# UEN Comments Regarding Administrative Rules

# BOEE: Special Education K-12 Credential, International Teachers, Reciprocity and OthersDecember 8, 2022

Thank you to the members of the Legislative Administrative Rules Review Committee for considering the Iowa Board of Educational Examiners proposed administrative rules. These rules address and expand flexibility in meeting the staffing and educational needs of school districts as we collectively struggle with teacher and counselor shortages likely to continue for years, if not indefinitely. Additionally, [ARC 6678C](https://www.legis.iowa.gov/docs/aco/arc/6678C.pdf), proposals to implement the new position of Work-based Learning Program Supervisor and Content Specialist Authorization, provide for the necessary steps toward credentialing, and we have no concerns about these proposals.

The Urban Education Network, comprised of 23 Iowa public school districts educating over 40% of the students in Iowa, provides the following comments regarding the subject proposed rules indicating our complete support:

[ARC 6677C](https://www.legis.iowa.gov/docs/aco/arc/6677C.pdf) Notice of Rules Change to IAC 282 Chapter 13 Issuance of Teacher Licenses and Endorsements, Chapter 18 Administrators and Chapter 27 Professional Service Licenses. The proposed rulemaking implements updated language for reciprocity laws pursuant to SF 2383 enacted in the 2022 Session.

UEN has advocated for simplified licensure reciprocity with other states for many years. We supported the subject legislation and supported the rules as proposed here by BOEE. We are grateful to see in the proposal clear provisions for documentation of licensure in good standing, requirement to pass a licensure exam in another state if that is the origin state’s requirements, verification of no pending disciplinary proceedings in any state or country, and application and fee requirements the same as any teacher licensed in Iowa. Especially in recruiting a diverse teaching workforce, being able to make an offer and hire teachers as they graduate with their other state credential, but before working for a year and establishing roots and connections in the other state, will be very beneficial to Iowa school districts.

[ARC 6679C](https://www.legis.iowa.gov/docs/aco/arc/6679C.pdf) Notice of Rules Change to IAC 282 Chapter 14 Special Education. The proposed rulemaking will create an optional K-12 Special Education – All endorsement.

UEN has included language in our legislative platform for several years, asking for the special education generalist (K-12) credential. Even large urban districts are increasingly challenged to staff the programs and services for special education students with increasing shortages. Currently, with a shortage of teachers credentialed in special education at all levels, having the option to assign a staff member with a generalist credential creates capacity to move other credentialled staff into the classes aligned with their credential, which maximizes our districts’ abilities to have teachers assigned to classrooms appropriately. We appreciate that this credential does not replace the others, leaving school boards the option to require a license more specific to grade levels if necessary. We also value this opportunity to support our current staff, already committed to our urban school districts and communities, toward this generalist special education credential, which will help us address the needs of our students requiring special education services.

[ARC 6680C](https://www.legis.iowa.gov/docs/aco/arc/6680C.pdf) Notice of Rules Change to IAC 282 Chapter 13 Out-of-country applicants. The proposed rulemaking would allow out-of-country applicants to be exempt from PRAXIS testing if they hold a license in another country or if their transcripts show completion of a teacher preparation degree.

Although our UEN member school districts enroll just over 40% of students in Iowa, we educate 70% of students requiring English Learner supports. Our districts have many educated and talented adults from around the world living in our UEN communities, some of whom were successful teachers in their prior countries before coming to Iowa. This additional flexibility aligns with recent policy changes made by the Iowa Legislature and makes good sense in helping to address the teacher shortage. Especially for teachers of world languages, the challenge of passing the PRAXIS when it’s given in the teacher’s second language proves an unnecessary barrier to licensure of committed and qualified teachers. UEN enthusiastically supports this proposal, which also helps urban districts work toward their goal of a more diverse teaching staff.

[ARC 6680C](https://www.legis.iowa.gov/docs/aco/arc/6680C.pdf) Notice of Rules Change to IAC 282 Chapter 22 and 27 Content Specialist Authorization. The proposed rulemaking would allow candidates with a masters’ degree or higher to obtain a content specialist authorization.

UEN supports this proposed rule for all of the same reasons listed above to address educator shortages across the state. Urban school leaders fully acknowledge that additional flexibility requires a commitment from principals, mentor teachers and other staff to support newly credentialled educators as they build the skill set and expertise to meet student needs.

At the Nov. 16 UEN Steering Committee meeting, members unanimously approved the following legislative priority which encourages us to support the flexibility accomplished through administrative rules proposals such as these noticed above.

**Teacher, Administrator, Staff Shortage**
Adequate funding is essential for public schools to compete with the private sector in hiring new and retaining experienced employees. Recent steps to simplify licensure reciprocity with other states and eliminate IPERS barriers to rehiring retirees are welcome relief, but insufficient to eliminate staff shortages urban schools experience today. New policies should be implemented to help schools meet the challenge of attracting and retaining tomorrow’s educators and recruiting teachers that mirror our diverse students. UEN supports flexibility in certification requirements such as a K-12 special education credential, minimizing barriers for educators with international experience to teach in our schools, additional teacher intern programs that include adequate pedagogy/on-the-job classroom exposure, and continued support for grow-your-own programs, para and teacher apprenticeships, tuition support and loan forgiveness programs. Iowa’s Future Ready Workforce efforts should include an educator focus to replenish the talent pool and attract high school and college students to a career in education. UEN supported last year’s discussion in the Iowa Senate to use the Management Fund for loan forgiveness and recruitment programs. Of critical importance is the dedication of state and local leaders to generate enthusiasm for teaching by speaking about and treating educators with the respect the profession deserves and keeping great Iowa teachers in classrooms in Iowa.

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