

MINNESOTA STATE BOARD OF VOCATIONAL TECHNICAL EDUCATION

**Statement of Need and Reasonableness for the
Proposed Rules Governing the Modification of
Licensure of Postsecondary Vocational Technical
Education Personnel in Business and Office
Occupations**

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

Rules as Proposed:

Minnesota rules 3700.0305 to 3700.0355

Postsecondary vocational license modifications Business and Office Occupational area.

Authority of the State Board of Vocational Technical Education to promulgate these rules is found in Minnesota Statutes section 136C.04, subd. 9, 1986, Power 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.

BACKGROUND INFORMATION

The first revision of Business and Office rules for instructors took place in 1987. The Board authorized the resolution and Notice of Intent to Solicit Outside Opinion was published in the State Register. A Statement of Need and Reasonableness was prepared July 31, 1987, for review by interested persons. The proposed rules appeared in the State Register on September 14, 1987. The State Board of Vocational Technical Education approved adoption of the revised permanent licensure rules for Business and Office Occupations on December 14, 1987. For the purpose of clarification, the original Need and Reasonableness Statement, as well as a copy of the original revised licenses are included with this document.

GENERAL INFORMATION

The Business and Office rules have been in effect for well over a year. An attempt has been made to change ambiguous language as well as intent that is not clear. In addition, some changes have been incorporated which allows for additional experience required in order to teach restructured content which has changed since the original rules have been implemented.

The Legislative Commission to
Review Administrative Rules

BUSINESS AND OFFICE OCCUPATIONS RULES 3700.0305 TO 3700.0355

- 3700.0305 Accounting license
- 3700.0310 Bookkeeping Clerk license
- 3700.0315 Banking and Finance Operations license
- 3700.0320 Banking and Finance Operations/Agriculture license
- 3700.0325 Business Office Management license
- 3700.0330 Administrative Support license
- 3700.0335 Medical Secretarial license
- 3700.0340 Legal Secretarial license
- 3700.0350 Purchasing and Inventory Management license
- 3700.0360 Court Reporting license
- 3700.0365 Personnel Assistant license
- 3700.0370 Computer Programming license
- 3700.0375 Computer Operations license
- 3700.0376 Financial Aid Assistant license
- 3700.0378 Advanced Business Technology license
- 3700.0379 Office Information Processing Specialist license

To review for the purpose of clarity, 3700.0305 through 3700.0379 specifies requirements for each individual license as follows:

Subpart 1. May teach. Lists programs and courses which the license holder may teach.

Subpart 2. Other requirements. Refers to 3700.0100 and 3700.0300.

Subpart 3. Occupational area requirements. Specifies number of hours and specific occupational areas acceptable for instructor licensure in the occupational program.

Subpart 4. Substitution for occupational experience. Degrees, diplomas or coursework is identified which enables the applicant to substitute specific educational experience for a designated number of occupational hours.

Subpart 5. Substitution for recent occupational experience. Identifies relevant current teaching experience which can substitute for a portion of the recency requirement of 3700.0300, Subpart 2.

SPECIFIC LICENSURE RULE MODIFICATIONS

3700.0305. ACCOUNTING LICENSE.

Subpart 1. May teach. There are no changes in items A to E. Item F, payroll and personal finance has been changed to read only payroll. It was determined that an individual that came into the accounting program with the educational and occupational experience required in subpart 3 would not have the experience necessary to do personal finance. Therefore, it was reasonable to remove personal finance from the crossover areas in this license. In items G to I there are no changes. Item J,

introduction to computer operations was changed to read introduction to computers. Computer operations could imply that an individual was doing activities far beyond the scope of an accounting license. Therefore, for the purpose of clarity it was reasonable to change this to computers. Item K, unchanged.

Subpart 2. Unchanged.

Subpart 3. Educational and occupational experience. This subpart was modified and changed to add educational experience. As the programs were restructured, Accounting I and II have been added as credits to be offered in a variety of programs in addition to accounting. Therefore, to assure that an individual has the breadth and depth of knowledge to teach the accounting as required in the new curriculum, it was felt they must have a minimum of nine quarter credits in Principles of Accounting and six quarter credits in Intermediate Accounting. Therefore, due to the change in curriculum this is a reasonable additive to this license. The second change in subpart 3 occurs with a minimum of 2000 hours as a public or private staff accountant with no substitution for these hours. This was inserted due to the ambiguous language in the original license which did not make it clear that that experience could not be substituted. The 8000 hours must include the 2000 hours required under 3700.0300, subpart 2. The change was made to assure that the applicant was aware that the recency requirement must be included. Item A was unchanged. Item B, account manager was eliminated. It was felt that an accountant, whether or not they were a manager of accounting or in another position, would clearly indicate that accounting experience was acceptable. The other items were not changed.

Subpart 4, Item A was amended to read "with a major in." The original rule indicated that a bachelor's degree had to be in accounting or business administration. It is more correct to say "a major in" and, therefore, this is a reasonable change. Item C was amended to include "or a program of 45 or more credits" inserted after a one-year program and "or a program of 90 or more credits" inserted after a two-year program. This is a reasonable change since restructuring within the technical college system will put many programs on a credit basis. Item D was unchanged.

Subpart 5 was amended to include teaching experience in primary program content. That was necessary since many instructors will teach material within their program that has no direct relationship to the primary content of their program. To insure, for instance, that an instructor has recent experience in the field, only primary program content is reasonable to accept.

3700.0310 BOOKKEEPING CLERK LICENSE

Clerk was added to the bookkeeping license to make clear that this program is to teach bookkeeping clerks.

Subpart 1, Items A to C and D are unchanged. Item E eliminated personal finance and eliminated F, personal or individual income tax. It is unrealistic to expect an individual who is teaching bookkeeping clerk programs and has the type of experience as described in subpart 3 to have the knowledge and skills necessary to teach personal finance and personal or individual income tax. Therefore, it was reasonable to eliminate these two items.

In subpart 3, again the change in hours from "may" to "must" to assure that the applicant knows that there is no substitution. Recency must be part of the license application. Items A to C remain unchanged. Item D becomes accounts payable, receivable, and cost clerk. In order to assure that this clerk would have the necessary skills to teach bookkeeping as it appears in this curriculum, it was necessary to combine payable, receivable, and cost in order to have the breadth of knowledge required for this program. Therefore, E, accounts receivable clerk, L, billing clerk and M, cost clerk were eliminated. Alone they do not offer the experience required to teach this program and, therefore, it is reasonable.

Subpart 4, Item A is amended to read "with a major in any business field." Major was included since that is how a degree would read rather than in a specific field. In Items A, B and C the specific areas of study were changed to any business field. It is reasonable since all of the listings that come under the business field, accounting, bookkeeping, business administration, business education, have applicability to the content of this program. Item C also adds "a program of 45 or more credits" or "a program of 90 or more credits" to reflect the change within the technical college system of courses to credits. There is no change in the substance of Item C. Item D remains unchanged.

Subpart 5. Substitution for recent occupational experience. The first change in this is with the addition of primary program content for the reasons expressed in the previous license. The teaching can be in bookkeeping - it does not have to be in advanced level bookkeeping. The program deals primarily with bookkeeping and therefore this is a reasonable substitution.

3700.0315 BANKING AND FINANCE OPERATIONS LICENSE AND 3700.0320 BANKING AND FINANCE OPERATIONS/AGRICULTURAL LICENSE.

The changes in both of these licenses are only editorial.

Subpart 3 changes "may" to "must" so that the applicant will know that the 2000 hours of recency must be in the required field of occupational experience.

Subpart 4, A. Adds "with a major in" since that is how a bachelor's degree would be. A baccalaureate or bachelor's degree would be with a major rather than in a specific area of economics, management and finance, etc. Item C adds "or a program of 45 or more credits" and "or a program of 90 or more credits". This recognizes the restructuring that has occurred in

the technical college system. Since not all programs are restructured, an applicant has an option of one-year program or, if the program is restructured, defining the number of credits to equal a program.

Subpart 5. The teaching experience must be in primary program content. That is so the applicant will not be confused with teaching peripheral core knowledge which is common to many programs as being an acceptable substitute for recent occupational experience. It is reasonable to require the teaching experience to be in primary program content since it will substitute for recent occupational experience.

3700.0325 BUSINESS ADMINISTRATIVE MANAGEMENT LICENSE.

The title has been changed in this license to read "Business Office Management" license. It was confusing as to what was the purpose of the program since the purpose of the program is office management. It is reasonable to assume that office management is more descriptive of the actual program for which this license is written. The other changes within the license reflect either the change from administrative to office or the changes as indicated in the previous two licenses.

3700.0330 ADMINISTRATIVE SUPPORT LICENSE.

Subpart 1. Item A to F are unchanged. Item G has been changed to filing/indexing to represent the actual course offered within the core content of these programs. Item I has been changed from secretarial accounting to bookkeeping principles. Again this represents the actual course content offered. J, introduction to computer operations, has been changed to introduction to computers, again to represent the actual course titles. Therefore, these are reasonable changes. L has been added, records management. At the time that these rules were first promulgated, records management was not defined as a course which it now is. Therefore, it is a reasonable addition.

Subpart 3. Occupational experience requirement. Items E and F have been eliminated from appropriate occupational experience. Item E, correspondent specialist, is not a title that is commonly recognized in business and industry. Therefore, that title was eliminated. Item F, clerical data entry, was confused with data entry which is primarily a position in which an individual will enter data only. This experience is not adequate to teach the broad program of administrative support. Therefore, it was a logical deletion. In addition, if an individual actually did data entry and worked in the capacity of clerk typist, merely using the computer as the instrument, that individual would come under Item C.

Subpart 4, Item A. Business management has been changed to business administration/management to be sure that all appropriate majors were included and recognizes more clearly the intent. Therefore, it is a reasonable change. Items B and C changes the education to any secretarial field. This is

essentially the same since the previous license spelled out each and every secretarial field. By saying any secretarial field, we eliminate the possibility of overlooking a particular area. The other changes in this rule which deal with "may" to "must", primary program content, and number of credits are the same as in the previous licenses for the same reasons.

3700.0335 MEDICAL SECRETARIAL LICENSE.

Subpart 1. The items changed in subpart 1 reflect the changes in course titles as a result of restructuring. Item C, medical shorthand, is not a course offered within the medical secretarial program. Records management is a course now, and that has been included. Filing has been changed to filing/indexing, secretarial accounting is changed to the course title bookkeeping principles, introduction to computer operations is changed to introduction to computers. These changes reflect the actual courses offered within the program.

Subpart 3 lists the increase in hours of 2000 to 4000 as a medical secretary and defines more clearly for the applicant and the hiring authority the intent of no substitution for the experience as a medical secretary. Since the experience of being a medical secretary would be inclusive, whether it were a medical secretary or administrative medical secretary, Item A and B were eliminated which is reasonable. The increase to 4000 hours followed one year of implementation of these rules in which it was discovered the majority of applicants indeed had larger amounts of experience than was required by rule. In addition, since the emphasis of this program is on the medical aspect of secretarial work, it was felt the minimum of 4000 hours was a reasonable substitution. The remaining changes are the same as those that appeared in previous licenses. "May" to "must", the number of quarter hours expressed, and primary program content.

3700.0340 LEGAL SECRETARIAL OCCUPATIONS LICENSE.

Occupations has been eliminated from this language since it does not appear in any of the other rules as published. Again the changes in subpart 1, Items A through N relate primarily to program titles that have appeared since these rules were promulgated. J, filing changing to filing/indexing, K, secretarial accounting to bookkeeping principles, M, introduction to computer operations reading introduction to computers. There is not substantial change other than the wording which reflects the restructured course titles. The occupational experience reflects the same changes which occurred in medical secretarial. The legal secretarial experience is increased from 2000 to 4000 hours since applicants in the past year have all had in excess of 4000 hours. In addition, since the primary focus of this program is in the legal aspect of secretarial experience, it was felt that at least half of this experience should be in legal and, therefore, it is a reasonable requirement. In addition, the remaining hours may be in any secretarial field. The base of knowledge prior to the emphasis on legal will be in the secretarial skills. Therefore, its reasonable to allow

secretarial experience to qualify the applicant for a portion of the occupational experience. Therefore, legal stenographer and legal word processor were eliminated as experience.

Subpart 4. The changes in this subpart reflect the changes that occurred in subpart 3. Since there is 4000 hours minimal in legal secretarial, these substitutions then would be for the general secretarial experience. Therefore, the wording was changed to represent any secretarial field and is, therefore, a reasonable change. The other changes within this license are the same as those for the previous licenses which indicate "may" to "must", number of credits required, primary program content.

3700.0350 PURCHASING AND INVENTORY MANAGEMENT LICENSE; 3700.0360 COURT REPORTING LICENSE.

Both of these licenses have only the editorial changes reflected in other licenses which include changing "may" to "must", adding "with a major", adding "or a program of" and stipulating the number of credits required and the addition of primary program content.

3700.0365 PERSONNEL ASSISTANT LICENSE.

The crossover areas in this license have been eliminated in Item A, business math and machines, Item C, office management, Item D, office procedures, and Item E, filing. The purpose of removing these items of crossover is that an individual coming in as a personnel manager may not have the skills required to do general office procedures. In addition, personnel assistant was added in subpart 3 since the applicant may indeed have long experience as a personnel assistant and should have the skills, knowledge and attitudes required to teach in the personnel assistant program. Therefore, this appears to be a reasonable addition. Items A to F were changed to read "a personnel or human resources department", thereby eliminating the possibility of overlooking an area in personnel or human resources. All the Items A to F would be inclusive in that statement. This is, therefore, a reasonable change. The other changes within this license are the same as reflected in previous licenses.

3700.0370 COMPUTER PROGRAMMING.

The changes which occur in subpart 1, Items A through J reflect the restructuring that has occurred in the past year regarding course development and titles. D, microcomputer keyboarding and printing has been changed to microcomputer programming and operations. I, systems analysis and design has been added. These are, therefore, reasonable additions.

Subpart 3. Occupational experience requirement. In order to assure the intent of the rule that the experience be in mainframe or minicomputer environments, this was added to the license. The complex statement of computer related occupations, etc. has been eliminated. The experiences listed in Items A to F have been changed as follows: computer programming to

programmer; programmer or administrative data base to systems analyst; data base analyst to data base programmer; and F, systems programmer. These reflect titles rather than activities and they reflect titles commonly accepted within the industry. The other titles, those eliminated were more vague or ambiguous. Therefore, this is a reasonable modification.

Subpart 4, Item A was changed to read "a major in business administration, management information systems or computer science." Again, this was felt to be more all-encompassing rather than narrowing down and perhaps forgetting a particular area. B was modified in the same way. C changed from data processing to computer programming and this is reasonable since this is the focus of the program. D refers again to mainframe or minicomputer systems so as not to confuse the applicant that might be operating in a different arena. Therefore, this is a reasonable clarification. The other changes within this license pertain to the same changes made in previous licenses for the same reasons.

3700.0375 COMPUTER OPERATIONS LICENSE.

Subpart 1. May teach. Again the changes made in Items A through H are due to the changes in the titles of programs rather than change in the contents of the license. The changes are similar to what occurred in the previous license. C, microcomputer keyboarding and printing was changed to introduction to microcomputers. D, management information systems, processing management and supervision has been changed to job control language and H, systems analysis to computer literacy. The level the previous titles represented was too sophisticated for the level of experience required for the initial granting of this license and, therefore, the change is reasonable.

Subpart 3. In occupational experience again it is specified as mainframe or minicomputers since this is the area of study that is the program. The activities of occupation Items A through E are specified. B, data processing has been changed to read computer operations manager. C, lead computer operator was eliminated since that is a title that is not recognizable in business. D, management systems manager or operator was changed to read computer systems software support. Computer consultant or supervisor was changed to operations analyst. F, program or systems operator was eliminated as redundant in view of the modifications that were made. It is felt that the new titles are more clearly understood and recognized by business. Therefore, this is a reasonable substitution.

Subpart 4. Substitution for occupational experience. Items A, B, C and D have been changed in the same way that the previous license has been changed and for the same reasons. The only addition is operations. Since this is a computer operations license it is reasonable to include operations experience as an appropriate experience.

3700.0376 FINANCIAL AID ASSISTANT.

The only changes in this license were editorial. There are no content changes in accordance with previous licenses.

3700.0377 MICROCOMPUTER SUPPORT SPECIALIST.

Subpart 3. Occupational experience requirement. The change that occurred with installation of and troubleshooting computers, computer training in a business or industrial setting, or programming are reflected primarily in punctuation and placement in the sentence to provide more clarity to the applicant. The hours were changed from 2000 to 4000 and indicate that they must be in microcomputers since this is the focus of the program. Therefore, this is a reasonable change. The remaining experience, however, may be in a non-microcomputer environment in any of the areas previously mentioned. Since some of those activities would assist with a peripheral content of the program, this is a reasonable substitution. The recency experience, however, must be in microcomputer and since this relatively new in our industry this is reasonable. The other changes within this license are those that are primarily editorial and reflected in previous licenses.

3700.0378 ADVANCED BUSINESS TECHNOLOGY.

The changes in subpart 3 are editorial. The content remains the same. The other changes are the same that occurred in all the other licenses and are also editorial.

3700.0379 OFFICE INFORMATION PROCESSING SPECIALIST.

The changes in this license are editorial and reflected in the previous rules and for the same reasons.

3700.0355. The conversion chart has been repealed. Since the changes would all have been made in the past year it is no longer a necessary part of this format.