

MEMORANDUM

TO: PESB Members

FROM: Maren Johnson, Policy Development, Educator Credentialing, and Continuing Education

DATE: October 11, 2017

SUBJECT: TAB 09 – Presentation and Discussion: Review of Limited Educator Certificates in Washington State
(November 16, 1:20 - 2:10 p.m.)

BACKGROUND INFORMATION / PREVIOUS BOARD ACTION

Date	Action
July 2015	Revisions to Requirements for Certification of Intern and Emergency Substitute Certificates. https://drive.google.com/drive/u/1/folders/0B5d85w3Eol73fnJwLTlrREkxLU1qcjlCWUh1YnhRazl3bnRPUVZFenBUbjlwN0hNVVB6MGM
September 2015	PESB produces policy brief on addressing the recurring problem of teacher shortages. https://drive.google.com/file/d/0B-CWbSsnLOBqa0dDYmUzeVVkMnM/view
July 2016	Continuing CTE teacher certificate holders are eligible to earn the lifetime substitute certificate. https://drive.google.com/file/d/0B5d85w3Eol73ckloTkVXZnh3ZGM/view?usp=sharing
February 2017	Emergency certificates are available for ESAs nearing completion of their programs. https://docs.google.com/document/d/15yu21Wllw3TM0L0j8_IMEEgmFioXGyivFMzBmldoXUw/edit?usp=sharing
Spring/Summer 2017	PESB and OSPI staff begin review of CTE policy, including policy around limited CTE certificates: https://docs.google.com/document/d/1n_20NVagzESDiNISbNH9gQOd_yW-ZU81sBmuueaM3ug/edit?usp=sharing
Spring/Summer	The PESB conducts a survey of teachers with limited certificates.

2017	The purpose of survey includes understanding the level of interest in becoming certified teachers; the barriers that exist in becoming certified; and the supports that individuals may need. https://drive.google.com/drive/u/0/folders/0Bywqsyhf5L8rRFpmVTZiYVNmdnc
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Purpose of Limited Certificates:

Limited certificates provide flexibility in the Washington state educator certification system. With a limited certificate, educators who have not met full certification requirements may practice in classrooms and schools. All limited certificates require the passing of a background check.

Limited certificates are becoming entry points to the profession--they allow districts to encourage and support individuals who are committed to teaching to enter the field of education. Individuals pursuing alternative routes to certification can be the teacher of record with a limited certificate while they are completing their programs.

What is a limited certificate?

Limited certificates can be defined in two ways:

- **Limited in scope:** These certificates are generally limited in the types of situations in which they can be used, or limited by their validity period or number of times they can be renewed.
- **Certification application initiated by others:** Regular certificates are requested by the individuals who hold the certificates. On the other hand, the process for acquiring most limited certificates is initiated by the district or program, not the individual certificate holder.

Limited certificates are found in section 181-79a-231 of the WAC.

<http://apps.leg.wa.gov/WAC/default.aspx?cite=181-79A-231>

Why review the limited certificates now?

The teacher shortage over the last few years has greatly increased the numbers of limited certificates being issued. For example, in 2010-11, 703 emergency substitute certificates were issued; in 2014-15, that number was 2,495, and more than 4,000 were issued in 2015-16. <https://goo.gl/GAHLuo> Individuals may hold more than one type of limited certificate, so it is important to examine the system, and not just the individual certificate types.

The 2017 PESB survey of teachers with limited certificates revealed that one of the barriers to becoming a teacher that these individuals face is lack of knowledge about

their options. This emphasizes the need for clear policy around these certificates in order to help facilitate understanding on the part of the individuals, the districts, the programs, and other stakeholders.

Limited certificates have been added to WAC at various times over the years for various purposes. This has led to a lack of coherence in the limited certificate system--sometimes the purposes and uses of limited certificates overlap, and may even conflict. The WAC language regarding each type of limited certificates is not parallel, and it can be confusing to determine which certificate is needed in which situation, and what the requirements are.

Current federal policy may have a number of interactions with limited certificates in relation to in-field/out-of-field determination. The PESB is monitoring this issue, particularly as to issues around whether or not a bachelor's degree is required for specific limited certificates, and in regards to issues around public notification via school board agenda when a district requests a limited certificate.

One goal of this review would be to provide clarity by including the following components in the WAC language for each type of limited certificate:

1. Purpose
2. Roles
3. Minimum requirements
4. Process
5. Validity

Types of limited certificates and related policy

For clarity, this next section of this cover memo divides the limited certificates into three categories:

- Limited certificates for **teachers** and related ESA and administrator positions:
 - Conditional
 - Emergency
 - Nonimmigrant exchange
 - Transitional
- Limited certificates for **substitutes**:
 - Substitute
 - Emergency substitute
 - Intern substitute
- **Potential** certificate
 - Potential Pre-residency certificate: OPP has inquired about this possibility, and the PESB is exploring ideas.

Limited Certificates for Teachers

Current Policy	Conditional Teacher Certificate	Emergency Teacher Certificate
Purpose	“Assist local school districts, approved private schools, and educational service districts in meeting the state's educational goals by giving them flexibility in hiring decisions based on shortages or the opportunity to secure the services of unusually talented individuals.”	Although the purpose of the emergency certificate is not stated in WAC, the implied intent is to give an individual who has almost completed a program the opportunity to be the teacher of record for a limited amount of time while completing their program.
Minimum requirements	Applicant has “unusual distinction or exceptional talents” or experience in the subject matter to be taught OR No person with regular certificate is available OR Circumstances warrant	Applicant holds a bachelor's degree AND Is enrolled in a preparation program AND No person with regular certificate is available OR Circumstances warrant
Process	District initiates application. -Approved by school board -Assigned a mentor -Written plan of assistance -Individual completes 60 clock hours within the first 60 days -School board approval required	District initiates application.
Validity	Valid for two years. May be reissued every two years upon application by the school district and completion of sixty clock hours. Limit of two conditional certs for special ed.	Valid for one year. Renewable.

Roles for Conditional certificates: In addition to general ed teachers, separate provisions exist for issuance of conditional certificates to special education teachers,

school nurses, SLPs, and paraprofessionals qualified to be traffic safety instructors.

Roles for Emergency certificates: In addition to general ed teachers, separate provisions exist for issuance of emergency certificates to special education teachers, principals, school counselors, school psychologists, school social workers, and SLPs.

Potential merging of Conditional and Emergency Certificates?

Much confusion exists over which situation is appropriate for a conditional certificate, and which situation is appropriate for an emergency certificate. Frequently, districts will apply for the wrong type of certificate on behalf of the educator, complicating applications and slowing processing. Emergency certificates are often confused with emergency substitute certificates just because they have a similar name.

In addition, an educator may have substantially completed a program and qualify for an emergency certificate, but if that emergency certificate expires, then the educator is eligible for a conditional certificate, so it is not clear what purpose offering both certificates serve.

Emergency certificates are for teachers who are enrolled in programs and have a baccalaureate degree. Many may be enrolled in a BA/cert program, be almost finished, and yet not be able to get an emergency cert because they do not have a baccalaureate degree. However, these same individuals would qualify for a conditional certificate. This is not a consistent logic model.

There are some role-specific requirements for special education teachers, ESAs, and a few other roles that would need to be identified and kept in place if there were no longer both a conditional certificate and an emergency certificate.

Are the differences between an emergency certificate and a conditional certificate large enough to justify having two separate certificates? If the provisions were modified, could individuals who now receive emergency certificates instead receive conditional certificates? What elements of these two certificates would be important to include with a combined certificate? Ideas around validity, renewal, requirement of a bachelor's degree?

To consider:

- A bachelor's degree is required for an emergency certificate, but not a conditional certificate. If the emergency certificate were eliminated, baccalaureate degrees would not be required for conditional certificates, as many conditional certificate holders are enrolled in, but have not yet completed, BA/cert programs. In addition, many conditional certificate holders have "unusual distinction or exceptional talents," but do not have a bachelor's degree.
- The requirement of a mentor is included for conditional teacher certificate holders. 181-79a-231 (1)(e)(2). To consider:

- Add language regarding requiring mentors for emergency teacher certificate holders? If conditional and emergency certificates are merged, retain language relating to the mentor requirement?

Nonimmigrant Exchange Teacher Certificate

To consider:

- WAC language is very minimal. Is it sufficient?
WAC in 181-79A-231: (5) Nonimmigrant alien exchange teacher. Applicants for certification as a nonimmigrant alien exchange teacher must qualify pursuant to WAC 181-79A-270 and be eligible to serve as a teacher in the elementary or secondary schools of the country of residence.
- 181-79A-231 only mentions teachers. WAC in 181-79A-270 mentions principals and counselors as well. Do those roles need to be mentioned in 181-79A-231?
 - WAC 181-79A-270 Teacher, principal, and educational staff associate exchange permits may be issued by the superintendent of public instruction to an individual admitted to the United States for the purpose of serving as an exchange teacher, principal, or educational staff associate. Such teacher, principal, or educational staff associate exchange permits shall be valid for one year and may be renewed while being sponsored by a school district in the exchange and visiting teacher program.

Transitional certificate

	Transitional Certificate
Purpose	An individual whose continuing certificate has expired may be issued a transitional certificate to be employed upon request by a school district.
Roles	Only expired continuing certificate holders: teacher, administrator, and ESA.
Minimum requirements	The individual must complete the necessary continuing certificate renewal requirements within two years.
Process	District initiates application.
Validity	Two years. Only once per lifetime.

Note: September board action on 1341-related WAC change provides different procedures for expired residency and professional certificates than for continuing certificates.

The 100 clock hours or equivalent for renewal of a lapsed or expired teacher, principal,

program administrator or ESA residency or professional certificate must be completed within the previous five years from the date of the five-year renewal application.

Limited Certificates for Substitutes

Current Policy	Substitute	Emergency Substitute	Intern Substitute
Purpose	“The substitute certificate entitles the holder to act as substitute during the absence of the regularly certificated staff member for a period not to exceed one hundred eighty days during the school year in any one assignment.”	Holders of emergency substitute certificates may be used in a district “once the list of otherwise qualified substitutes has been exhausted.”	Intern substitute teacher certificates are for student teachers/interns and may be used, “only in the classroom(s) to which the individual is assigned as a student teacher/intern.” This allows consistency when the teacher of record is absent.
Roles	Teacher, administrator, ESA.	Teacher, Administrator. Emergency substitute certificates may not be issued to ESAs.	Teacher only.
Minimum requirements	Regular state of Washington certification in the role, or a CTE continuing certificate.	Background check.	“The supervising college or university must approve the candidate for the intern substitute teacher certificate.”
Process	Individuals apply for this certificate.	District initiates application for this certificate.	District initiates application. Program must approve.
Validity	Valid for life.	Three years.	One year.

Emergency substitute certificates are on the rise out of necessity as districts report dwindling substitute pools. The Emergency Substitute Certificate does not require a baccalaureate degree nor any preparation / training.

By contrast, individuals eligible for the Intern substitute certificate have, or are near completion of, a baccalaureate degree and have substantially completed a preparation program, but their placement is restricted to the classroom in which they are assigned for student teaching and requires permission from the preparation program in which they are enrolled.

Sometimes an individual in a preparation program will, for a variety of reasons, not hold an intern sub certificate, but instead will hold an emergency sub certificate. Some individuals in preparation programs may hold both an emergency sub and an intern sub. To consider:

- Should restrictions be placed on individuals in preparation programs subbing outside of their assignment areas, regardless of which type of sub certificate they hold?
- See also the section below on the Pre-residency Certificate for considerations regarding potential interactions between the emergency sub certificate, the intern sub certificate, and the pre-residency certificate.

To consider:

- Currently, both substitute certificate holders and emergency substitute certificate holders can be placed in the same assignment for up to 180 days. Is it important to the field that emergency substitute certificate holders are eligible for this extended time in one assignment?

The substitute certificate is the only limited certificate requested by the individual certificate holder. The other limited certificates are requested by districts, programs, or jointly by the individual and a district/program. In this important respect, it has much more in common with the other certificates that require completion of a preparation program. Instead of including this certificate in 181-79A-231, it may be best to list the substitute certificate separately in 181-79A-140 <http://apps.leg.wa.gov/WAC/default.aspx?cite=181-79A-140> and describe its provisions in 181-79A-145 <http://apps.leg.wa.gov/WAC/default.aspx?cite=181-79A-145>.

Potential certificate: Pre-residency certificate

The Office of Professional Practice (OPP) has inquired about the possibility of a pre-residency certificate. A pre-residency certificate would be held by an intern or student teacher. A representative from OPP will be at the November PESB meeting to share relevant issues with the board, and board members will be deciding whether to pursue development of this certificate. The PESB is currently at the beginning stages of exploring ideas around this potential certificate.

Currently, prior to being in the classroom, intern or student teachers must obtain a pre-residency clearance which involves passing a fingerprint background check. If this intern or student teacher violates the Code of Professional Conduct, OPP has no jurisdiction to investigate or to act. A district or law enforcement could take action of

some kind depending on the behavior, but OPP could not. The individual has no certificate, so a certificate cannot be revoked. The individual cannot be tracked if they move to a different district or state. The individual cannot be entered into the NASDTEC clearinghouse, a national database.

Among the issues to consider if the board decides to develop a pre-residency certificate:

1. Who initiates the application?
2. Eligibility to sub?
3. Validity period?
4. Which roles may require a pre-residency certificate

CTE Limited Certificates:

The CTE limited certificates are not included in this WAC review. The PESB and OSPI are currently working on a comprehensive review of CTE certification, and the limited CTE certificates will be included in that process. Information regarding the CTE limited certificates is provided here to allow a full picture of limited certificates in Washington state. <http://apps.leg.wa.gov/wac/default.aspx?cite=181-77-014>

Current Policy	Conditional CTE Certificate	Probationary CTE Certificate
Purpose	Issued when “no regularly certificated CTE instructor is available.”	Although the purpose of the probationary CTE certificate is not stated in WAC, the implied intent is to give an individual who has almost completed a program the opportunity to be the teacher of record for a limited amount of time while completing their program.
Minimum requirements	Must have significant knowledge and experience in the area OR Has met the occupational experience required for an initial CTE certificate OR Will be employed in new and emerging occupations	Substantial completion of requirements for the initial CTE certificate.
Process	Initiated by district. A written training plan for growth is on file with the district.	Initiated by district. A written training plan for growth is on file with the district.

Validity	Valid for one year. May be reissued.	Valid for two years and renewable one time for two additional years.
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ANTICIPATED OUTCOME(s)

Staff will present information on a review of limited certificates for Board discussion and feedback.

Work Plan Goal:

Goal 1— All qualified individuals are able to pursue educator preparation that leads to employment.