

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) Chapter PI 34, Educator Licenses		
4. Subject Pre-student teaching requirements for supplementary license areas		
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 revises ch. PI 34 of the Wisconsin Administrative Code by eliminating the pre-student teaching requirement under s. PI 34.023 (1) for individuals seeking licensure in a supplementary licensure under subch. IX of ch. PI 34, Wis. Admin. Code, clarifying that only the student teaching requirement under PI 34.023 (2) applies to this license area and replacing references to "clinical program" with "student teaching."		
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 January 10, 2025, and did not receive any comments on the statement of scope for the proposed rule.		
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) State: The proposed rule change is expected to have minimal to no fiscal impact on the state. By clarifying that the pre-student teaching requirement does not apply to individuals seeking supplementary licensure, the rule reduces unnecessary administrative and compliance burdens on educator preparation programs and school districts. Additionally, since the rule does not create new licensure requirements or expand the pool of eligible applicants beyond existing policy, it is unlikely to generate significant new costs or revenue for the state. Overall, the fiscal impact is expected to be neutral or slightly positive due to increased efficiency in the licensure process. Local: The proposed rule change is expected to have a minimal to neutral fiscal impact on local entities, including school districts. By removing the pre-student teaching requirement for individuals seeking supplementary licensure, the rule		

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reduces the administrative burden on school districts that partner with educator preparation programs to provide these experiences. This may result in minor cost savings for districts that would otherwise need to allocate staff time and resources to supervising and evaluating pre-student teaching candidates who do not require this experience for their license. Additionally, educator preparation programs may see reduced costs associated with placing and overseeing candidates in unnecessary clinical experiences. However, because the rule does not impose new fiscal obligations on districts, its overall impact at the local level is expected to be negligible.

15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule

Chapter PI 34 of the Wisconsin Administrative Code contains the rules governing the licensure of school personnel, including the rules governing clinical programs for students in a Wisconsin approved educator preparation program. Clinical programs must include pre-student teaching for programs leading to a teaching license, and a practicum program for programs leading to pupil services or administrative licensure. These experiences must follow a developmental scope and sequence, occur in diverse settings, and enable students to demonstrate knowledge of state standards through assessments and evaluations. For pre-student teaching specifically, each student must have onsite, supervised experiences with at least two written evaluations by the cooperating teacher or program supervisor. All clinical programs must use cooperating teachers or supervisors who meet criteria for licensure, experience, and training.

Since the rules were promulgated, the department has identified a rule change which is necessary to clarify the preparation requirements for individuals seeking licensure in a supplementary license area. While the pre-student teaching requirement was never intended for individuals working in a supplementary license area under subch. IX of ch. PI 34, Wis. Admin. Code, the rules incorrectly require that applicants seeking several licenses must complete a clinical program in the license area, including pre-student teaching. To correct this issue, the department proposes a rule change that will ensure clarity in the processing and issuing of supplemental licenses as intended. The proposed rule change would remove the clinical program requirement to accurately reflect that only the student teaching requirement under s. PI 34.023 (2), Wis. Admin. Code, applies to this license area. Specifically, references to the term “clinical program” will be replaced with “student teaching” as it applies to the supplementary licenses listed under subch. IX of ch. PI 34, Wis. Admin. Code. Without a rule, the department would be required to enforce the rules as they currently exist, and eligible applicants for supplementary licensure may be precluded from obtaining a license.

16. Long-Range Implications of Implementing the Rule

The long-range implications of implementing this rule change will enhance the efficiency and clarity of the licensure process for individuals seeking supplementary licenses. By eliminating the unintended requirement for pre-student teaching in this license area, the rule change reduces unnecessary burdens on applicants, educator preparation programs, and school districts, ensuring that the licensure process remains aligned with the original intent of the rule. This adjustment will also help streamline the credentialing process, allowing qualified educators to obtain supplementary licenses more quickly while maintaining essential student teaching requirements. Over time, this clarification may improve workforce flexibility, allowing school districts to address staffing needs more effectively. Additionally, the rule change minimizes confusion and administrative challenges for future applicants and program administrators.

17. Compare With Approaches Being Used by Federal Government

Because educator licensure in the United States is typically governed by each state and local government, federal regulations are generally silent with respect to the issuance of teacher licenses. As a result, the requirements for licensure vary by state.

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

Illinois: Illinois requires teachers seeking supplemental endorsements (specifically bilingual, gifted, and reading) to engage in additional coursework and pass the appropriate test.

Iowa: Completion of either student teaching or a practicum course is required to add some endorsements to the underlying license. see IAC 218.14.2 and 282.13

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Michigan: For new teachers, Michigan requires an apprenticeship (similar to pre-student teaching) and an internship (comparable to student teaching). Those seeking a special education endorsement also need to complete an additional 8-week Internship placement in the area of endorsement, but not an additional apprenticeship. If a licensed teacher is seeking to add an additional endorsement, they need additional student contact hours. (Mich. Admin. Rules for Special Education R340.1782)

Minnesota: For initial licensure, students need at least 100 school-based hours prior to student teaching. Candidates who are already licensed and want to get an additional license or endorsement engage in a practicum experience that addresses any gaps in prior experience.

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