



Wisconsin Legislative Council

RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 23-063

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.]

4. Adequacy of References to Related Statutes, Rules and Forms

In SECTION 2 of the proposed rule, if the agency’s intent is to allow student teachers to take advantage of the new pathway to substitute teacher licensure created by 2021 Wisconsin Act 236 and found in s. 118.19 (7m) (b), Stats., the agency may want to consider changing the reference to s. PI 34.032, Wis. Adm. Code, to instead refer directly to s. 118.19 (7m) (b), Stats. The licensing framework in s. 118.19 (7m) (b), Stats., was designed for individuals who are enrolled in a teacher preparatory program and requires the agency to grant a substitute teacher license to an individual who meets all of the following criteria: (a) is at least 20 years of age; (b) is enrolled in a teacher preparatory program; (c) if that teacher preparatory program awards a bachelor’s degree, has successfully completed the minimum number of credits required to achieve junior level status; and (d) has completed at least 15 hours of classroom observation. On the contrary, the licensing framework in s. PI 34.032, Wis. Adm. Code, does not incorporate the new framework from s. 118.19 (7m) (b), Stats., and seems unlikely to be utilized by most individuals enrolled in a teacher preparation program as it requires an individual to hold an associate degree or higher and to have completed a substitute teacher training program. If the agency makes this change, it should also consider changing the reference to “short-term substitute teacher license” in the proposed rule to “substitute teacher license” to match the statutory language.

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

- a. Throughout the rule analysis, references to emergency rulemaking should be removed.
- b. The current administrative rule specifies that student teaching must be done for full days for a full semester. The part of SECTION 2 of the proposed rule that permits substitute teaching to count as student teaching also requires student teaching for full days for a full semester. However, the first part of SECTION 2 refers only to the length of the full term of student teaching and does not specify the length of individual days of student teaching. For consistency, the agency could consider specifying that student teaching for this option must also be for full days.

c. In SECTION 2 of the proposed rule, there is reference to a student meeting “completion requirements”. The agency could consider clarifying what this phrase means.

d. In SECTION 2 of the proposed rule, the reference to the teacher who must possess a short-term substitute teaching license could be clarified to refer to the student teacher, to clarify that it is the student teacher, not the cooperating teacher, who must possess a short-term substitute teaching license. Throughout the rest of s. PI 34.023 (2), Wis. Adm. Code, the student teacher is referred to as the student; the agency may want to consider using this same language in SECTION 2 of the proposed rule for clarity and consistency.