

Mike DeWine, Governor
Paolo DeMaria, Superintendent of Public Instruction

DATE: January 8, 2020
TO: Representative Scott Wiggam
FROM: Paolo DeMaria, Superintendent of Public Instruction
SUBJECT: Occupational Licensing Review Recommendations

Thank you for the opportunity to review recommendations from the House State and Local Government Committee related to licenses issued by the State Board of Education. We appreciate the committee's thoughtful attention to its statutory duty to regularly review occupational licensing boards and its consideration of the role the State Board of Education plays in licensing those who work in our schools.

OVERVIEW

As a licensing body, the State Board of Education believes licensing serves two important purposes within the education system. First, teachers and other staff within Ohio's schools are the most important school-based factor affecting student success. Licensure plays an important role in ensuring that our children are interacting with high-quality professionals who have been specifically trained for their roles within the education system to support student achievement. Second, licensure ensures that individuals who work in our schools and interact with children receive an adequate criminal records check, are enrolled in the state's Rapback monitoring system and have been evaluated for compliance with the high ethical standards expected of professionals working with Ohio's children. Rapback provides real-time notifications regarding criminal arrests or convictions of licensed individuals to the Department of Education and employing schools or districts. The safety and security of Ohio's children is our top priority and obtaining a license is necessary for enrollment in the Rapback system.

RECOMMENDATION 1: Eliminate temporary pupil services licenses (school audiologist, school social worker, school speech-language pathologist, school nurse, occupational therapist, physical therapist, occupational therapy assistant, and physical therapy assistant). These licenses are already issued by their respective boards and therefore, by eliminating the extra license it avoids duplication and provides less restrictive access into their profession.

Although the professionals cited are licensed by their respective boards, not all licensing boards participate in the voluntary Rapback system. The Department of Education, however, is required by law to participate in Rapback (R.C. 3319.316). Therefore, all our licensees, including pupil services professionals, are enrolled in Rapback and the Department is notified of criminal arrests or convictions involving those individuals. Requiring pupil services professionals to have a license from the State Board of Education also enables the State Board to take disciplinary action when necessary. The safety of Ohio's children warrants the State Board having direct authority over professionals working in schools. In the absence of this authority, the State Board would be reliant on other licensing boards to take action against a person's license.

Additionally, the Temporary Pupil Services License allows candidates who have not completed an approved school licensure program and examination to work in schools while they are completing the requirements for the Professional Pupil Services License. Eliminating the temporary licenses would have the effect of restricting access into the profession because individuals who have not completed a

professional program would be unable to work in a school until they meet the qualifications for the Professional Pupil Services License.

RECOMMENDATION 2: Eliminate School Administrator Licenses (Alternative Principal, School Business Manager, School Treasurer). These licenses can inadvertently restrict the pool of applicants. Skills necessary for these positions can be listed in job postings.

The Alternative Principal License provides an alternative pathway for individuals to become licensed as a principal, opening the field to individuals who do not have a background in education. Without an alternative pathway, all individuals would be required to have a master's degree and complete an approved educator preparation program to qualify for a principal's license. Eliminating the Alternative Principal License would restrict the pool of qualified applicants and increase barriers to entry into the profession, rather than lower them.

School treasurers and school business managers are responsible for the proper use of public funds collected and spent by public schools. Licensure ensures that these individuals meet at least a minimum requirement for knowledge and competence in fiscal accounting and public ethics. The danger posed by an unqualified treasurer or business manager to the overall financial health and stability of a school or district can result in a fiscal emergency impacting an entire generation of students. In the case of gross incompetence or malfeasance, the State Board of Education may revoke the license of a school treasurer or business manager, preventing the individual from moving to another school or district.

RECOMMENDATION 3: Eliminate Paraprofessional License. By eliminating the license, it encourages people to enter this field without having to meet burdensome licensure requirements.

Educational aides are assigned to work with children with disabilities, often physically assisting these children with their day-to-day needs. As a result of their disabilities, these students are often unable to report concerns or protect themselves, putting them at even greater risk. Licensure of educational aides establishes minimum qualifications for working with this vulnerable population and ensures their enrollment in the Rapback system. Further, Ohio Revised Code 3319.074 and federal law require paraprofessionals working in settings supported with federal funds to be properly licensed. The requirements for licensure are not burdensome, requiring a high school diploma or the equivalent.

RECOMMENDATION 4: Resident Educator License – reduce RE program license duration to two years from four. Program curriculums can be completed in two years and the current four-year program hinders teacher retention rather than promoting it.

The Ohio Teacher Residency program began in 2011 as a four-year, entry-level program for classroom teachers to improve teacher retention, enhance teacher quality, and improve student achievement. Research shows that a significant percentage of teachers leave the profession within their first five years of teaching. Reasons cited for their decisions include lack of support, isolation, feeling overwhelmed or exhausted, and the challenges of addressing students with different learning styles and behavioral issues. With support from multiple stakeholder groups, the residency program was designed to address these concerns using a professional development and professional growth model. The program provides mentoring between experienced teachers and new teachers. This mentoring gives new teachers the instructional assistance and emotional support they need while navigating their initial years in the classroom. As teachers advance through the program, the mentoring activities may include co-teaching experiences or collaborative cohorts designed to promote in-depth analysis of teaching and student learning. The Resident Educator Summative Assessment in the third year of the program is an opportunity for teachers to reflect on their own practices and performance.

While the program has a statewide design with specific objectives, the program itself is delivered locally with discretion given to districts and schools in how they meet those objectives. Moreover, school districts may use federal funds earmarked for teacher professional development to support the program. Unlike

other teachers, teachers holding a Resident Educator License do not complete an individualized professional development plan, nor do they participate in the local professional development committee licensure renewal process. Completion of the Ohio Teacher Residency Program serves as their professional development requirement for advancing from a Resident Educator License to a standard five-year Professional Educator License.

RECOMMENDATION 5: Professional Educator License – lower initial license fee and renewal fee to \$100 from \$200. This change eases license regulation for those teaching Ohio’s youth.

The State Board of Education, which has authority to set fees for initial licenses and renewals (R.C. 3319.51), has been very conservative in its approach to increasing licensure fees. The State Board has established a tiered fee structure, offering licensees who are typically paid lower salaries (such as paraprofessionals) a lower licensure fee. Fees have not been increased in over ten years. As professional educator licenses are effective for five years, the \$200 fee costs an Ohio educator forty dollars per year. Further, licensure fees fund the operations of the Department of Education’s Office of Educator Licensure and Office of Professional Conduct. A decrease in fee amounts would drastically increase processing time for applications, as well as significantly hamper the ability of the Department to investigate and discipline educators for misconduct. This would have a direct effect on educators waiting for the processing of their applications and school districts working to staff their classrooms safely.

CONCLUSION

I appreciate the opportunity to respond to the recommendations made by the committee. The State Board of Education and the Department of Education are committed to ensuring the quality and effectiveness of teachers and other school personnel. We are equally committed to protecting the safety of our school children. Licensure is a crucial component to achieving these goals.