's degree in social work and complete a practicum program in order to obtain receive endorsement as a school social worker. Iowa has a school social work endorsement and a statement of recognition as options for licensure. For the school social work endorsement, applicants must complete a minimum of twenty hours of course work related to assessment, intervention, resource coordination, and education and a practicum in a school setting. For the statement of recognition, a license through the state licensing board is also necessary.

Michigan: Michigan rules regarding the license types affected by this rule are as follows:

- **School Nurse:** School nurse is a protected title in Michigan and the Department of Education authorizes the title.
- **School Psychologist:** Applicants for preliminary school psychologist certification must meet the following requirements: 1) complete a graduate degree in an approved school psychology certification program of no less than 45 semester credit hours; 2) complete a supervised internship of a minimum of 600 clock hours in school psychology; and 3) possess a valid out-of-state school psychologist certificate or license if the school psychologist program was completed in another state. Individuals that hold a valid or expired preliminary school psychologist certificate and complete a state-approved specialist-level degree or the equivalent (no less than 60 semester credit hours) in school psychology with a 1200 clock-hour internship from an educator preparation institution are eligible for receiving the full school psychologist certificate. Michigan also accepts the NCSP credential for certification of out-of-state applicants and for renewal of certification.
- **School Social Worker:** Applicants for school social worker licensure must obtain a master's degree in social work from a graduate school of social work program and complete a social work practicum of at least 500 supervised hours in order to receive licensure as a school social worker. Temporary approval shall be granted to a school social worker for the initial year of service. For full approval, a school social worker must also have documentation from employing distinct of satisfactory completion of 1 year of service.

Minnesota: Minnesota rules regarding the license types affected by this rule are as follows:

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- **School Nurse:** Districts with 1,000 students or more are required to hire at least one full time licensed school nurse. Schools under 1,000 have no similar requirements. In Minnesota, a license to work as a school nurse is obtained through the Professional Education Licensing and Standards Board). In order to be eligible for that license, registered nurses need to have a public health nursing certificate from the Board of Nursing in addition to their RN license. Applicants are eligible for the public health nursing certificate through public health coursework in the classroom and clinical settings in a bachelor of nursing (BSN) program. All Minnesota BSN programs offer the public health coursework but many out of state transfers have not had the clinical portion. School nurses who obtain the school nurse license use the credentials of “LSN” to indicate this licensure.
- **School Psychologist:** Applicants for school psychologist licensure must graduate from a NASP-approved program or hold the NCSP credential in order to receive licensure. Individuals are eligible for temporary school psychologist licensure if they hold a master's degree in school psychology or have completed two years of graduate school training. This license is granted on a temporary basis for up to two years and may be renewed up to three times. Graduates from non-NASP approved programs and interns may be eligible for this license.
- **School Social Worker:** Applicants for school social worker licensure must provide evidence of completing a program accredited by the Council on Social Work Education and evidence of holding current Minnesota Board of Social Work licensure. An MSW is not required, nor is specific school social work coursework or practicum.

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