



Wisconsin Legislative Council

RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 22-005

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

2. Form, Style and Placement in Administrative Code

The treatment of s. PI 34.040 (2) (j) 3., currently SECTION 4 of the proposed rule, should precede other treatments, as it is numerically the first provision treated by the proposed rule. [s. 1.03 (1), Manual.]

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. The department may want to consider providing more detail in the “Summary of factual data and analytical methodologies” regarding the changes the proposed rule makes to the options for pathways to licensure as a speech-language pathologist. Under the current administrative code, there are four pathways to licensure; under the proposed rule, there are three. The current and proposed pathways are similar, but not identical, so it may be helpful to outline the differences between them.

b. Under proposed s. PI 34.0475 (2) (a) 2., the state superintendent may issue a license to teach as a speech-language pathologist to an applicant who “successfully met the assessment requirements in s. PI 34.021 (1) (c) and (d)”. The requirements under s. PI 34.021 (1) (c) and (d) are requirements that an educator preparation program must meet regarding assessments, not requirements individuals must meet for licensure. More specifically, s. PI 34.021 (1) (d) requires that an educator preparation program’s conceptual framework contain an assessment system that assesses students’ pedagogical knowledge. It is unclear how an individual might meet this requirement for purposes of the proposed rule. It is clearer how an individual would meet the requirements of s. PI 34.021 (1) (c), which lays out three options by which a student can demonstrate content knowledge for purposes of content knowledge assessment required to be included in an educator preparation program.