

**Policy 5202: Minimum Requirements for the Licensure of Professional/ Paraprofessional
Personnel and Advanced Salary Classifications
Comment Log**

Open for Public Comment September 13, 2013 through 4:00 p.m. on October 15, 2013.

Action
N: No Response
NA: Not Accepted
A: Accepted

Type
- Negative
+ Positive
o Neutral

Date	Individual/Organization	Comments	Action/ Type	Rationale
09-18-13	Name: Marsha Oot Organization: Jefferson County Schools Title: Certification Coordinator City/State: Charles Town, WV Role: School System Staff	Comments for section 126-136-11 Permits Issued to Professional Educators ----- Regarding RENEWAL of the First Class Permit....Explanation If all coursework has been completed with only test requirements remaining, the institute of higher education may recommend the permit to be renewed as the tests are part of the required educational program which leads to certification. By doing so, the county of employment will not need to request from the State Superintendent, an extension to the permit. Therefore, add: "Completion of all coursework of the required educational program from an accredited institution of higher education as defined in 126- 136-4.5 reflecting a minimum 3.0 GPA within the institution AND with the exception of test requirements."	NA/0	The comment was not accepted. The Federal definition of 'completer' does not include language regarding assessments. Additionally, not all teacher preparation programs require a student to pass 'tests' in order to graduate or become 'program completers. However, passing scores on assessments are required by the WVBE as a condition for licensure. Therefore, this language will not be revised to include test exceptions.

09-18-13	<p>Name: Dale Shaffer Organization: Jefferson County Schools Title: HR Coordinator City/State: Charles Town, WV Role: School System Staff</p>	<p>Comments for section 126-136-11 Permits Issued to Professional Educators ----- Regarding RENEWAL of the First Class Permit. Explanation If all coursework has been completed with only test requirements remaining, the institute of higher education may recommend the permit to be renewed as the tests are part of the required educational program which leads to certification. By doing so, the county of employment will not need to request from the State Superintendent, an extension to the permit. Therefore, add: "Completion of all coursework of the required education program from an accredited institution of higher education as defined in 126-136-4.5 reflecting a minimum 3.0 GPA within the institution AND with the exception of test requirements."</p>	NA/0	<p>The comment was not accepted. The Federal definition of 'completer' does not include language regarding assessments. Additionally, not all teacher preparation programs require a student to pass 'tests' in order to graduate or become 'program completers. However, passing scores on assessments are required by the WVBE as a condition for licensure. Therefore, this language will not be revised to include test exceptions.</p>
09-24-13	<p>Name: Andrea Clark Organization: Mingo Central Title: Registered Nurse, Health Science Educator City/State: Delbarton, WV Role:</p>	<p>Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate ----- 7045 Medical Assistant--Add Registered Nurse to the Required Industry Credentials for CTE Certification.</p>	A/+	<p>Language was added to include 'Registered Nurse' as a Required Industry Credentials for CTE Certification for 7045 Medical Assistant.</p>

<p>9/25/13</p>	<p>Name: Danny Dailey Organization: Lincoln County Schools Title: Technology Director City/State: Barboursville, WV Role: School System Staff</p>	<p>Comments for section APPENDIX A Programmatic Levels and Specializations Recognized on the Professional License ----- For the Technology System Specialist (TSS) I would like to see the annual hours lower from 15 to 12 hours per year. It would be nice that after a period of say 2-3 years for the TSS to get a permanent/semi-permanent certification option where they only had to get 12 hours every three years to keep it. It would be less paperwork for county and state department and the TSS would still keep up on the latest technology.</p>	<p>A/+</p>	<p>This comment was accepted and language added accordingly.</p>
<p>9/26/13</p>	<p>Name: Julie Burky Organization: Randolph County Schools Title: Technology Support Specialist City/State: Elkins, WV Role: Professional Support</p>	<p>Comments for section 126-136-24 Advanced Credentials ----- As a current Technology Support Specialist, it would be helpful to have the annual WVDE TSS training hours requirement be lowered from 15 hours to 12 hours. Doing so would allow us (TSS's) to complete our required training hours at one given time. I am also requesting an option to have a long term certification available after completing two initial years in the Technology Support Specialist position. Thank you for consideration.</p>	<p>A/+</p>	<p>This comment was accepted and language added accordingly.</p>

9/26/13	<p>Name: Jonathan Paine Organization: Randolph County Schools Title: Director of Technology City/State: Elkins, WV Role: Professional Support</p>	<p>Comments for section 126-136-24 Advanced Credentials ----- I am respectfully requesting changes to the Technology Support Specialists (TSS) certification requirements. (1) Currently, I send our county TSS staff members to two scheduled events to complete their 15 required WVDE training hours. If this requirement is lowered to 12 hours, my staff could complete their hours over one event instead of two. As of right now, one training event offered by the WVDE Office of Technology has consisted of 12 hours total, not 15. Therefore the 3 remaining training hours would have to be accounted for at a future date/training. (2) I am also requesting the TSS certification life be extended over multiple years rather than renewed annually. After completing two years of experience in the TSS position, the TSS should be able to apply for a multiple-year certification valid for more than one year as the WVBE sees appropriate. Thank you for your consideration.</p>	A/+	This comment was accepted and language added accordingly.
9/27/13	<p>Name: Andrea Clark Organization: Mingo Central High School Title: RN/ Health Science Educator</p>	<p>Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate -----</p>	A/0	This comment was accepted and language added accordingly.

	<p>City/State: Delbarton, WV Role: Teacher</p>	<p>7603 Phlebotomist Add American Medical Technologist Association (AMTA) to Industry Credentialing Organizations 7172 Medical Lab Technician Change AMT to full abbreviation AMTA – American Medical Technologist Association</p>		
<p>9/28/13</p>	<p>Name: David Kenney Organization: Berkeley County Schools Title: Director of Research & Technology City/State: Martinsburg, WV Role: School System Staff</p>	<p>Comments for section 126-136-11 Permits Issued to Professional Educators ----- For the TSS position, please consider changing the required number of hours for renewal from 15 to 12 so the requirement can be met during either the winter or spring technology network conference. Also for the TSS position, please consider changing the renewal process so the permit holder can apply for a permanent permit on the third renewal.</p>	<p>A/+</p>	<p>This comment was accepted and language added accordingly.</p>
<p>10-1-13</p>	<p>Name: Beth Mayfield Organization: MTEC Title: Surgical Technology Instructor City/State: Morgantown, WV Role: Teacher</p>	<p>Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate ----- 7607 should be renamed Surgical Technologist, not technician. The required industry credentials should read Certified Surgical Technologist or Certified Surgical Technologist/Surgical Assistant and the Industry</p>	<p>A/+</p>	<p>This comment was accepted and language revised accordingly.</p>

	Credentiaing Organization is the National Board of Surgical Technology and Surgical Assisting		
10-2-13	<p>Name: Shannon Brown Organization: Randolph County Schools Title: Technology Support Specialist City/State: Elkins, WV Role: Professional Support</p>	<p>Comments for section 126-136-24 Advanced Credentials ----- If the required 15 hours of Technology Support Specialist training was reduced to 12 hours, it would allow us to fulfill the certification requirement by attending one (2 day) WVDE Network Design and Strategies Workshop. As of now, we must attend the workshop and also attend an additional event in order to obtain the 3 remaining hours necessary for the certification. It would also be accommodating if after two years of initial experience at the Technology Support Specialist position, we qualify to acquire a certification that is valid for several years. Thank you.</p>	<p>A/+ This comment was accepted and language added accordingly.</p>
10-2-13	<p>Name: Brenda Tuckwiller Organization: WVU Institute of Technology Title: Chair, Dept. of Career Tech Ed City/State: Montgomery, WV Role: Higher Education Faculty</p>	<p>Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Permit and Career/Technical Certificate ----- Appendix C, beginning on p 109, Health Science Education. Just want to make sure there is sufficient clarity re: 1)Wage earning work experience vs. "relevant teaching experience</p>	<p>A/+ As a result of this comment, language was revised to clarify wage earning experience is equal to work experience requirements for CTE endorsements.</p>

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may count as equal to work experience requirements" especially for registered nurses being hired by counties to teach in Practical Nursing etc. Example: County hired an RN with Master's Degree in Nursing Education, years of teaching in an RN program at a college, nurse left college job, moved family, entered the classroom, only for the county to find out her documented long-term, patient-side wage earning work experience added only up to 6 months rather than the required 1 year. Her teaching experience could not be substituted for this, and her other years of wage earning work experience were in areas of acute care. This county had to release her from employment after several months of working because her credentials were not satisfied. Essentially, because some health science programs can substitute teaching experience, it should be very clear which parts of the work experience may be substituted by teaching experience and which parts cannot. The language may be adequate as stated in the proposed revision--I am just anticipating that a quick read by a personnel director inexperienced in CTE would open the door for misinterpretation. 2) Cyndy Sundstrum and Deb Catron will be valuable resources in making sure there is no confusion re: accepting teaching experience as a substitute for actual wage-earning, patient-side care work experience related to the requirements of the Board of

	<p>Examiners for Registered Nurses (WV RN licensing board) and OHFLAC mandates for those nurses charged with supervising and directing students in a clinical setting.</p>		
<p>10-2-13</p>	<p>Name: Brenda Tuckwiller Organization: WVU Institute of Technology Title: Chair, Dept. of Career Tech Ed City/State: Montgomery, WV Role: Higher Education Faculty</p>	<p>Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate ----- Job Corps career and technical education teacher's process for CTE teaching permit/certificate. Until a few years ago, engineering/technical, hospitality, health occupations, etc. teachers' applications for CTE teaching permit/certificate were "signed off" and routed through the appropriate county school system central office. At the point that the applications began being signed off by the WVDE Office of Institutional Education Programs (currently by Mr. Greene), and they no longer were routed through [Kanawha] County schools central office, there was no actual "category" for the Job Corps teachers on many of the forms-- there were choices such as the 55 counties, WVSDB, RESAs, parochial schools, etc. but nothing for "OTHER" or anything appropriate to check for Job Corps. These teachers are still completing the teacher testing, occupational competency testing, industry credentialing and coursework required for individuals coming</p>	<p>NA/0</p>
			<p>This comment will be referred to the WVBE Policy 5202 CTE Administrative Stakeholder group for consideration during the next policy revision.</p>

		<p>directly from business and industry into the CTE classrooms. Their teaching permit and certificate process remains the same as all others, public school and institutional CTE (vocational) teachers, there is just not a category any more where they fit on the forms.</p>		
<p>10-3-13</p>	<p>Name: Don Hepler Organization: Randolph County Schools Title: Technology Support Specialist City/State: Elkins , WV Role: Professional Support</p>	<p>Comments for section 126-136-24 Advanced Credentials ----- I would like to request that consideration be given for an option to have a long term certification available after completing the first two initial years in the Technology Support Specialist position. This would mean that the TSS certification life would be extended over several years rather than renewed annually. Then, after completing two years of experience in the TSS position, the TSS should be able to apply for a multiple-year certification that would be valid for more than one year. Also, since training is currently offered in 12 hour increments over two days, if it were possible that the requirements were reduced from 15 to 12 hours we would be able to complete our requirements for accreditation in one two day session rather than having to go back months later for an additional half day for completion. Thank you for considering my request.</p>	<p>A/+</p>	<p>This comment was accepted and language added accordingly.</p>

10/4/13	<p>Name: Ryan Haught Organization: Mid-Ohio Valley Technical Institute Title: St. Marys City/State: West Virginia, 26170 Role: Principal</p>	<p>Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate ----- Teacher endorsement needed for automotive machining as skill sets differ from automotive technology.</p>	A/+	<p>This comment was accepted and language added accordingly. New Endorsement was added: Automotive Machining</p>
10-11-13	<p>Name: Scott Staley Organization: Mineral County Schools Title: Director City/State: Keyser, WV Role: School System Staff</p>	<p>Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate ----- 7052 Welding – Under the required industry credentials for CTE Certification, instead of only reading SMAW and GMAW Plate, it should state SMAW and GMAW Plate in the 2G, 3G and 4G positions.</p>	A/+	<p>Under the required industry credential for CTE Certification, language was added to reflect the following, "SMAW and GMAW Plate in the 2G, 3G and 4G positions."</p>
10/11/13	<p>Name: Ryan Haught Organization: Mid-Ohio Valley Technical Institute Title: St. Marys City/State: West Virginia, 26170 Role: Principal</p>	<p>Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate ----- 7083 Air Conditioning and Refrigeration - The first industry credential should be changed to Industry Competency Exams (ICE) and the Industry Credentialing Organization should be Industry Competency Exams (ICE) Certified Testing Center. The second should be changed</p>	A/+	<p>This comment was accepted and language added accordingly.</p>

<p>10-14-13</p>	<p>Ralph M. Shenefelt – SVP, Strategic Partnerships P 800 447 3177, x390 Health & Safety Institute 1450 Westec Drive Eugene, OR 97402 www.hsi.com</p>	<p><u>VIA EMAIL & FEDERAL EXPRESS</u></p> <p>Monica Beane, Ed.D Interim Director WVDE Office of Professional Preparation Capitol Bldg. 6, RM. 252 1900 Kanawha Blvd. East Charleston, WV 25305 mbeane@access.k12.wv.us</p> <p>RE: Proposed Rule Comments WVBE Policy 5202; 09/20/2013</p> <p>Dear Dr. Beane:</p> <p>The purpose of this letter is to - <i>once again</i> - express strong opposition to the unreasonably restrictive language of the proposed amendments to West Virginia State Board of Education (“Board”) Policy 5202.</p> <p>Proposed Rule</p> <ol style="list-style-type: none"> 1. The Board’s proposed amendments contain twenty (20) instances of language prescribing the private sector products of the American Heart Association®, Inc. (“AHA”) and the American Red Cross (“ARC”) as the only acceptable “Industry Credentialing 	<p>A/+</p>	<p>Language was added to include the following agencies as acceptable: American Red Cross or American Heart Association or American Safety & Health Institute or Emergency Care & Safety Institute or National Safety Council.</p>
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Organizations”.

2. The Board’s proposed amendments strike current language permitting “other nationally recognized training programs” (EXHIBIT A).

Requested Amendments

1. Eliminate the proposed strikes that permit “other nationally recognized training programs”, or alternatively, add the “American Safety and Health Institute” (“ASHI”) and “MEDIC First Aid” to the rule as an acceptable “Industry Credentialing Organization”.

Reasons

1. As previously stated in our July 10, 2012 (EXHIBIT B) and June 4, 2013 (EXHIBIT C) approved rule comments that resulted in the incorporation of language permitting “other nationally recognized training programs” (EXHIBIT D); promulgation and enforcement of the Board’s proposed rule places unfair and unreasonable restrictions on competition, penalizes licensees, and causes a loss of business.

We value, believe in, and promote successful

completion of a legitimate CPR and first aid course as an important component in protecting safety and health. We value, believe in, and promote free and fair competition that does not adversely affect health and safety. We look forward to helping the Board protect the health and safety of the citizens of West Virginia. We strongly prefer a non-adversarial approach.

Respectfully,

Ralph M. Shenefelt
Senior Vice President
Health and Safety Institute

Cc:

Gregory R. Ciottone, MD, FACEP, Medical Director, Health and Safety Institute
Bill Clendenen, MBA, Chief Executive Officer, Health and Safety Institute
Jeff Jackson, MBA, Chief Financial Officer & President, Health and Safety Institute
Jeff Lindsey, PhD, Chief Learning Officer, Health and Safety Institute
Steve Barnett, MBA, Vice President, Strategic Compliance
Kristal Langner, Regulatory Approval Specialist, Health and Safety Institute

10-15-13	<p>Name: Mary Beckelheimer Organization: Putnam County Schools Title: Director of Technology City/State: Winfield , WV Role: School System Staff</p>	<p>Comments for section 126-136-11 Permits Issued to Professional Educators ----- 11.9.C.1.LL - Technology System Specialists can renew the temporary authorization. The Technology System Specialists should be able to receive a permanent authorization instead of having to renew annually. 11.9.c.1.LL.1 - Why not 12 hours, which means two days? The trainings the state offers are usually two day trainings, and the extra 3 hours are always difficult to work out.</p>	A/+	Comment was accepted and language was added accordingly.
10-15-13	<p>Name: Mary Beckelheimer Organization: Putnam County Schools Title: Director of Technology City/State: Winfield , WV Role: School System Staff</p>	<p>Comments for section 126-136-24 Advanced Credentials ----- 24.4.A Technology Integration Specialists need to be able to have permanent credentials. While I agree that they need to keep up with the changes in technology, they should have the opportunity to become permanently certified at some point. The fact that they have to pay \$25 every year to keep their credentials is out of alignment with other advanced credentials.</p>	NA/+	This comment was not accepted, but will be forwarded to the WVBE Policy 5202 Stakeholder group for consideration during the next policy revision.
10-15-13	<p>Name: Mary Beckelheimer Organization: Putnam County Schools Title: Director of</p>	<p>24.4.B.2 The required 40 hours of training for annual renewal of TIS credentials is out of alignment with other advanced credential. In our county, we don't have any full-time TIS. All</p>	NA/+	This comment was not accepted, but will be forwarded to the WVBE

	<p>Technology City/State: Winfield , WV Role: School System Staff</p>	<p>of ours are teachers or librarians. They can't do the 40 hour of renewal during their regular employment day as a full-time TIS can. They must do this time in the evening, on weekends, or in the summer. They are not compensated for their time or expenses for additional training.</p>		<p>Policy 5202 Stakeholder group for consideration during the next policy revision.</p>
<p>Diana Dunn, Program Coordinator – Sr. Fairmont State University</p>	<p>Technology Education is not reflected in the Appendix C. Without this endorsement area, students who are currently enrolled in Fairmont State University's approved Technology Education program will not be eligible for licensure in West Virginia. Please explain why this endorsement was removed from policy and add it back to the Appendix C if possible.</p>	<p>A+</p>		<p>A comment from Fairmont University revealed that the Technology Education endorsement was erroneously removed from policy during the previous policy revision. Without the inclusion of this endorsement area, students currently enrolled in FSU's approved program would not be eligible to be recommended for endorsement in this area upon meeting graduation requirements. Technology Education 5-AD was added to the Appendix C.</p>

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Wednesday, September 18, 2013 1:06 PM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-09-18 13:06:03)

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Comment Received for Policy 5202

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Name: Marsha Oot
Organization: Jefferson County Schools
Title: Certification Coordinator
City/State: Charles Town, WV
Role: School System Staff
Posted: 2013-09-18 13:06:03
Posted from IP:

Comments for section 126-136-11 Permits Issued to Professional Educators

Regarding RENEWAL of the First Class Permit....Explanation
If all coursework has been completed with only test requirements remaining, the institute of higher education may recommend the permit to be renewed as the tests are part of the required educational program which leads to certification. By doing so, the county of employment will not need to request from the State Superintendent, an extension to the permit.
Therefore, add: "Completion of all coursework of the required educational program from an accredited institution of higher education as defined in 126-136-4.5 reflecting a minimum 3.0 GPA within the institution AND with the exception of test requirements."

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Wednesday, September 18, 2013 1:12 PM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-09-18 13:12:08)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 5202

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Name: Dale Shaffer
Organization: Jefferson County Schools
Title: HR Coordinator
City/State: Charles Town, WV
Role: School System Staff
Posted: 2013-09-18 13:12:08
Posted from IP:

Comments for section 126-136-11 Permits Issued to Professional Educators

Regarding RENEWAL of the First Class Permit..Explanation
If all coursework has been completed with only test requirements remaining, the institute of higher education may recommend the permit to be renewed as the tests are part of the required educational program which leads to certification. By doing so, the county of employment will not need to request from the State Superintendent, an extension to the permit.
Therefore, add: "Completion of all coursework of the required education program from an accredited institution of higher education as defined in 126-136-4.5 reflecting a minimum 3.0 GPA within the institution AND with the exception of test requirements."

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Tuesday, September 24, 2013 11:11 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-09-24 11:11:19)

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Comment Received for Policy 5202

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Name: Andrea Clark
Organization: Mingo Central
Title: Registered Nurse, Health Science Educator
City/State: Delbarton, WV
Role:
Posted: 2013-09-24 11:11:19
Posted from IP:

Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate

7045 Medical Assistant--Add Registered Nurse to the Required Industry Credentials for CTE Certification.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Wednesday, September 25, 2013 3:08 PM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-09-25 15:08:08)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 5202

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Name: Danny Dailey
Organization: Lincoln County Schools
Title: Technology Director
City/State: Barboursville, WV
Role: School System Staff
Posted: 2013-09-25 15:08:08
Posted from IP:

Comments for section APPENDIX A Programmatic Levels and Specializations Recognized on the Professional License

For the Technology System Specialist (TSS) I would like to see the annual hours lower from 15 to 12 hours per year. It would be nice that after a period of say 2-3 years for the TSS to get a permanent/semi permanent certification option where they only had to get 12 hours every three years to keep it. It would be less paperwork for county and state department and the TSS would still keep up on the latest technology.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Thursday, September 26, 2013 1:38 PM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-09-26 13:38:01)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 5202

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Name: Julie Burky
Organization: Randolph County Schools
Title: Technology Support Specialist
City/State: Elkins, WV
Role: Professional Support
Posted: 2013-09-26 13:38:01
Posted from IP:

Comments for section 126-136-24 Advanced Credentials

As a current Technology Support Specialist, it would be helpful to have the annual WVDE TSS training hours requirement be lowered from 15 hours to 12 hours. Doing so would allow us (TSS's) to complete our required training hours at one given time. rnrnl am also requesting an option to have a long term certification available after completing two initial years in the Technology Support Specialist position. rnrnThank you for consideration.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Thursday, September 26, 2013 1:46 PM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-09-26 13:45:56)

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Comment Received for Policy 5202

#####

Name: Jonathan Paine
Organization: Randolph County Schools
Title: Director of Technology
City/State: Elkins, WV
Role: Professional Support
Posted: 2013-09-26 13:45:56
Posted from IP:

Comments for section 126-136-24 Advanced Credentials

I am respectfully requesting changes to the Technology Support Specialists (TSS) certification requirements. (1) Currently, I send our county TSS staff members to two scheduled events to complete their 15 required WVDE training hours. If this requirement is lowered to 12 hours, my staff could complete their hours over one event instead of two. As of right now, one training event offered by the WVDE Office of Technology has consisted of 12 hours total, not 15. Therefore the 3 remaining training hours would have to be accounted for at a future date/training. (2) I am also requesting the TSS certification life be extended over multiple years rather than renewed annually. After completing two years of experience in the TSS position, the TSS should be able to apply for a multiple-year certification valid for more than one year as the WVBE sees appropriate. Thank you for your consideration.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Friday, September 27, 2013 3:16 PM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-09-27 15:16:17)

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Comment Received for Policy 5202

#####

Name: Andrea Clark
Organization: Mingo Central High School
Title: RN/ Health Science Educator
City/State: Delbarton, WV
Role: Teacher
Posted: 2013-09-27 15:16:17
Posted from IP:

Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate

7603 Phlebotomist Add American Medical Technologist Association (AMTA) to Industry Credentialing Organizations
rn7172 Medical Lab Technician Change AMT to full abbreviation AMTA – American Medical Technologist Association

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Saturday, September 28, 2013 10:36 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-09-28 10:35:34)

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Comment Received for Policy 5202

#####

Name: David Kenney
Organization: Berkeley County Schools
Title: Director of Research & Technology
City/State: Martinsburg, WV
Role: School System Staff
Posted: 2013-09-28 10:35:34
Posted from IP:

Comments for section 126-136-11 Permits Issued to Professional Educators

For the TSS position, please consider changing the required number of hours for renewal from 15 to 12 so the requirement can be met during either the winter or spring technology network conference. Also for the TSS position, please consider changing the renewal process so the permit holder can apply for a permanent permit on the third renewal.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Tuesday, October 1, 2013 11:36 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-01 11:36:21)

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Comment Received for Policy 5202

#####

Name: Beth Mayfield
Organization: MTEC
Title: Surgical Technology Instructor
City/State: Morgantown, WV
Role: Teacher
Posted: 2013-10-01 11:36:21
Posted from IP:

Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate

7607 should be renamed Surgical Technologist, not technician. The required industry credentials should read Certified Surgical Technologist or Certified Surgical Technologist/Surgical Assistant and the Industry Credentialing Organization is the National Board of Surgical Technology and Surgical Assisting

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Wednesday, October 2, 2013 9:12 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-02 09:11:51)

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Comment Received for Policy 5202

#####

Name: Shannon Brown
Organization: Randolph County Schools
Title: Technology Support Specialist
City/State: Elkins, WV
Role: Professional Support
Posted: 2013-10-02 09:11:51
Posted from IP:

Comments for section 126-136-24 Advanced Credentials

If the required 15 hours of Technology Support Specialist training was reduced to 12 hours, it would allow us to fulfill the certification requirement by attending one (2 day) WVDE Network Design and Strategies Workshop. As of now, we must attend the workshop and also attend an additional event in order to obtain the 3 remaining hours necessary for the certification. It would also be accommodating if after two years of initial experience at the Technology Support Specialist position, we qualify to acquire a certification that is valid for several years. Thank you.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Wednesday, October 2, 2013 11:18 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-02 11:18:04)

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Comment Received for Policy 5202

#####

Name: Brenda Tuckwiller
Organization: WVU Institute of Technology
Title: Chair, Dept of Career Tech Ed
City/State: Montgomery, WV
Role: Higher Education Faculty
Posted: 2013-10-02 11:18:04
Posted from IP:

Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate

Appendix C, beginning on p 109, Health Science Education. Just want to make sure there is sufficient clarity re:rn1)Wage earning work experience vs. "relevant teaching experience may count as equal to work experience requirements" especially for registered nurses being hired by counties to teach in Practical Nursing etc. Example: County hired an RN with Masters Degree in Nursing Education, years of teaching in an RN program at a college, nurse left college job, moved family, entered the classroom, only for the county to find out her documented long-term, patient-side wage earning work experience added only up to 6 months rather than the required 1 year. Her teaching experience could not be substituted for this, and her other years of wage earning work experience were in areas of acute care. This county had to release her from employment after several months of working because her credentials were not satisfied. Essentially, because some health science programs can subs!

titute teaching experience, it should be very clear which parts of the work experience may be substituted by teaching experience and which parts cannot. The language may be adequate as stated in the proposed revision--I am just anticipating that a quick read by a personnel director inexperienced in CTE would open the door for misinterpretation.rn2) Cyndy Sundstrum and Deb Catron will be valuable resources in making sure there is no confusion re: accepting teaching experience as a substitute for actual wage-earning, patient-side care work experience related to the requirements of the Board of Examiners for Registered Nurses (WV RN licensing board) and OHFLAC mandates for those nurses charged with supervising and directing students in a clinical setting.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Wednesday, October 2, 2013 11:52 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-02 11:51:50)

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Comment Received for Policy 5202

#####

Name: Brenda Tuckwiller
Organization: WVU Insititute of Technology
Title: Chair, Dept of Career Tech Ed
City/State: Montgomery, WV
Role: Higher Education Faculty
Posted: 2013-10-02 11:51:50
Posted from IP:

Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate

Job Corps career and technical education teachers process for CTE teaching permit/certificate. Until a few years ago, engineering/technical, hospitality, health occupations, etc. teachers' applications for CTE teaching permit/certificate were "signed off" and routed through the appropriate county school system central office. At the point that the applications began being signed off by the WVDE Office of Institutional Education Programs (currently by Mr. Greene), and they no longer were routed through [Kanawha] County schools central office, there was no actual "category" for the Job Corps teachers on many of the forms--there were choices such as the 55 counties, WVSDb, RESAs, parochial schools, etc. but nothing for "OTHER" or anything appropriate to check for Job Corps. These teachers are still completing the teacher testing, occupational competency testing, industry credentialing and coursework required for individuals coming directly from business and industry into the !
CTE classrooms. Their teaching permit and certificate process remains the same as all others, public school and institutional CTE (vocational) teachers, there is just not a category any more where they fit on the forms.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Thursday, October 3, 2013 8:48 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-03 08:47:52)

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Comment Received for Policy 5202

#####

Name: Don Hepler
Organization: Randolph County Schools
Title: Technology Support Specialist
City/State: Elkins , WV
Role: Professional Support
Posted: 2013-10-03 08:47:52
Posted from IP:

Comments for section 126-136-24 Advanced Credentials

I would like to request that consideration be given for an option to have a long term certification available after completing the first two initial years in the Technology Support Specialist position. This would mean that the TSS certification life would be extended over several years rather than renewed annually. Then, after completing two years of experience in the TSS position, the TSS should be able to apply for a multiple-year certification that would be valid for more than one year. Also, since training is currently offered in 12 hour increments over two days, if it were possible that the requirements were reduced from 15 to 12 hours we would be able to complete our requirements for accreditation in one two day session rather than having to go back months later for an additional half day for completion. Thank you for considering my request.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Friday, October 4, 2013 11:29 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-04 11:28:47)

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Comment Received for Policy 5202

#####

Name: Ryan Haught
Organization: Mid-Ohio Valley Technical Institute
Title: St. Marys
City/State: West Virginia, 26170
Role: Principal
Posted: 2013-10-04 11:28:47
Posted from IP:

Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate

Teacher endorsement needed for automotive machining as skill sets differ from automotive technology.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Friday, October 11, 2013 2:08 PM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-11 14:08:03)

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Comment Received for Policy 5202

#####

Name: Scott Staley
Organization: Mineral County Schools
Title: Director
City/State: Keyser, WV
Role: School System Staff
Posted: 2013-10-11 14:08:03
Posted from IP:

Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate

7052 Welding – Under the required industry credentials for CTE Certification, instead of only reading SMAW and GMAW Plate, it should state SMAW and GMAW Plate in the 2G, 3G and 4G positions.

Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Friday, October 11, 2013 9:33 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-11 09:32:40)

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Comment Received for Policy 5202

#####

Name: Ryan Haught
Organization: Mid-Ohio Valley Technical Insitute
Title: Director
City/State: St. Marys, WV
Role: Principal
Posted: 2013-10-11 09:32:40
Posted from IP:

Comments for section APPENDIX C Required tests, Industry Credentials and Work Experience Required for Issuance of the Career/Technical Permit and Career/Technical Certificate

7083 Air Conditioning and Refrigeration - The first industry credential should be changed to Industry Competency Exams (ICE) and the Industry Credentialing Organization should be Industry Competency Exams (ICE) Certified Testing Center. The second should be changed to EPA Section 608 Technician Certification, Universal Certification with the Industry Credentialing Organization listed as EPA Certified Testing
Centerrnrn7105 Civil Technology – There should be an ‘or’ between the three credentials, ie: Certified Drafters – Architectural or Certified Drafters – Mechanical or Certified Drafters - Civil rnrn7164 Collision Repair – According to ICAR credentialing, corrections to the name of the ICAR areas required should remove Painting/Refinishing and only list Refinishing. rnrn7212 Computer Technology – Remove the two listings of CompTIA A+ Practical Applications and CompTIA A+ Networking Essentials since they no longer exist and replace them with CompTIA A+ and CompTIA Network+!
rnrn7131 Electronics Technology – The correct listing of the credential is CETa not CETA.rnrn7021 Carpentry, 7027 Facilities Maintenance and 7028 General Building Construction – The requirement to possess the Associated General Contractors License should be removed, as well as the credentialing organization.rnrn7070 Industrial Equipment Maintenance – Machining Level 1 should be removed as a required credential for these individuals. rnrn7023 Plumber and Pipefitter and 7052 Welding – To stay consistent, the ** comments should read Credential Required instead of Credential Required Prior to Being Hired



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VIA EMAIL & FEDERAL EXPRESS

October 14, 2013

Monica Beane, Ed.D
Interim Director
WVDE Office of Professional Preparation
Capitol Bldg. 6, RM. 252 1900 Kanawha Blvd.
East Charleston, WV 25305

RE: Proposed Rule Comments WVBE Policy 5202; 09/20/2013

Dear Dr. Beane:

The purpose of this letter is to - *once again* - express strong opposition to the unreasonably restrictive language of the proposed amendments to West Virginia State Board of Education ("Board") Policy 5202.

Proposed Rule

1. The Board's proposed amendments contain twenty (20) instances of language prescribing the private sector products of the American Heart Association®, Inc. ("AHA") and the American Red Cross ("ARC") as the only acceptable "Industry Credentialing Organizations".
2. The Board's proposed amendments strike current language permitting "other nationally recognized training programs" (**EXHIBIT A**).

Requested Amendments

1. Eliminate the proposed strikes that permit "other nationally recognized training programs", or alternatively, add the "American Safety and Health Institute" ("ASHI") and "MEDIC First Aid" to the rule as an acceptable "Industry Credentialing Organization".

Reasons

1. As previously stated in our July 10, 2012 (**EXHIBIT B**) and June 4, 2013 (**EXHIBIT C**) approved rule comments that resulted in the incorporation of language permitting "other nationally recognized training programs" (**EXHIBIT D**); promulgation and enforcement of the Board's proposed rule places

unfair and unreasonable restrictions on competition, penalizes licensees, and causes a loss of business.

We value, believe in, and promote successful completion of a legitimate CPR and first aid course as an important component in protecting safety and health. We value, believe in, and promote free and fair competition that does not adversely affect health and safety. We look forward to helping the Board protect the health and safety of the citizens of West Virginia. We strongly prefer a non-adversarial approach.

Respectfully,



Digitally signed by Ralph Shenefelt
DN: cn=Ralph Shenefelt, o=HSI,
ou=Strategic Compliance,
email=rshenefelt@hsi.com, c=US
Date: 2013.10.14 11:14:51 -04'00'

Ralph M. Shenefelt
Senior Vice President
Health and Safety Institute

Cc:

Gregory R. Ciottone, MD, FACEP, Medical Director, Health and Safety Institute
Bill Clendenen, MBA, Chief Executive Officer, Health and Safety Institute
Jeff Jackson, MBA, Chief Financial Officer & President, Health and Safety Institute
Jeff Lindsey, PhD, Chief Learning Officer, Health and Safety Institute
Steve Barnett, MBA, Vice President, Strategic Compliance
Kristal Langner, Regulatory Approval Specialist, Health and Safety Institute

Enclosures: Exhibits A-D

Trent Danowski

From: Karen Petitto <petitto@wwvc.edu>
Sent: Tuesday, October 15, 2013 1:37 PM
To: Trent Danowski; Robert Hagerman
Subject: Reading Specialists

Trent and Robert,

We have several students in a unique situation, who will be applying for certification in Elementary and Reading Specialist. They have taken or will take the Reading Specialist exam, 5301. Do these students also need to take new Reading test?

Please advise on these Praxis questions of the past week as soon as possible; we have students right in the middle of the process who are waiting for answers.

Thank you for your attention, Karen

--

Dr. Karen R. Petitto
Associate Professor and
Director of the School of Education
West Virginia Wesleyan College
59 College Avenue
Buckhannon, WV 26201
petitto@wwvc.edu



Dr. Monica Beane

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Tuesday, October 15, 2013 11:39 AM
To: mbeane@access.k12.wv.us
Subject: Comment Received for Policy 5202 (2013-10-15 11:38:34)

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Comment Received for Policy 5202

#####

Name: Mary Beckelhimer
Organization: Putnam County Schools
Title: Director of Technology
City/State: Winfield , WV
Role: School System Staff
Posted: 2013-10-15 11:38:34
Posted from IP:

Comments for section 126-136-11 Permits Issued to Professional Educators

11.9.C.1.LL - Technology System Specialists can renew the temporary authorization. The Technology System Specialists should be able to receive a permanent authorization instead of having to renew annually.
rnrn11.9.c.1.LL.1 - Why not 12 hours, which means two days? The trainings the state offers are usually two day trainings, and the extra 3 hours are always difficult to work out.

Comments for section 126-136-24 Advanced Credentials

24.4.A Technology Integration Specialists need to be able to have permanent credentials. While I agree that they need to keep up with the changes in technology, they should have the opportunity to become permanently certified at some point. The fact that they have to pay \$25 every year to keep their credentials is out of alignment with other advanced credentials. rnrn24.4.B.2 The required 40 hours of training for annual renewal of TIS credentials is out of alignment with other advanced credential. In our county, we don't have any full-time TIS. All of ours are teachers or librarians. They can't do the 40 hour of renewal during their regular employment day as a full-time TIS can. They must do the this time in the evening, on weekends, or in the summer. They are not compensated for their time or expenses for additional training.

Robert,

Looking at 5202 I don't see a Praxis exam listed for the Technology Education program. Was that missed or did something change?

thanks

Diana Dunn

Program Coordinator-Sr.

304-367-4242

304-367-4599 (fax)

Fairmont State University

340ED

Technology Education is not reflected in the Appendix E. Without this endorsement area, students who are currently enrolled in Fairmont State University's approved Technology Education program will not be eligible for licensure in West Virginia. Please explain why this endorsement was removed from policy and add it back to the Appendix E if possible.