

STATE OF MINNESOTA

BOARD OF TEACHING

STATEMENT OF NEED AND REASONABLENESS

Concerning the Proposed Adoption of Rules Governing Examinations for Teacher Licenses, Minnesota Rules, Part 8700.0210; Provisional Licensure, Minnesota Rules, Part 8700.0502; Teachers of Business, Minnesota Rules, Part 8700.4710; Amending of the Issuance and Renewal of Continuing Licenses, Minnesota Rules, Parts 8700.0900 - 8700.2300; the licensure of Librarians, Minnesota Rules, Part 8700.5900; and Teachers Prepared in States Other Than Minnesota, Minnesota Rules, Part 8700.7800; and Repealing of Minnesota Rules, Parts 8700.2600, 8700.4700, and 8700.5000.

The statutory authority of the Board of Teaching to adopt the proposed rules is set forth in Minnesota Statutes, Sections 125.05, subd. 1 and subd. 6, and 125.185, subd. 4.

RULES AS PROPOSED

Minnesota Rules, Part 8700.0210 Examinations for Teacher Licenses

Minnesota Rules, Part 8700.0210 is needed whereby the Board of Teaching establishes the procedures to implement the requirement of examination of skills in reading, writing, and mathematics for persons applying for initial licenses, as authorized by Minn. Stat. § 125.05, subd. 1 and Minn. Stat. § 125.185, subd. 4.

Subpart 1 sets forth the applicability as set forth in Minn. Laws 1985, Spec. Sess., ch. 12, art. 8, sec. 66 and Minn. Stat. §§ 125.03, subd. 5 and 125.05, subd. 1.

Subpart 2 provides procedures to be utilized by the Board of Teaching in the selection of a party to provide for the development, validation, and implementation of a statewide examination system. As required by Minn. Laws 1985, Spec. Sess., ch. 12, art. 8, sec. 46, proposed examinations must be validated by another state or reputable national testing organization and field tested in Minnesota.

Subpart 3 is necessary to implement Minn. Stat. § 125.05, subd. 1 which requires successful completion of examination of skills in reading, writing, and mathematics. Subpart 3 defines successful completion as determined by a validation process to establish minimum passing scores.

Subpart 4 is necessary to provide reasonable and appropriate notice of the examination(s) adopted by the Board of Teaching and the minimum passing scores to be achieved.

Rules of the Board of Teaching require that colleges and universities verify that applicants have completed all requirements for licensure.

Subpart 5 is necessary to ensure that applicants for licensure have successfully completed examinations of skills in reading, writing, and mathematics as part of the licensure requirements prior to issuance of an initial Minnesota teaching license. It is reasonable to expect that colleges and universities will attest that the examination requirement has been met.

Subpart 6 is necessary to provide a means for administration, scoring, and reporting of the examinations. The means set forth in Subpart 6 are reasonable in that they establish an efficient and cost effective procedure for administration, scoring, and reporting of the examinations. These means provide assurance that examinations will be administered on a timely basis. It is reasonable to expect that applicants will be responsible for seeking information concerning examination administration procedures since, in accordance with subpart 4, identification of the examinations adopted will be published in the State Register and colleges and universities will also be notified. It is also reasonable for the Board of Teaching to expect that examinees' scores will be made available to attending institutions and to the Board of Teaching since successful completion of these examinations is a requirement for initial teaching licensure.

Subpart 7 is necessary to provide for the approval of an examination fee. This fee is reasonable in that it is based upon the actual costs incurred for administration, scoring, and reporting of the examinations taken by each candidate for licensure.

Subpart 8 is necessary to implement Minn. Stat. § 125.185, subpart 4 which provides for the completion of the examination of skills in reading, writing, and mathematics before entering or during a teacher education program. It is reasonable to require that candidates for licensure will take skill area examinations prior to enrolling in upper division or graduate coursework in the professional education sequence so that their skill level may be determined near the beginning of their professional preparation. Candidates who fail to achieve minimum passing scores will then have time and opportunity to enhance their skills prior to completion of professional preparation. It is also reasonable to expect that colleges and universities will provide advisement and assistance to candidates who fail to achieve the minimum passing scores and wish to secure opportunities to increase their skill levels.

Subpart 9 is necessary to accommodate candidates who are currently enrolled in upper division or graduate level coursework in the professional education sequence. It is reasonable to permit candidates who are currently enrolled in such coursework prior to the applicable date of this rule to take the examinations while enrolled in upper division or graduate coursework, since these candidates will not have had the opportunity to take the examinations prior to enrolling in such coursework.

Subpart 10 is necessary to provide opportunities for candidates to retake the examinations. It is reasonable to permit ample opportunities for candidates to demonstrate successful completion of these examinations prior to licensure recommendation.

Subpart 11 is necessary to ensure that applicants for Minnesota licensure who are prepared in other states meet Minnesota examination requirements. It is reasonable to permit such persons a period of time to meet the examination requirements, since they may not have had the opportunity to do so prior to applying for a Minnesota teaching license. One year is a reasonable amount of time for such persons to have the opportunity to meet this requirement, since

Subpart 6 assures that examinations will be administered at least 4 times per year in Minnesota.

Subpart 12 is needed to assure that the examination system continues to operate in accordance with this part. It is also needed to assure that adequate notice is provided concerning any modifications in the system. It is reasonable to expect that the Board of Teaching will review the system. It is also reasonable and appropriate to provide notice of any modifications. Thirty days between publication of notice of modifications and administration of examinations provides adequate time.

Minnesota Rules, Part 8700.0502 Provisional Licenses; Teaching in Unlicensed Subjects or Fields

Minnesota Rules, Part 8700.0502 is needed to set forth criteria and procedures whereby the Board of Teaching provides for provisional licensure as authorized by Minn. Stat. § 125.05, subd. 6. These criteria establish the procedures to be utilized and the conditions to be met in order for the Board of Teaching to grant provisional licenses. Reasons for granting or denying provisional licenses must be in writing. The Board of Teaching contends that these criteria and procedures for granting provisional licenses are both needed and reasonable in order to provide a means whereby school districts can fill teaching positions in critical areas of licensure when the Board of Teaching has determined that no teacher licensed in that area is available for the position, and to provide consistency in the application of criteria for granting such provisional licenses.

Minnesota Rules, Parts 8700.0900 through 8700.2300. The Issuance and Renewal of Continuing Licenses.

The Board of Teaching convened a continuing education/relicensure review committee on May 15, 1984, with the following charge from the Board of Teaching:

- Examine and study relicensure systems currently implemented by other professional licensing boards and agencies in Minnesota.
- Review past continuing education/relicensure task force recommendations and Board of Teaching continuing education/relicensure survey results.
- Identify and recommend components among the various relicensure systems governing education personnel in Minnesota which might serve as a basis for articulation among the systems.
- Make recommendations to the Board of Teaching regarding the continuing education/relicensure system for teachers in Minnesota and report such recommendations by September 1, 1985.

The committee met monthly from September, 1984, through August, 1985. In order to fulfill its charge and to determine whether the present continuing education/relicensure system needed major changes or whether the focus should be to redefine and streamline the current categories within the rule, the committee: (1) studied a number of topics and issues, (2) developed and analyzed a survey which assessed teachers' perceptions of the

relicensure system, and (3) determined a set of concepts which would be important to consider in any revision of the continuing education system.

The following topics were studied by the committee:

- the four relicensure systems for education personnel in Minnesota (K-12 teachers, vocational teachers, standard administrators and supervisors, vocational administrators and supervisors)
- three continuing education/relicensure surveys conducted by Dale Rapp for the Board of Teaching
- past continuing education/relicensure task force recommendations
- research on school effectiveness
- continuing education requirements of Minnesota licensing boards
- continuing education requirements of other states
- personal growth/professional growth
- a previous task force statement on professional growth dated 5-14-76
- selected local committee guidelines and the variation in number of units granted
- legislative concerns regarding continuing education
- HECB Report on Teacher Education, Chapter X, Continuing Professional Development and Inservice Education
- Minnesota Business Partnership Report, Governor's Commission on Education for Economic Growth Report
- School Management Task Force, Center for Educational Excellence
- Relicensure for substitute teachers
- Career licenses

The committee also developed a questionnaire to elicit responses regarding the current continuing education systems from licensed, practicing educators who hold continuing licenses. This questionnaire was mailed to a random sample of 1,025 vocational and nonvocational (standard) teachers and administrators. 658 responses were returned and included in the computer analysis of the data. Persons were also asked to respond to six open-ended questions which were subsequently reviewed and summarized by the committee.

Generally, the responses were positive regarding the system and the process; however, half of the respondents also believe that the current relicensure system needs to be improved. Three-fourths of the respondents feel that all educators should have the same unit of measurement (i.e., renewal units or clock hours) for relicensure. Ninety-five percent of the respondents believe that experiences which satisfy individual personal growth should be permitted for relicensure purposes. (47 percent believe

that up to 30% of the total should be permitted, another 28% believe that 11% - 20% should be permitted, and 20% believe that up to 10% should be permitted.) Eighty-one percent believe that the present continuing education/relicensure system has held them professionally accountable, and 78% are generally satisfied with the current relicensure process. Many suggestions for improvement in the system were offered for consideration by the committee.

In addition to studying a number of topics and analyzing the results of the survey, the committee also addressed its view of the future of continuing education/relicensure. Nominal group process was used to generate individual ideas which were then presented to the group, clarified, categorized, and prioritized. From this process, the group determined that the following concepts were important in any revision of the continuing education system:

- Teacher initiated
- Self improvement
- Goals and strategies for reaching goals
- Periodic review of goals
- Five-year cycle
- Fewer categories
- More consistency among relicensure systems
- Professional effectiveness
- Meaningful professional development
- Maintaining local autonomy

As a result of study, survey data, and a look to the future, the committee developed a set of proposed revisions in the current rule. Since all the information available to the committee suggested refinement of the existing system, the committee determined that no major changes in the system were necessary, and that rather, emphasis should be placed on articulation with vocational and administrative relicensure systems and on redefining and streamlining the categories within the current rule.

The proposed revisions consist of the following:

- a change from 120 renewal units to 125 clock hours required for relicensure
- redefining and streamlining the current categories
- requiring that a minimum of 90 clock hours be earned in college courses, workshops or conferences, staff development, inservice, or curriculum development activities. College coursework will be rated at 15 clock hours for each quarter credit earned or 20 clock hours for each semester credit earned; other activities will be rated at one clock hour for each hour of participation.
- permitting a maximum of 35 clock hours to be earned in professional service, leadership experiences, and opportunities which enhance knowledge and understanding of diverse educational settings. In general, every 3 hours of participation will equal one clock hour for these categories.
- minor editorial changes.

In order to make the relicensure systems more compatible, the committee determined that clock hours, rather than renewal units, should be the appropriate unit of measurement. The Board of Teaching is the only licensing board using the renewal unit measure. All other licensing boards in Minnesota, and particularly, the systems for administrative and vocational relicensure use the clock hour as the unit of measurement. Also, to make the continuing education system for teachers more compatible with that of school administrators, the committee determined that the five-year requirement should be 125 clock hours, and that college courses would be rated at 15 clock hours for each quarter credit earned.

The purpose of the continuing education/relicensure system is to encourage professional development. Therefore, the categories in which clock hours may be earned have been redefined to reflect this emphasis and to incorporate changes which focus on a variety of professional development activities. Upon review of studies by the Board of Teaching and the Higher Education Coordinating Board regarding the activities in which teachers currently earn units for renewal, it was found that 75% or more of the activities relate to professional growth. Therefore, the committee determined that it is reasonable to continue this emphasis in the proposed revisions and to make this emphasis more explicit.

The committee also recognized the importance of certain experiences which broaden the insight and effectiveness of teachers which may not be directly related to the teaching area. Teachers have certain community and professional responsibilities which can be considered inherent to their continuing professional growth. These responsibilities and activities are not to be minimized, but neither are they to dominate renewal credits. Therefore, the committee determined a 3:1 ratio for these activities, and a maximum of 35 clock hours, to ensure a valid amount of professional growth activities which are directly related to teaching responsibilities.

The Board of Teaching adopted these revisions which were proposed based upon careful study, analysis, and deliberation by the continuing education/relicensure review committee. The Board of Teaching then disseminated the proposed changes to each local continuing education/relicensure committee for comment and held a series of regional informational meetings for continuing education/relicensure committees.

The revisions focus more directly on professional growth, while continuing to maintain a system of local decision-making regarding these activities. Current emphasis on the importance of professional development as it relates to staff development activities is also reflected in the revised categories. The change from 120 renewal units to 125 clock hours brings a measure of consistency to the standard teaching and administrative relicensure systems. The Board of Teaching believes that these proposed revisions will enhance the continuing education/relicensure system for teachers. A method for transferring renewal units which have been granted prior to July 1, 1987, to clock hours has been provided which assures an equitable transition for teachers. Further, teachers who have been granted 120 renewal units by their local committee prior to July 1, 1987, will be permitted to renew their licenses for one additional five-year period based upon completion of the 120 renewal unit requirement which was in effect prior to July 1, 1987. This provides a reasonable transition for teachers who have met the renewal unit requirement prior to the change to a clock hour requirement.

Minnesota Rules, Part 8700.4710 Teachers of Business

This rule as proposed replaces the obsolete standards of the existing rule and addresses the need for breadth as well as depth in preparation, includes an appropriate blend of theory and practice, provides clarity of intent, allows for inclusion of evolving technologies, and provides flexibility and latitude for institutions to meet the rule.

The Board of Teaching was assisted by persons representing teachers of secondary school business and college faculty who prepare teachers of business. The existing rule consists of core preparation and several area of specialization. The proposed rule combines all areas in a comprehensive preparation program, which more accurately reflects the business curriculum at the secondary school level.

Subpart 1 sets forth the requirements for the licensure of teachers of business in secondary schools. It is reasonable to expect that teachers of business will complete a professional education component which prepares them to teach in secondary schools and also complete the subject matter component which provides the basis for the content to be taught.

Subpart 2 is needed to specify the essential knowledge, skills, and understandings which are necessary to provide teachers of business in the secondary schools with a specialized body of knowledge which is essential to the development of entry-level expertise.

The major responsibility of teachers of business in the secondary schools is to provide instruction that teaches students about the principles and fundamentals of business. To teach the principles of business, a potential business teacher must be well-grounded in business operations. To accomplish this, a study of business structures and functions including international business and business ownership, and the principles of management, accounting, economics, sales and marketing, and business law applied is necessary.

To teach the fundamentals of business, it is imperative that potential teachers be cognizant not only of business operations, but also how these principles are implemented and the requisite skills, knowledge, and understandings required to implement them in the context of current business practices and procedures. To accomplish this, a study of information systems and analysis; current business technologies; computerized business applications including keyboarding and text editing/word processing procedures; originating and presenting oral/written business communications including recording data using written notes or electronic media and transcribing such data; and business behavior including interpersonal relations, leadership, work attitudes, and job seeking skills is essential.

Subpart 3 is necessary to set forth the procedures which approved Minnesota institutions must follow to obtain approval of preparation programs leading to the licensure of teachers of business.

Subpart 4 provides for renewal of continuing licenses in accordance with current standards and procedures set forth by the Board of Teaching.

Subpart 5 sets an effective date for the rule. The effective date provides sufficient time for teacher preparing institutions to develop and submit licensure programs for approval and for persons to complete such approved licensure programs in accordance with this rule.

Minnesota Rules, Part 8700.5900 School Librarians

The need to amend this rule arises because of the necessity to clarify the standards upon which licensure is granted. Historically, licenses as school librarians have been issued only to persons who are also licensed as classroom teachers. The amendment provides explicit language which ensures that persons recommended for licensure as school librarians also hold licensure as elementary or secondary classroom teachers. Because librarians provide direct instruction to students, it is reasonable to expect that such persons are also prepared as teachers. This preparation assures that the knowledge, skills, and understandings necessary to teach are prerequisite to the preparation of teachers who are assigned duties as school librarians.

Minnesota Rules, Part 8700.7800 Teachers Prepared in States Other Than Minnesota

The need to amend this rule arises because of the necessity to provide consistency with the proposed rule governing examinations for teacher licensure for applicants who are prepared in other states. This amendment provides for the granting of a one-year nonrenewable provisional license, during which time the applicant must complete the human relations requirement. Sufficient human relations programs are available throughout the state which enable persons to complete this requirement during the period of the one-year provisional license. The provisional license requires the meeting of specified criteria prior to the granting of an entrance license. The entrance license signifies that all requirements for licensure have been met.

REPEALERS

It is necessary to repeal Minnesota Rules, Part 8700.2600, since this rule contains obsolete language. This rule is in conflict with Minnesota Rules, part 8700.2700, which requires all applicants for licensure to complete the human relations requirement.

It is necessary to repeal Minnesota Rules, Part 8700.5000, since this rule is obsolete. Area Vocational Technical Institutes are under the jurisdiction of the Board for Vocational Technical Education.

It is necessary to repeal Minnesota Rules, Part 8700.4700 because the Board of Teaching has proposed new standards of licensure in this field. *by*

FISCAL STATEMENTS

The Board of Teaching estimates that the proposed rules will not require an expenditure of public monies by all local bodies of an amount which exceeds \$100,000 in either of the two years immediately following adoption of the proposed rules.

SMALL BUSINESS

These proposed rules will not directly affect small business within the meaning of Minn. Stat. 14.115.