

Public Comment
Chapter 24:28 Educator Certification Administrative Rules

Educator Certification Exhibit 1

Date Submitted: 01/04/2017
Steve Benson

Although I totally support having a certification system that ensures that we have quality people in education positions, and allows us alternative ways to certify people in tough-to-find area; however, I question the thought process behind additional testing after an endorsed program has been completed. I recently graduated with a specialist degree which is endorsed and accepted by the DOE. These programs are expensive and time consuming but necessary to prepare myself for the job I currently hold. In looking at the proposed changes there would be an additional test needed to keep certification. Personally I feel that throws serious shade at the higher education entities in the state implying that what was taught is not sufficient. I would have no issue with incorporating the new rule into the degree work as part of the credits needed, but to add this after the fact does not seem right. To earn higher degrees we already test orally and do a written test to prove competence. I would also propose that those with a current degree, or enrolled currently in a program, be grandfathered in. I base this solely on the assumption that any additional test would be created with a significant amount of help from the higher education folks that administrated the degree work originally (same people that created and administered the test mentioned above). I would also like to see the proof that these extra tests make any difference to a program other than to check a box. I mean no disrespect by that comment. I just find it hard to accept if a person passes a test endorsed by the state (such as my specialist test) and the possibility exists to not pass an additional new test proposed, and thus, not be certified. We have enough trouble finding and recruiting new talent, I would hate to see this become so convoluted that it discourages people from pursuing this path.

Educator Certification Exhibit 2

Date Submitted: 01/06/2017
Christ McGregor

In the draft that is available on the state website - (<http://doe.sd.gov/board/documents/01192017PubHgDrft.pdf>) - it states: 24:28:17:13. Renewal requirements for standard teaching certificate. The applicant for a renewed standard teaching certificate shall: (1) Participate as a mentee in a state-approved mentor program for at least two of the past five years; (2) Complete national board certification or recertification within the past five years; or (3) Complete six education-related credits with a minimum of three transcribed credits or specialized learning experience hours. The remaining three credits shall include continuing education contact hours or transcribed credit hours. Should there be the word "or" placed after number 1? There is the word "or" in the following document: <http://doe.sd.gov/oatq/documents/1116-RulesComp.pdf> Does every teacher have to participate in a mentor program for two of every five years, or is this just one option for renewal?

Educator Certification Exhibit 3

Date Submitted: 01/06/2017

Terry Gerber, Educator

I'm not very excited about the proposed rule that requires aides and para-professionals to be "registered" with the state. We are talking about individuals that make, in most school districts, less than \$15,000/year. The turnover rate of this class of employee is incredible. We had to replace eleven para-professionals (46%) over the summer and have had four resign during this school year already. We've only been able to find replacements for three of these individuals. It's very challenging to fill para-professional positions as it is and am concerned this requirement will only add to the chaos. Districts document these individuals on our PRF reports that we submit to the state throughout the year. We are also required to do background checks on all employees, including para-professionals. What is the DOE hoping to gain by this requirement? This appears to me to be nothing more than a fund-raising effort by the DOE. I suspect we will need to "register" custodians and cooks next! Terry Gerber, Superintendent Canton School District

Educator Certification Exhibit 4

Date Submitted: 01/09/2017

Sara Robel

Reducing the credits needed for a lapsed certificate will be greatly beneficial for those teachers who have held current licenses out of state and are returning to South Dakota to teach.

Educator Certification Exhibit 5

Date Submitted: 01/09/2017

Matthew L Termansen

I am strongly in favor of these changes. I do not support the current option of having to take a Praxis for every discipline. I taught in Colorado where you have to take the PLACE test. This was a cumulative exam. When you passed this exam you were certified to teach all disciplines. I would like to see South Dakota implement this.

Educator Certification Exhibit 6

Date Submitted: 01/09/2017

Dr. Kari Oyen

SD Board of Education Certification Rules Pierre, SD RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. This addition is in line with all other

professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification> SDASP asks the SD Board of Education to consider revision of the renewal requirements as follows: 24:28:17:19. Renewal requirements for an education specialist certification. Education specialist certificates are valid for five years. Within the five-year validity period, applicants for renewed certification shall: 112 (1) Complete a minimum of one clock hour of suicide awareness and prevention training; (2) Adhere to the South Dakota Code of Professional Ethics for Teachers pursuant to chapter 24:08:03; and (3) Complete National Board of School Counselors or Nationally Certified School Psychologist certification or recertification during the previous five years or any combination of six education-related transcribed credits, specialized learning experience hours, or continuing education contact hours. Source: General Authority: SDCL 13-1-12.1, 13-42-3, 13-42-71. Law Implemented: SDCL 13-1-12.1, 13-42-1 to 13-42-4, inclusive, 13-42-71, 13-42-72, 13-43-5, 13-43-5.1. If you have further questions and/or want to speak to our association further, please contact me at kari.oyen@k12.sd.us. Thank you for your time and your service to our state. Dr. Kari Oyen, NCSP SDASP President

Educator Certification Exhibit 7

Date Submitted: 01/10/2017
Elizabeth McPherson

SD Board of Education Certification Rules Pierre, SD RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-

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Educator Certification Exhibit 8

Date Submitted: 01/10/2017

Sara Raue

SD Board of Education Certification Rules Pierre, SD RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification> SDASP asks the SD Board of Education to consider revision of the renewal requirements as follows: 24:28:17:19. Renewal requirements for an education specialist certification. Education specialist certificates are valid for five years. Within the five-year validity period, applicants for renewed certification shall: 112 (1) Complete a minimum of one clock hour (1) of suicide awareness and prevention training; (2) Adhere to the South Dakota Code of Professional Ethics for Teachers pursuant to chapter 24:08:03; and (3) Complete National Board of School Counselors or Nationally Certified School Psychologist certification or recertification during the previous five years or any combination of six education-related transcribed credits, specialized learning experience hours, or continuing education contact hours. Source: General Authority: SDCL 13-1-12.1, 13-42-3, 13-42-71. Law Implemented: SDCL

13-1-12.1, 13-42-1 to 13-42-4, inclusive, 13-42-71, 13-42-72, 13-43-5, 13-43-5.1. If you have further questions and/or want to speak to our association further, please contact our SDASP President, Dr. Kari Oyen at kari.oyen@k12.sd.us. Thank you for your time and your service to our state, Sara Raue Psy.S. NCSP School Psychologist BFS9-1/ BHSSC

Educator Certification Exhibit 9

Date Submitted: 01/10/2017

Kristi Kafka

SD Board of Education Certification Rules Pierre, SD RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION I hold the National Certification of School Psychology and have maintained that certification since earning it 11 years ago. It would be nice to be held to similar standards as other disciplines in our state and have the NCSP be recognized as a method to renew state certification as a school psychologist. Below is a letter for your consideration from my state association - South Dakota Association of School Psychologists. Thank you, Kristi Kafka, EdS, NCSP -----
----- The South Dakota Association of School Psychologists has reviewed the proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification> SDASP asks the SD Board of Education to consider revision of the renewal requirements as follows: 24:28:17:19. Renewal requirements for an education specialist certification. Education specialist certificates are valid for five years. Within the five-year validity period, applicants for renewed certification shall: 112 (1) Complete a minimum of one clock hour of suicide awareness and prevention training; (2) Adhere to the South Dakota Code of Professional Ethics for Teachers pursuant to chapter 24:08:03; and (3) Complete National Board of School Counselors or Nationally Certified School Psychologist certification or recertification during the previous five years or any combination of six education-related transcribed credits, specialized learning experience hours, or continuing education contact hours. Source: General Authority: SDCL 13-1-12.1, 13-42-3, 13-42-71. Law Implemented: SDCL 13-1-12.1, 13-42-1 to 13-42-4, inclusive, 13-42-71, 13-42-72, 13-43-5, 13-43-5.1. If you have further questions and/or want to speak to our association further, please contact our SDASP President, Dr. Kari Oyen at kari.oyen@k12.sd.us. Thank you for your time and your service to our state.

Educator Certification Exhibit 10

Date Submitted: 01/10/2017

Vicki Love

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Educator Certification Exhibit 11

Date Submitted: 01/10/2017

Michael Mettler

SD RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in

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Educator Certification Exhibit 12
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Date Submitted: 01/10/2017

Bridget Henrikson

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Educator Certification Exhibit 13
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Date Submitted: 01/11/2017

Ted Williams

RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists (SDASP) has reviewed that proposed rules for certification and recertification of education specialists in South Dakota. SDASP, as an organization, asks that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. The NCSP certification initially requires that applicant pass a national examination and present credentials to show they have received training that meets national standards. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. These NSCSP standards are equivalent or even more stringent than the state re-certification standards. (For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification>) As a long-time school psychologist, I have always submitted my NCSP recertification forms to DOE when applying for my state certification and these have always been accepted as proof of meeting state standards. I feel it is time to formally make that connection with NCSP when renewing for state school psychologist certification.

Educator Certification Exhibit 14

Date Submitted: 01/11/2017

Marsha Leininger

Comment: RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a nationally certified school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification> SDASP asks the SD Board of Education to consider revision of the renewal requirements as follows: 24:28:17:19. Renewal requirements for an education specialist certification. Education specialist certificates are valid for five years. Within the five-year validity period, applicants for renewed certification shall: 112 (1) Complete a minimum of one clock hour of suicide awareness and prevention training; (2) Adhere to the South Dakota Code of Professional Ethics for Teachers pursuant to chapter 24:08:03; and (3) Complete National Board of School Counselors or Nationally Certified School Psychologist certification or recertification during the previous five years or any combination of six education-related transcribed credits, specialized learning experience hours, or continuing education contact hours. Source: General Authority: SDCL 13-1-12.1, 13-42-3, 13-42-71. Law Implemented: SDCL 13-1-12.1, 13-42-1 to 13-42-4, inclusive, 13-42-71, 13-42-72, 13-43-5, 13-43-5.1. If you have further questions and/or want to speak to our association further, please feel free to contact me, or contact our SDASP President, Dr. Kari Oyen at kari.oyen@k12.sd.us. Thank you for your time and your service to our state. Sincerely, Marsha Leininger, NCSP

Educator Certification Exhibit 15

Date Submitted: 01/11/2017

Robyn Dattilo

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Educator Certification Exhibit 16
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Date Submitted: 01/11/2017

Alyssa Larson

SD Board of Education Certification Rules Pierre, SD RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-

approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification> SDASP asks the SD Board of Education to consider revision of the renewal requirements as follows: 24:28:17:19. Renewal requirements for an education specialist certification. Education specialist certificates are valid for five years. Within the five-year validity period, applicants for renewed certification shall: 112 (1) Complete a minimum of one clock hour of suicide awareness and prevention training; (2) Adhere to the South Dakota Code of Professional Ethics for Teachers pursuant to chapter 24:08:03; and (3) Complete National Board of School Counselors or Nationally Certified School Psychologist certification or recertification during the previous five years or any combination of six education-related transcribed credits, specialized learning experience hours, or continuing education contact hours. Source: General Authority: SDCL 13-1-12.1, 13-42-3, 13-42-71. Law Implemented: SDCL 13-1-12.1, 13-42-1 to 13-42-4, inclusive, 13-42-71, 13-42-72, 13-43-5, 13-43-5.1. If you have further questions and/or want to speak to our association further, please contact our SDASP President, Dr. Kari Oyen at kari.oyen@k12.sd.us. Thank you for your time and your service to our state.

Educator Certification Exhibit 17

Date Submitted: 01/11/2017
Penny McCormick-Gilles

I was impressed by the changes in the new certification rules until I reached the RECERTIFICATION changes. I am pleased that teachers can use their national certification as a means to renew their certification and I would imagine that when putting this together you did not realize that School Psychologists can also earn National Certification. I am one of those who did the extra work and took a praxis test in order to earn my NCSP and would like the same benefit that is given to other professionals in education. Please take the time to add this statement to the document The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. Thank you for your time, Penny McCormick-Gilles, MEd, NCSP For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification>

Educator Certification Exhibit 18

Date Submitted: 01/11/2017
Angela Christensen

SD Board of Education Certification Rules Pierre, SD RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an

organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification> SDASP asks the SD Board of Education to consider revision of the renewal requirements as follows: 24:28:17:19. Renewal requirements for an education specialist certification. Education specialist certificates are valid for five years. Within the five-year validity period, applicants for renewed certification shall: 112 (1) Complete a minimum of one clock hour of suicide awareness and prevention training; (2) Adhere to the South Dakota Code of Professional Ethics for Teachers pursuant to chapter 24:08:03; and (3) Complete National Board of School Counselors or Nationally Certified School Psychologist certification or recertification during the previous five years or any combination of six education-related transcribed credits, specialized learning experience hours, or continuing education contact hours. Source: General Authority: SDCL 13-1-12.1, 13-42-3, 13-42-71. Law Implemented: SDCL 13-1-12.1, 13-42-1 to 13-42-4, inclusive, 13-42-71, 13-42-72, 13-43-5, 13-43-5.1. If you have further questions and/or want to speak to our association further, please contact our SDASP President, Dr. Kari Oyen at kari.oyen@k12.sd.us. Thank you for your time and your service to our state.

Educator Certification Exhibit 19
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Date Submitted: 01/12/2017

Ruth Fodness

SD Board of Education Certification Rules Pierre, SD RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION As a school psychologist in South Dakota, I have reviewed the proposed rules for certification and re-certification of education specialists in South Dakota. I feel that it is important that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the Nationally Certified School Psychologist (NCSP) credentialing process: The NCSP credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. I have maintained my NCSP certification since 1989. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to National Association of School Psychologists (NASP) members as well as to nonmembers.

Maintaining the NCSP demonstrates continued professional excellence with continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or American Psychological Association (APA) -approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification> I would like the SD Board of Education to consider revising the renewal requirements as follows: 24:28:17:19. Renewal requirements for an education specialist certification. Education specialist certificates are valid for five years. Within the five-year validity period, applicants for renewed certification shall: 112 (1) Complete a minimum of one clock hour of suicide awareness and prevention training; (2) Adhere to the South Dakota Code of Professional Ethics for Teachers pursuant to chapter 24:08:03; and (3) Complete National Board of School Counselors or Nationally Certified School Psychologist certification or recertification during the previous five years or any combination of six education-related transcribed credits, specialized learning experience hours, or continuing education contact hours. Source: General Authority: SDCL 13-1-12.1, 13-42-3, 13-42-71. Law Implemented: SDCL 13-1-12.1, 13-42-1 to 13-42-4, inclusive, 13-42-71, 13-42-72, 13-43-5, 13-43-5.1. I would be happy to answer any additional questions. Thank you for your time. Sincerely, Ruth Fodness, S.Psy.S., NCSP Certified School Psychologist

Educator Certification Exhibit 20

Date Submitted: 01/12/2017

Alicia A. Peterson

RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit: <https://www.nasponline.org/standards-and-certification/national-certification> SDASP asks the SD Board of Education to consider revision of the renewal requirements as follows: 24:28:17:19. Renewal requirements for an education specialist certification. Education specialist certificates are valid for five years. Within the five-year validity period, applicants for renewed certification shall: 112 (1) Complete a minimum of one clock hour of suicide awareness and prevention training; (2) Adhere to the South Dakota Code of Professional Ethics for Teachers pursuant to chapter 24:08:03; and (3) Complete National Board of School Counselors or Nationally Certified School Psychologist certification or recertification during the previous five years or any combination of six education-related transcribed

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Educator Certification Exhibit 21
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Date Submitted: 01/12/2017

John P. Larson

RE: RENEWAL REQUIREMENTS FOR AN EDUCATION SPECIALIST CERTIFICATION The South Dakota Association of School Psychologists has reviewed that proposed rules for certification and re-certification of education specialists in South Dakota. We, as an organization, ask that the rules reflect the addition of our national certification as part of the initial and renewal requirement for an education specialist certificate. As a school psychologist in this state, I also support this revision. This addition is in line with all other professions highlighted in the rules and reflects rigorous continuing education requirements and high standards of practice. Below is a description of the NCSP credentialing process: The Nationally Certified School Psychologist (NCSP) credential recognizes school psychologists who meet rigorous national standards for graduate preparation and continuing professional development. Many states (including South Dakota) and school districts accept or align their credentialing requirements with the NCSP, and some offer additional employment benefits for achieving highly qualified professional status. The NCSP is administered by the National School Psychology Certification System (NSPCS; established by the National Association of School Psychologists) and is open to NASP members as well as to nonmembers. Maintaining the NCSP demonstrates continued professional excellence through continuing professional development (CPD). NCSPs must obtain 75 hours of CPD every three years, with 10 hours coming from NASP- or APA-approved providers, and with 3 hours in the category of ethics or legal regulation in school psychology. For more information, please visit:

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Educator Certification Exhibit 22

Date Submitted: 01/18/2017

Marilyn Circle Eagle

Agrees with rules for Eminent Scholar Lakota, Dakota, Nakota language and culture permit.

Educator Certification Exhibit 23

Date Submitted: 01/18/2017

Marsha Leininger

As Special Education Director for Custer Schools, I very much support the certification rule changes as relate to special education. I particularly appreciate the early childhood special education preparation rule change. I also support the proposed single K-12 Special Education certification, as well as the proposed Alternate Certification rules. I believe these changes will remove some existing barriers and help small, rural districts in locating and employing highly qualified staff in the special education field.

Educator Certification Exhibit 24

Date Submitted: 01/18/2017

Matthew Lagerstrom

Dear Members of the Board, I am currently a teacher at Grant-Deuel School in Reville. I have been watching the proposed rule changes to teacher certification, and for the most part, I support what you are trying to do. The Praxis Test is a good option to demonstrate "mastery", but I am glad that you are proposing to provide the alternate route of college course-work with a defined number of credits and GPA cut-off. Please continue with that proposal. I read an article in the Argus Leader which discussed the idea of Elementary Teachers being able to "qualify" for teaching Secondary-level courses. My school has first-hand experience with this, and I feel that the option of allowing elementary-trained teachers to "test-up" should be an option. While the preparation work for either grade-band is different, without this ability to "test-up" our school would be severely hurting for finding qualified teachers to fill the needs of our small district. Please do not restrict who can "qualify" to teach. Lastly, I finally completed my Master's Degree in Education this last December under the understanding that it would offer me a 10-year certificate as a reward for the additional \$25,000 that I spent in pursuing personal improvement and life-long learning. In South Dakota, a Master's Degree does not mean a significant pay-raise. For my local condition, it translates into a \$2000 to \$3000 per year bump, which exclusive of the time that I spent working on it means that I will spend the next eight to twelve years "paying it off", never mind the money that is lost to taxes and paying the student loans which I took out to pursue the degree. I consider the elimination of the 10-year certificate as a negative move. First, because it removes the incentive to pursue a Master's Degree in education. Second, because it makes the statement that a Bachelor's Degree is equivalent to a Master's Degree in educational status. I strongly feel that removing the ten-year certificate will have negative consequences on the overall state of teaching. Please do not remove it as an option. The current system with a one-time ten-year certificate acts as a neat reward and says to teachers that they did something special. I do appreciate your time in reading this and look forward to watching how the process continues. Sincerely, Matt Lagerstrom Science Teacher Grant-Deuel School

Educator Certification Exhibit 25

Date Submitted: 01/19/2017

Carol Risse

I have taught in South Dakota for 33 years. As I listen to the new teachers coming out of college I hear a lot of complaints about the Praxis Testing. Is it really necessary? I'd say no. I'm getting at least 2 announcements of teacher openings weekly that we still have in our state. The Praxis makes it even harder for new people to get into teaching. It is just a test and we all know what tests tell us, not much. The best thing you can do for new teachers is get them in the classroom with a good mentor program to guide them. All the education classes hardly prepared me for that first year. Yes, they gave me some ideas, but the true learning happened when I faced my actual first classes. Now, I do not think that we should throw out all the guidelines for our teacher education programs. But, if they have passed all the college required classes with an appointed GPA; I don't think the Praxis is going to tell me a whole lot more about if they'll make a good teacher or not.

Educator Certification Exhibit 26

Date Submitted: 01/19/2017

Rosemary Buchman

The proposed Arts Educator Permits negate the very idea of certification in the first place. Placing an untrained individual in a classroom is equivalent to throwing them to the wolves. They may know content, but what do they know of classroom management, discipline or procedures required to run a room full of youngsters? What wording in the proposal guarantees districts will genuinely try to hire a truly certified teacher before hiring a "permit?" What wording clarifies what these folks will be paid? If they are paid equal or greater to a first year teacher in any district, how is that equitable? SDEA will be overrun dealing with grievances about salary. The idea to encourage Arts Permits to pursue their full certification while teaching is ridiculous as well. These are not degrees you can get thru online coursework. These folks will likely be placed in rural isolated schools in our state. They will not be located within a reasonable distance to universities to take classes while teaching. The job is too demanding to make that easy for a veteran teacher much less a beginner. Small districts require some of us to be the entire arts department and often teach another subject as well.. We have no coworkers in our fields of expertise. We have no mentors in our buildings to help. We are on our own. It makes more sense to address the real problem as to why positions are unfilled: Low teacher pay and undervaluation of the profession in general. Hiring "stand ins" will only hurt South Dakota's public education.

Educator Certification Exhibit 27

Date Submitted: 01/19/2017

Jeff Danielsen

I have spoken to both the Mitchell Superintendent's group and Southeast Superintendent's group about the proposed changes. Here are a few observations made by the groups about the proposed certification rules. 1. Address the elementary endorsement with the difference between K-4 and 5-6th in particular. Don't set up a system that means schools will have to find different endorsements at the different grade levels of an elementary school. 2. Concern for the Para-educator Permit and what the cost will be, how it will be implemented, etc. Will it be cumbersome for schools and the para's? 3. There are concerns about the alternative certification process and that we continue to water down the education profession. We want to make sure that not just anybody can get a teacher or administrator certificate. 4. There was no support for the Standard and Professional teacher certificates with the feeling that they were unnecessary. Thanks for your consideration. Dr. Jeff Danielsen Superintendent West Central School District 49-7

Educator Certification Exhibit 28

Date Submitted: 01/26/2017

Jennifer Lowery

1. I am concerned with the concept of creating permits for paraprofessionals. Paraprofessionals are a difficult position for my district to find, retain, and hire. I believe the permit process, while positively intended, would create an additional cumbersome step in the hiring process. For a paraprofessional to work with students, he or she must pass a background check by state law. In my district, the recommending administrator must have three reference calls made prior to recommending hire. I urge the State Board of Education to not support a paraprofessional permit. 2. I am concerned with a standard teaching certificate compared to a professional teaching certificate. When I began teaching, I had a four year teaching degree from Dakota Wesleyan University and a master's degree in psychometrics from the University of Nebraska. I considered myself a professional and took pride in entering the education profession. I strongly believe I was a professional educator on day 1 of teaching; therefore, a person should be able to obtain a professional teaching certificate. Time elapse is a concept, but there is no magic that turns someone into a professional after five years. If a designation needs to be made in certification, perhaps a standard teaching certificate should go to anyone who obtained certification through an alternative pathway. A professional certificate would go to a person who has a degree in education and his or her field of study. 3. This is just a general statement of caution. Please do not lower the certification requirements to the point that a teaching degree has no meaning. I take great pride in the work, dedication, and study it took for me to climb the educational ladder including being a master teacher. I feel like we are diminishing our own profession by saying anyone can teach. If we need someone to teach math in (District A), higher someone to teach math and just admit they are not highly qualified. If we continue to hide the struggles to find high quality practitioners, we will continue to complain about money and quality teachers without the data to support our concern.

Educator Certification Exhibit 29

Date Submitted: 01/26/2017

Becky Dorman

Regarding International teacher educator permit: You have developed a proposed rule that will work very well for international educators.

Educator Certification Exhibit 30

Date Submitted: 02/08/2017

Dawn Wirth

On page 56 of the new rules the new paraprofessional permit requirements are explained. The requirements are not concerning to me but the permit itself seems to be another hoop for people to jump through to determine they are qualified and safe for schools to have in the system. Schools already do fingerprinting on everyone who works in the system. This background check would assure the students safety. Schools already have a hard time finding candidates who are qualified for these positions. They are the lowest paid people who have the most challenging jobs. Putting one more hurdle for them to jump through seems like another barrier to getting people in place. I have had a position open since before Christmas and have no applicants so I feel like this para permit will put districts in a more challenging position to find candidates.

Educator Certification Exhibit 31

Date Submitted: 02/10/2017

Kirk Easton

I do not agree with the proposed certification for para-professionals. We have a hard enough time now hiring for these positions, and another layer will just make it more difficult.

Educator Certification Exhibit 32

Date Submitted: 02/13/2017

Gayle Bortnem

Why do those at the ELED level have to take the Praxis Content exam to show competence in math, language arts, science, and social studies when course work is sufficient for Sec Ed majors and they do not have to take a Praxis to show competence? This is not equal or fair. Also, this is an expensive test and is not a reliable indicator that the elementary education student will be a competent teacher. The only one that benefits from requiring this standardized test is the test company (ETS). Possible scenario- a student is given 4 years of instruction and real life classroom experiences and then a test on content (which may or may not be related to their teaching) stops their entrance into student teaching and even delays graduation. A student or parent that has paid for this would be upset that the test is saying that my education was not relevant! Another question, How do the universities teach to a content test that no one really knows what specific areas are required (ETS will not give that information?) Social studies is an example that is the most difficult part of the test, but yet a college elementary student might take one history, government and geography class and then be expected to have a vast knowledge of 1

specific area for this test. Also, in many elementary classrooms, it is common knowledge that this area of curriculum is delegated to an average of an hour per week. The point being Elementary majors are "generalists" and must have knowledge of many different areas of learning. They also get extensive understanding/instruction of the needs of the students and how to teach (pedagogy). The test to emphasize should be the teaching and learning praxis and not the content!

Educator Certification Exhibit 33

Date Submitted: 02/14/2017

Robin Weibers

Comment on 24:28:27:06 Mentor teacher endorsement. Through the PDC Induction and Mentoring Program at USD, mentors take 6 hours of mentor training: 3 hours related to induction of new teachers (EDFN 755), and 3 hours pertaining to mentoring of new teachers (EDFN 775). I am asking the board to consider allowing the 6 hours of graduate level mentoring and induction coursework through the PDC Induction and Mentoring Program to be accepted as state-designated coursework in order for the mentor participants to receive the Mentor teacher endorsement.

Educator Certification Exhibit 34

Date Submitted: 02/20/2017

Karen Kindle

In thinking about the proposed changes to the Reading endorsement, we had a question. USD's reading program has national recognition from the ILA. Part of that recognition hinges on our use of the PRAXIS 5301 Reading Specialist content exam, used in many states. Would it be possible to add that to the content exams recognized by the state for the reading endorsement as most of our students are working on a master's degree and this content exam is more consistent with the ILA standards than the Teaching of Reading exam. It is difficult for us to require the exam for our students without it being on the state's approved list.

I am happy to provide any information that would be helpful.

Thank you,

Karen Kindle
University of South Dakota
karen.kindle@usd.edu
605-677-5805

Educator Certification Exhibit 35

Valerie Johnson

Thank you for having this posted online and for all the work you do. I let my certificate (K-12 music) lapse when we lived in TX. We moved back to SD in 2008 (Yes!) I obtained a one year certificate last year so that I could teach and work on my credits toward a regular certificate. I think I understand, in the new rules, that there will be no requirement for continuing ed. credits - is that so? Also, there will be a requirement for a state assessment - correct? If so, what test do we use?

Educator Certification Exhibit 36

Date Submitted: 03/07/2017

Lori Wehlander

As the Director of Special Services at the Huron School District I am very concerned with the requirements for paraprofessionals and other educator permits in the new certification rules. At the present time it is often hard to fill the openings we have for paraprofessionals. I feel that the new certification rules will be a barrier in the future. This is a population that is often in financial need and placing another cost on them is not beneficial. Currently all employees must have fingerprints done and past recommendations from references and employees are considered. This permit will place another barrier on employment. I do believe the new certification rules for Special Education Teachers are appropriate and will benefit all programs. The concern I have is directly related to the Paraprofessional permits.

Educator Certification Exhibit 37

Date Submitted: 03/08/2017

Amy Pierson

24:28:06 Length of Certificate. I am against the removal of the 10-year certificate for an advanced degree or National Board Certification. Other than the personal gratification of furthering one's education level, there is not much incentive to pursue an advanced degree if you are a SD educator. Most school district's pay scales compensate only about an extra \$1,000 for a Master's degree. The one time only 10-year certificate is a small, but much appreciated incentive for pursuing an advanced degree.

Educator Certification Exhibit 38

Date Submitted: 03/13/2017

Tamra Hummel

We have a tough time getting para-educators. They don't get paid much, and have tough jobs! I feel that we should encourage but not require more certification. Dr. Tamra Hummel Dakota Valley Elementary School Principal

Educator Certification Exhibit 39

Date Submitted: 03/14/2017

Dean Kueter

Dear State Board of Education Members: We are representing the Cornbelt Educational Cooperative and its nine member school districts. We would like to take this opportunity to provide comments on the proposed Educator Certification Administrative Rules. An area of specific concern is the proposed "Paraprofessional Permitting" requirement. Recruiting and retaining paraprofessionals for the cooperative as well as for our member districts continues to be an enormous challenge with the requirements that we already have in place. Those current requirements are to be qualified in one of three ways: 1) Earning an Associate's Degree or higher; 2) Earning a minimum of 48 college credits; or 3) Passing the designated ParaPro state test. We can personally tell you that not everyone we could potentially hire is able to pass this competency test. More information on these requirements can be found at <http://doe.sd.gov/oatq/paraprocert.aspx>. In addition to the above requirements, the cooperative and member districts are required to conduct background checks on all employees. We would be interested to know where the idea for this need for Paraprofessional Permitting has come from. As we listened to the January 19th State Board of Education meeting testimony, it was stated that portability between school districts was a concern. Is this a widespread concern or an isolated incident? The statements made were that the concerns were more ethical in nature and not necessarily criminal activity. Our major concern is not the \$25 cost for the permit. Most districts already pay the \$55 for the paraprofessional to take the ParaPro test. We just look at this proposed requirement as one more barrier to overcome before we can get staff working with children with exceptional needs. In most cases, if we are offering a potential paraprofessional a job, we needed them working directly with children days, if not weeks ago. Would this permit need to be submitted and approved by the Department of Education prior to a paraprofessional working with children? Another question is who will monitor and handle complaints and revocation of paraprofessional permits? On January 19th there was talk, but no clear answer, on it being monitored by the Professional Teachers and Standards Practices Commission. As we are sure you all know South Dakota has a low unemployment rate and workforce challenges. These proposed rules would put additional requirements on some of the lowest paid staff members who are employed in the hardest to fill positions. The South Dakota Board of Education needs to make sure that rules you adopt make sense and meet the needs of South Dakota schools, not some other state or area of the country. This presents districts with one more obstacle before we can provide services to children with high needs. Thank you for serving on the South Dakota Board of Education and for taking our input into consideration. /S/: Dean Kueter, Director - Cornbelt Educational Cooperative, Jason Bailey, Superintendent – Bridgewater-Emery School District, Larry Nebelsick, Superintendent – Canistota School District, Donald Hotchkiss, Superintendent – Freeman School District, James Bridge, Superintendent – Hanson School District, E. David Colberg, Superintendent – Marion School District, Dr. Daniel Swartos, Superintendent – McCook Central School District, Lonny

Johnson, Superintendent – Montrose School District, Dr. Donovan DeBoer, Superintendent – Parker School District, and Dr. Jennifer N. Lowery, Superintendent – Tea Area School District.

Educator Certification Exhibit 40
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Date Submitted: 03/17/2017

Coleen Keffeler

Written Testimony for the State Board of Education in Regard to Amendment #10: Decrease Coursework Requirements for CTE Alternative Certification

As a career and technical education (CTE) instructor in South Dakota for the past 32 years, I am writing in support of Amendment #10. Having worked with several CTE teachers with alternative certification, I can attest to the importance of this amendment.

Many people utilizing the alternative certification are bringing a wealth of practical, CTE-specific knowledge to the classroom. The skills/knowledge these individuals seek to utilize in creating successful classroom curriculum are based on practical skill applications, such as developing lessons/activities to meet the course standards, creating formative and summative assessments, evaluating data from assessments to make improvements to the CTE coursework, setting realistic classroom expectations, and interacting with students and parents. While theory courses may provide a basic level of education expectations and understanding adolescent behavior, the practical coursework is essential for a successful, meaningful program for business/industry professionals entering any CTE classroom.

Other important factors to take into consideration include cost, location, and timing of the offering of required coursework. Many business/industry professionals are taking a substantial cut in pay and benefits to give back to the profession by teaching the next generation. If the cost, location, and timing of the required credits is viewed as excessive or difficult to obtain, South Dakota will lose the valuable knowledge and skills of these individuals. It is imperative that South Dakota post-secondary institutions, current administrators and CTE professionals work with business/industry individuals seeking alternative certification by offering practical, relevant, timely, and cost-effective credits.

Coleen C. Keffeler
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Educator Certification Exhibit 41

Date Submitted: 03/17/2017

Deb Soholt on behalf of Jolene's Law Task Force

Dear State Board of Education:

On behalf of the 2016 Jolene's Law Task Force, I respectfully submit the following comment relating to the proposed certification rules package.

We strongly support the proposed rules creating paraprofessional certification. These are individuals who work daily in very close proximity with students in small groups and one-on-one settings, where they may be the only adult present. This sets them apart from other non-teachers in a school setting as they maintain close contact and have a large impact on the education of students, including some of our most vulnerable student groups.

Paraprofessionals are often assigned in districts to work with students who are most at risk - special education students, students in poverty, students struggling to learn English - in essence, the most vulnerable parts of the state's population. We expect much of teachers working with these students and have established clear ethical guidelines that address appropriate behavior. As such, we firmly believe that these professionals should be held to the same professional conduct and ethical standards as other educators in the state.

This mirrors our expectations in the taskforce plan that these individuals should be considered mandatory reporters and should be supported in the same manner as other educators when it comes to recognizing signs of abuse and receiving training to help address concerns of child abuse.

The safety of our children is paramount, and we feel that the proposed rules help ensure this. Currently, statute requires only a background check at the time an individual is hired. The list of convictions that would make someone un-hirable is certainly important, but does not cover everything that should be of concern when determining whether someone is safe to be working so closely with our children. Not all infractions that would make a teacher ineligible to teach are necessarily "reported crimes" or necessarily result in conviction. Every time a teacher applies for certification or re-certification, the department administers a conduct and fitness review to screen for evidence of behaviors that may indicate there are safety concerns. This means that at least every 5 years, some sort of conduct check is occurring. Asking paraprofessionals to follow this same process allows for this regular check and ensures that the same sort of infractions that would cause us to decide a teacher is ineligible to be trusted with the responsibility of maintaining close, personal contact with children would also apply to paraprofessionals.

Furthermore, when a teacher holds a certificate and an ethical violation occurs, the state has the ability to take action against that certification by revoking, suspending, or denying recertification. This prevents teachers from simply moving to another district if there are concerns. The same is not true for paraprofessionals, and the state has no ability to investigate or take action should complaints be received. Given the fact that there have been several cases in the last five years where paraprofessionals in the state have been found to have had inappropriate sexual relationships with students, we feel it is important that there be a mechanism for the same investigation and potential action against certification to happen for paraprofessionals.

In sum, we support these rules as they would hold paraprofessionals to the same ethical standards as teachers, and would allow for the same due process via hearing in front of the Professional Practices and Standards Commission should the need arise.

Respectfully,

Deb Soholt

Senator Deb Soholt, District 14 Chair,
Jolene's Law Task Force