

## MINNESOTA STATE BOARD OF VOCATIONAL TECHNICAL EDUCATION

### Statement of Need and Reasonableness for Proposed Rules Governing the Licensure of Postsecondary Vocational Technical Education Administrative Personnel, Director and Assistant Director

The Statutory authority for the State Board of Vocational Technical Education to promulgate these rules is contained in Minnesota Statutes Section 136C.04, subdivision 9, 1986.

#### Rules as Proposed

Minnesota Rules 3700.0900 to 3700.0903 Postsecondary Directors and Assistant Directors of Technical Institutes.

Authority of the State Board of Vocational Technical Education to promulgate these rules is found in Minnesota Statutes Section 136C.04, subdivision 9, 1986, Powers and Duties of the Board which states:

Licensure. The State Board may promulgate rules, according to the provisions of Chapter 14, for licensure of teaching, support, and supervisory personnel in postsecondary and adult vocational education.

The State Board of Vocational Technical Education determined a need to revise postsecondary and extension vocational educational licensure. A review of the existing rules suggested the licensure rules should be clarified for the benefit of existing parties. The rules had not been revised for over ten years. The majority of the issues identified were related to interpretation of the terms relevant education, relevant occupational experience, and vague or nonexistent course work requirements.

The formal rule revision occurs through a process which involves a general advisory committee. Representatives from licensed postsecondary: administrators, supervisory staff, vocational instructors and support staff, private trade schools and the Board of Teaching, State Board of Vocational Technical Education staff, the Minnesota Council of Vocational Education and the State Board of Education Licensure section serves on the committee in an ex-officio status. This committee formulates general licensure guidelines and procedures for selecting individuals to serve on specific committees. This committee then reviews and recommends on the final licensure draft.

A Note of Intent to Solicit Outside Opinion Regarding Proposed Rules for Licensure of Postsecondary Vocational Technical Administrative Licenses was published in the *State Register* on December 7, 1987. Five subcommittee meetings, consultation with the Attorney General's office and the Revisor of Statutes resulted in a proposed rule. The State Board of Vocational Technical Education then made the Final Rule Recommendations.

Proposed Permanent Rules Relating to Administrative Licenses: Director and Assistant Director

3700.0900 GENERAL REQUIREMENTS. This subpart notifies the applicant of the need to meet general licensure rules currently in place as well as the new revised rules specific to the licensure area the applicant seeks.

A. This statement replaces 3515.7300 and 3515.8400 QUALIFICATION FOR LICENSURE with the only change being in rules referenced from 3515.7300 to 3515.7600, now to read 3700.0901 to 3700.0903.

B. This part indicates to the applicant the specific 3515 rule numbers which continue and still apply. 3515.7400 to 3515.8300 remain intact, and are referenced to assure the applicant is apprised of that fact.

C. These parts are deleted for Director, Assistant Director and Adult Extension Director (now covered by Assistant Director license according to 3700.0903). 3515.8400 to 3515.8800 and 3515.9000 are replaced by 3700.0900 to 3700.0903.

## 3700.0901 DIRECTOR IN DISTRICTS OPERATING A TECHNICAL INSTITUTE

Subpart 1. Licensure Requirements. Retains and moves statement from 3515.8700, subp. 1 which identifies requirement to employ a director. There are no changes in this part.

Subpart 2. Identifies the specific activities a director might be responsible for which would require licensure. In revising the activities previously listed in 3515.8700, subp. 2, A through K, the committee more clearly defined the functions but simplified the language, using all previous rule components. There are no major activity changes.

Subpart 3. Licensure Requirement. Clarifies when an individual must be licensed. This part was necessary to assure compliance with the rule despite local titles provided subp. 2 activities are used.

Subpart 4. Licensure Criteria.

### A. Education

1. The degree has been broadened to include any baccalaureate or higher degree. The previous requirement that the degree be in specified vocational services, vocational guidance, counseling or the equivalent was felt to be too narrow. The rationale was "equivalent" had been open for interpretation. In addition, by allowing any baccalaureate degree, future degrees currently in development stages would be included. This is reasonable because the additional specified experiences allow for the breadth and depth of knowledge required for this position and opens up a larger pool of candidates.

2. Three quarters credits in each of the following: Educational Tests and Measurements (evaluation), Methods of Instruction and Course Construction or Development were added. This addition was necessary to assure the applicant is cognizant of educational methods used by instructors under his or her supervision. The content is available through educational programs throughout the state. It is reasonable since an education major or licensed teacher would normally already have the required content. Applicants holding degrees in areas broadened in sub. 3, A would then be exposed to the same educational material which allows for a more common base.

3. This part has been moved from 3515.8700, subp. 3, Licensure Criteria. No changes in this part.

4. This part has been moved from 3515.8700, sub. 3. A new provision allows for clock hours as well as quarter credits and specifies a minimum of three quarter credits (45 clock hours) in instructional supervision in vocational technical education. The remainder may be in educational administration and/or institutional operations. This allows for exposure to situations which deal directly with education, institutions and vocational education. Experience under the existing rule leads to the conclusion that it is vague and difficult to interpret since it did not set parameters on the type of educational experience. This is reasonable because it does not represent an increase in credit or clock hours required.

5. Twelve additional quarter credits or 280 clock hours have been added to assure individuals who apply without the vocational education or service degree will have been exposed to the knowledge, skills and attitudes required of a Director. The course content required relates directly to the activities as listed in subp. 3. It is reasonable to add this subpart, since the degree criteria has been broadened, assurance of competencies in educational leadership is necessary.

B. Experience in Vocational Education. To assure familiarity with the vocational system, the applicant is required to have three years of vocational education experience. State agency experience in vocational education was added since experience includes exposure to most of the activities required in the technical institute systems. The years have been decreased from the current rule of five years in order to recognize the increase in administrative experience from one year to three as represented in C. This is reasonable because the total number of years of experience has not increased. The level of experience has been changed as indicated and reasoned in C.

C. Experience in Administration. This experience has been increased from one to three years. This is reasonable to allow an equal amount of experience on the administrative level for the highest position in a technical institute. The recency clause allows for the applicant to be cognizant of changes which have and are now occurring since the State Board of Vocational Technical Education separated from the Department of Education in 1984. The recency requirement is 2000 hours or one year in the past five and is reasonable since that experience may be in a broad variety of environments.

D. Occupational experience. The occupational experience has been decreased from 6000 hours to 4000 hours. The decrease is justified because the rationale is for exposure to the world of work outside of education rather than expertise in a specific occupational area. The occupational area is not defined because of the inability to identify changes in specific occupations which occur continually.

#### 3700.0902 ASSISTANT DIRECTOR IN DISTRICTS OPERATING A TECHNICAL INSTITUTE

Subpart 1. Assistant Director: When position and licensure required. Clearly identifies activities requiring a license for institutes when an Assistant Director license is required. 3515 rules did not clearly define this resulting in confusion and inconsistency. The 40% time and 4 or more activities allow flexibility to the smaller institutes if there is not enough activity to generate use of an Assistant Director.

Subpart 2. Lists the same activities as Directors license 3700.0901, subp. 2, with the exception that the activities take place when assisting the Director. This is reasonable since the level of administrative education and experience is substantially less than that required of a Director.

Subpart 3 and Subpart 4. Licensure Criteria.

A. Education. 1 through 4 repeats the same criteria as listed for the Director, subp. 4, 1 through 4. The need and rationale are the same. Number 5 is not part of the requirements for the Assistant Director as it is for the Director. This is reasonable since the Assistant Director's duties are assigned and supervised by the Director and the responsibility remains with the Director. This allows the Assistant Director an opportunity to continue educational administrative experience through a career ladder process.

B. Experience in Vocational Education. Same criteria as indicated for the Director, subp. 4, B. Increased to three years from 3515. rule for Assistant Director which required two years of experience. This is reasonable since occupational experience was decreased by 2000 hours allowing the combined experience totals to remain the same. More experience in vocational education and less in occupational allows the applicant the opportunity to become more knowledgeable in the operations of the technical institute system. The Assistant Director is not required to have experience in administration (Director, subp. 3, C) since this individual functions under the direction of the Director and is expected to develop under this system. This experience will allow the applicant to acquire the unique abilities and knowledge under the supervision of the Director.

C. Occupational Experience. Same as for Director, subp. 4, D. Rationale and Need are the same.

3700.0903. Converts existing Director, Assistant Director and Adult Director licenses to new 3700.\_\_\_\_\_ rules. It is reasonable to convert the Adult Director license to the Assistant Director since the functions are essentially the same.

Overlap Period Repealer. This allows applicants a one year period during which applicant may proceed under 3515 or 3700 rule. This is reasonable and necessary since some individuals may be currently preparing themselves under 3515 rule.