

Report From Agency
FINAL REPORT
CLEARINGHOUSE RULE 21-077
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 proposed rule amends ch. PI 34 to provide educator preparation programs the latitude to address student teaching requirements in the clinical programs they offer. The proposed rule provides that a teaching candidate's pre-student teaching requirements may be completed in a variety of settings related to effective instruction, safe and supported students, family and community engagement, or building meaningful relationships with students in prekindergarten through grade 12. The proposed rule also provides that a teaching candidate's student teaching may also occur in alignment with the cooperating school's current plan for teaching and learning, which may include face-to-face, virtual, hybrid, synchronous, or asynchronous settings, and shall be for full school days for a full semester of the cooperating school or its equivalent as approved by the state superintendent. Finally, the proposed rule creates flexibility by allowing cooperating teachers, who would otherwise not meet current rule experience requirements, to be assigned if they have been recommended by their principal and deemed acceptable by the approved program.

The hearing notice was published in the October 11, 2021 edition of the Wisconsin Administrative Register. A public hearing was held on November 1, 2021.

No persons submitted testimony at the November 1, 2021 hearing. However, the following persons submitted written testimony:

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Wade Tillett	University of Wisconsin-Whitewater		X	
Jennifer Collins	University of Wisconsin-Platteville		X	
Suzanne Purpero	Milwaukee Teacher Education Center			X
Wendy Kropid	Representing Self			X
Desiree Pointer Mace	Alverno College	X		
Jodi Eastberg	Alverno College	X		
Kimberly Jacobson	Alverno College	X		
Deanna Schultz	University of Wisconsin-Stout			X

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

- Some respondents argued in favor of changes which allow student teaching to be completed in a variety of settings. They believe this rule change is aligned with the reality of education in a post-pandemic world. Further, they believe the addition of “a full semester or its equivalent” in the rule will allow teacher candidates who may require flexibility around the completion of a full semester, such as for medical or other needs, to have time to demonstrate their readiness for Tier II teacher licensure. Additionally, they argued in favor of changes to the requirement that pre-student teaching clinical experiences be conducted in a variety of school settings due to the pre-student teaching clinical experiences more widely available to candidates across the state. Additionally, the respondents argued in favor of the change which would allow a student teacher’s observations to be conducted via recorded instruction, reviews of lesson plans, or teaching materials lesson and believes this provides more opportunity for the cooperating teacher or program supervisor to provide formative feedback to the candidate throughout the teaching cycle. Finally, the respondents argued in favor of the change which would allow cooperating teachers to be assigned to a student teacher, believing that this provides flexibility to smaller school districts which may find it difficult to find an on-site supervisor who meets the current rule experience requirements.

Agency Response: The comments above are aligned with the intent of the proposed rule. However, upon review of the comments, the department made some changes to the proposed rule with regard to the observation requirements for student teachers. Under this change, the list of what constitutes an observation under s. PI 34.023 (2) (h) 1. was refined to align with common understanding of what constitutes observable delivery of instruction to students. As such, written artifacts were removed as demonstrations of observed instruction and reflective discussions were removed as redundant based on existing practices. Under the change, if synchronous observations are not possible, observations may include a recording of the student delivering instruction. Additionally, s. PI 34.023 (2) (h) 2. was changed to require that at least one evaluation must be completed by a program supervisor affiliated with the educator preparation program to ensure a review by the preparation program continues to take place.

- One respondent argued against the change which would allow classroom observations to be completed by a cooperating teacher. The respondent argued that the cooperating teacher already provides feedback and the point of a university supervisor or similar is to get different feedback which may be more in line with current best practices and research of which the cooperating teacher may be unaware.

Agency Response: The educator preparation program is responsible for determining that candidates are proficient in the teacher standards in subch. II of PI 34. Program supervisors have relevant training and experience to conduct observation and evaluation of candidates. The proposed rule provides for additional flexibility for the ways in which observations may be conducted in order to provide options other than face-to-face observations of teacher candidates by program supervisors. As a result of the comments above, the department is amending s. PI 34.023 (2) (h) 2. to provide that at least one written evaluation shall be done by the cooperating teacher and at least one by a program supervisor.

- Some respondents voiced concern with the rule change which would allow students to complete their student teaching experience during summer or interim session courses. They argue that a student’s teaching experience that occurs only during the summer is very different from a student teaching experience that occurs during the regular school year in that it does not have the same framework or structure as the regular school year. To ensure equivalent and thorough experience, preparation, and evaluation for the student teacher during the summer or interim session, some respondents argue for language that a student’s teaching experience only be permitted during the summer or interim sessions when unforeseen circumstances arise during the academic year that affect student teaching, or that the rule should be in alignment with the current plan for teaching and learning as well as the school’s regular year staffing, student body, curriculum, assessment, grading practices, student/family activities, parent-teacher conferences, and staff development and evaluation.

Agency Response: Current statutes provide that for educator preparation programs leading to the student's first license, the student teaching shall be for full school days for a full semester of the cooperating school or its equivalent as approved by the state superintendent. As such, educator preparation programs have the flexibility to seek approval from the state superintendent to offer student teaching experiences that differ from but are equivalent to a full-time full semester of student teaching. Upon review of the comments provided at the hearing, the department will be removing the proposed change which would have allowed students to complete their student teaching experience during summer or interim session courses.

- One respondent requested consideration for rule changes which would allow student teaching candidates to complete their student teaching experience over the course of multiple options such as the traditional school schedule, virtual teaching, summer school and after-school teaching, believing this change will assist in addressing shortages in the state's teaching pool.

Agency Response: With respect to permitting student teaching candidates to complete their student teaching experience during the traditional school schedule, virtual teaching, or summer school, s. 118.19 (3) (a), Stats., provides that for educator preparation programs leading to the student's first license, the student teaching shall be for full school days for a full semester of the cooperating school or its equivalent as approved by the state superintendent. As such, educator preparation programs have the flexibility to seek approval from the state superintendent to offer student teaching experiences that differ from but are equivalent to a full-time full semester of student teaching. Thus, with respect to permitting student teaching candidates to complete their student teaching experience using after-school teaching, the suggested change above is outside the scope of the proposed rule. No further changes are necessary.

- Some respondents requested consideration for a rule change which provides that a student's teaching experience may occur in alignment with the educator preparation program's academic calendar, rather than an equivalent approved by the state superintendent in statute. The respondents argue such a rule change would ensure that candidates have access to various means, modalities, and timelines to complete student teaching requirements.

Agency Response: Section 118.19 (3) (a), Stats., provides that no teacher preparatory program in this state may be approved by the state superintendent unless each student in the program is required to complete student teaching consisting of full days for a full semester following the daily schedule and semester calendar of the cooperating school or the equivalent, as determined by the state superintendent. As a result, the comment above is outside the scope of the proposed rule. No further changes are necessary.

- One respondent voiced concern about the use of "or" in the change which would allow a pre-student teacher to complete their experience in a variety of school settings related to effective instruction, safe and supported students, family and community engagement, or building meaningful relationships with students in prekindergarten through grade 12. The respondent believes this change encourages pre-student teaching clinical experiences to potentially focus on demonstrated performance without requiring demonstrated effective instruction and allows candidates to potentially have no real-life practice or feedback in effective content area instruction prior to student teaching, which they argue sidesteps the purpose of pre-student teaching. To address these concerns, the respondent requests consideration of changes which would require the experience to be completed in a variety of settings related to effective instruction relevant to the school's curricular plan and safe and supported students, family and community engagement, or building meaningful relationships with students in prekindergarten through grade 12.

Agency Response: The existing rule already provides that a candidate’s pre-student teaching experience must occur in a variety of school settings, which is not being affected by the proposed rule. No further changes are necessary.

- One respondent raised concerns about the rule deleting the language that written evaluations be made available to employers selected by the candidate, believing this change would ensure employers have access to a broader sampling of the candidates observed/evaluated performance, particularly if conducted by both university or program-based supervisor and cooperating teacher.

Agency Response: This language was not deleted from the current rule. No further changes are necessary.

Changes to the analysis or the fiscal estimate:

No changes were made.

Responses to Clearinghouse Report:

5. Clarity, Grammar, Punctuation and Plainness:

The department reviewed the proposed corrections and determined that no change was necessary as this reflection occurs as part of the conceptual framework in the educator preparation program.

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

The department has identified a grammatical change in s. PI 34.023 (2) (intro.) that is necessary to improve clarity in the rule. As such, the provision is being amended to read “For educator preparation programs leading to a teaching license, each student shall have a student teaching experience which meets all of the following requirements:”.