

State of Minnesota
Board of Education

Statement of Need and Reasonableness for
Proposed Rule 5 MCAR § 1.0533

Concerning: The proposed adoption of a rule governing the licensure of head varsity coaches of interscholastic sports in senior high schools.

The proposed rule 5 MCAR § 1.0533 is necessary to implement licensure standards and procedures for head varsity coaches of interscholastic sports in senior high schools. At present, only head coaches in six boys' sports are required to hold licensure. Those sports are football, baseball, basketball, track, wrestling, and hockey. A rule which was to become effective in 1972 governing licensure of coaches of interscholastic sports for girls was repealed after the Commissioner of Human Rights determined that discrimination in the applicability of two separate coaching licensure rules, with differing criteria, one for boys' interscholastic sports and one for girls' interscholastic sports, would have existed. Subsequently, numerous meetings and public hearings were conducted in an attempt to enact an equitable coaching licensure rule which would not necessitate the elimination of athletic opportunities for students in secondary schools.

Proposed licensure rule 5 MCAR § 1.0533 was developed after input and meeting with the following organizations and agencies: Minnesota Board of Teaching; Minnesota School Boards Association; Minnesota Education Association; Minnesota Federation of Teachers; Minnesota State High School League; Association of Metropolitan School Districts; Minnesota State High School Coaching Association for Boys and Girls; Minnesota State High School Athletic Directors' Association; Minnesota colleges and universities involved in teacher preparation; Minnesota Congress of Parents, Teachers and Students; and the Minnesota Association of School Administrators. These organizations responded to invitations and took part in meetings and provided input. Many other organizations were invited but did not respond. In addition, every school district in the state received a proposed draft of the rule and many of the districts did respond in writing to the proposed draft. The State Board of Education believes that the proposed licensure rule 5 MCAR § 1.0533 has had extensive input and development through the process described above, and that the proposed rule is both needed and reasonable.

5 MCAR § 1.0533 is needed to assure that those persons serving as coaches of interscholastic sports meet minimally acceptable standards. The proposed licensure rule is premised upon the assumption that coaching is teaching; therefore, this proposed rule requires head varsity coaches of interscholastic sports in senior high schools to hold a valid Minnesota elementary or secondary teaching license.

Section A. of the proposed rule addresses the requirement of a teaching license and the completion of a coaching preparation program approved by the Minnesota Board of Education leading to licensure of head varsity coaches of interscholastic sports. Programs of interscholastic sports are an integral part of the total school program and should be so designed as to be of educational value. Therefore, the Board believes that it is essential that coaches of interscholastic sports meet the licensure requirements stated in this rule and hold a Minnesota teaching license.

Section B. defines the head varsity coach as a teacher who has primary responsibility for a senior high school varsity interscholastic sport. Interscholastic sports are defined as those sports in which there is scheduled competition with athletic teams of another school within and outside the school district. A senior high school for purposes of this rule is defined as a secondary school consisting of grades 10-12 or grades 9-12 in a four-year secondary school, or grades 9-12 in a six-year secondary school. It is the position of the Board of Education that those ninth grade students taking part in varsity interscholastic sports in a four-year or six-year secondary school should be included in the licensure rule for their health and safety.

Section C. is a compromise included after previous public hearings indicated that a severe shortage of coaches will result if assistant coaches and junior high school coaches are required to hold licensure. Testimony also showed that programs would be severely curtailed and/or limited if this limitation is not included in the rule. Therefore, the proposed rule applies only to head coaches; it does not require licensure for assistant coaches and junior high coaches.

Ideally, the Board believes that assistant coaches and junior high school coaches should be prepared at least in the areas of first aid and care and prevention of athletic injuries. It is anticipated that school districts will endeavor to provide this minimal training on an inservice basis for assistant coaches and junior high school coaches. The decision not to require licensure for assistant and junior high school coaches is based upon several factors. The Board recognizes that there has been a vast increase in school athletic programs and in participation, particularly for girls. This fact, together with declining enrollments and associated declines in school revenues, has created problems for staffing of the programs. The Board believes that by excluding assistant and junior high school coaches from the licensure requirement, the vast majority of the staffing problems will have been eliminated. It should be recognized, however, that no licensure rule will eliminate all staffing problems and should not be expected to do so.

Section D. of the proposed rule specifies the qualifications for coaching licensure. It is designed to contain the components determined by previous task forces to provide essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport. It should be noted that the rule establishes a maximum of 12 quarter or 9 semester hours of credit for all coaching programs that are submitted to the Board of Education for approval.

The Board recognizes that this attempt to limit programs to 12 quarter or 9 semester hours of credit may be opposed by a number of Minnesota colleges and universities. A number of colleges and universities will state that they are unable to prepare coaches with such a restricted number of credits. While many of the coaching programs in Minnesota colleges and universities currently range from 30 to 40 quarter hours of credit, it is the position of the Board that programs of such length are unnecessary to provide acceptable coaching ability, are prohibitive in length, and accentuate recruiting problems at the school district level. It is the position of the Board of Education that a preparation program consisting of 12 credits is a reasonable number of credits for licensure, and that colleges will be able to redesign and restructure some of their courses to accomplish a preparation program which provides the essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport within the parameters of this rule.

The 12 credits pertain only to those teachers who desire a coaching endorsement and are not physical education majors or minors. Persons who are preparing to be physical education teachers will, as part of their program, have completed a coaching preparation endorsement. This proposed rule does not prohibit a college or university from offering a coaching minor or major or a more extensive program for those who desire more preparation. It simply requires completion of an approved program consisting of a maximum of 12 quarter credits for licensure as a coach of interscholastic sports.

Section E. of the proposed rule is an alternate route to licensure. It permits a school district to contract with a college or university which offers an approved coaching licensure program and to develop a joint program that can be offered on an inservice basis in a Minnesota school district. This portion of the rule is intended to create flexibility for those school districts that desire to prepare their own coaches on an inservice basis in conjunction with a college or university.

Section F. is a "grandperson" clause which states that teachers employed as a head varsity, assistant, or junior high school coach can be granted a coaching license provided that 6 quarter hours or 60 clock hours of instruction in first aid and the care and prevention of athletic injuries have been completed. It is the deliberate intention of Section F. to be generous in grandpersoning those teachers that have been serving as coaches and assistant coaches in order not to restrict the supply of coaches available for interscholastic coaching positions. The Board, however, does feel that no grandpersoning should occur unless evidence can be provided of the minimal preparation specified in first aid and the care and prevention of athletic injuries. It should be noted that the Department of Education will be flexible in accepting 60 clock hours of instruction on an inservice basis through the Red Cross or other appropriate agencies.

Section G. of the proposed rule establishes an effective date of July 1, 1982. This effective date is deemed reasonable because of the generous grandpersoning clause which will not curtail the present supply of coaches. In addition, it is thought to be reasonable in terms of college preparation programs because at present there are 22 Minnesota colleges and universities that offer coaching programs and the rule should not necessitate the development of any new programs.

Section H. In previous public hearings involving coaching licensure, school districts indicated that unless special provisions were made for emergency licensure they would be required to curtail or eliminate some athletic programs. Section H. of the proposed rule is intended to address hardship situations where a district may request of the Commissioner of Education a provisional license for a teacher to serve as an interscholastic coach while the preparation program is being completed in a Minnesota college or university.

This section requires that the provisional license be granted only to teachers. The Board of Education does not believe that it is necessary or responsible to include the possibility of granting a provisional license to those persons not holding a valid teaching license. The Board believes that the hardship situations that districts may face can be accommodated by the provisions outlined in Section H. of the proposed rule.

Section I. specifies that coaching licenses may be renewed under the same system that coaches use to renew their teaching licenses in other fields. It will not be necessary for coaches to follow a separate system for renewal of the coaching license.

In summary, the State Board of Education believes that this proposed coaching licensure rule is both needed and reasonable. The Board believes that the preparation outlined in the rule is the minimum amount of preparation needed to serve as a head varsity coach, while at the same time providing for any potential hardship situations that school districts may face in staffing coaching positions.