

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

January 9, 2020-February 10, 2020

Action

A/S Comment was accepted and supports the proposed policy.

A/C Comment was accepted and resulted in changes to the proposed policy.

N Comment was not accepted.

Date	Commenter	Comments	Action	Rationale
§126-136-4. Definitions.				
2020-01-28 11:15:55	Richard Duncan Superintendent Roane County Schools Reedy WV	4.60.a defines a Restricted Short-Term Substitute as "a licensed educator." Would such an individual then be eligible for all rights and privileges held by an "educator" under current state laws and policies, i.e., the earning of experience credit "in the teaching profession," seniority as a substitute teacher (though little used, still there), pay on the professional scales, etc. These might be assumed, but may merit clarification.	A/C	Definition was revised to reflect it is a licensed individual.
§126-136-9. General Requirements and Dates Certain for Licensure.				
2020-01-17 13:57:36	Rondia J Smith Cross Lanes West	Allowing anyone with a two-year degree to substitute would be a laughable scenario if you weren actually serious. Cosmetologists, hair stylists, for example, go to school and focus only on their field of study. I, for one, have been hard pressed to find a hairstylists that can actually cut hair. What makes you think they would be good in the classroom with children when they haven had any training. Please rethink this and remove this part of the policy. A very bad idea to implement this.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.
§126-136-10. Licenses For Professional Educators.				

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2020-01-13 18:04:49	Kenneth E Jones Jr Taxpayer Berkeley Springs WV	All teachers should be licensed, and certified, and not be able to teach if they do not meet the requirements. I know there is a shortage of teachers, but we should not allow or pay individuals if they don meet the standards set. Its unfair to the children and we as taxpayers are not getting what we are paying for.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.
2020-01-28 11:15:55	Richard Duncan Superintendent Roane County Schools Reedy WV	10.4.d.2 is a good addition. This provision seems to have been little known previously.	A/S	Comment supports changes proposed in Policy 5202.
2020-01-28 11:15:55	Richard Duncan Superintendent Roane County Schools Reedy WV	10.11 (and others) are concerning. Rather than addressing failures to meet licensure criteria through exceptions, more consideration should be given to addressing these failures and/or examining criteria for necessity. If we have expectations then immediately draw in exceptions, it calls to question our expectations in the first place.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.
2020-02-05 14:59:41	Missy Spivy Associate Professor of Education WVU at Parkersburg Parkersburg WV	I have some concerns with using GPA and grades to meet the requirements for exemption since grades and grading scales are so variable between instructors and institutions.	A/C	Language will be clarified to outline exemptions.

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2020-02-10 14:16:00	Dale Lee WVEA President WVEA Charleston WV	for professional administrative certificates the "three years of management level experience" should be related to the field of public education and the public school program.	A/C	Reference was edited to clarify.
§126-136-11. Permits Issued to Professional Educators.				
2020-01-16 17:46:02	Jessica Criner Teacher AFT Saint Albans WV	Take out the part about allowing someone with an associates degree to be a substitute.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.
2020-01-23 09:36:46	Ron Pauley Certification Specialist KCS Kanawha WV	11.6.c.1 The Yearlong Residency Permit should read the same as the Student Teaching Permit in regards to the permit being used as a short term substitute permit. Residents should not have to pay for a short term substitute permit when a student teacher does not. I suggest the language be as follows: "A yearlong residency permit will serve as a short term substitute permit upon successful completion all approved program course requirements and successful completion of all required Praxis exams."	A/C	Comment was accepted to allow the change that a yearlong residency permit will act as the same as a Student Teaching Permit in regards to allowing an individual to substitute short-term for the life of the permit.
2020-01-23 14:35:37	Becky Tucker Teacher South Charleston WV	I do not agree with substitutes having only a 2 year degree. They should have a 4 year degree with an educational background to provide our children/students with the best possible education.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an

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				official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.
2020-01-24 10:02:15	Frank Barnett CTE Director Cabell County Schools Huntington WV	11.9 Eliminate the wording "approved industry Credential Program in 2.b 4.a and DD.3	A/C	Comment was accepted and policy will be changed to reflect WVDE approved Pedagogy coursework instead of industry credentials for the Future Leaders Program Authorization.
2020-01-28 11:15:55	Richard Duncan Superintendent Roane County Schools Reedy WV	11.1.g merits the same comment as 10.11.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.
2020-01-28 11:15:55	Richard Duncan Superintendent Roane County Schools Reedy WV	In 11.4.a, "three years of managements level experience" should likely be "three years of management level experience."	A/C	Typographical error was corrected.
2020-01-28 11:15:55	Richard Duncan Superintendent Roane County Schools Reedy WV	11.7.a.3.A and elsewhere recognizes that long-term substitutes who serve as teachers-of-record for a year or more will likely receive a significant amount of professional development and certainly much on-the-job training. This is a good addition.	A/S	Comment supports changes proposed in Policy 5202.

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<p>2020-01-28 11:15:55</p>	<p>Richard Duncan Superintendent Roane County Schools Reedy WV</p>	<p>11.7.h is the most concerning change to licensure in some time. From experience, "substitute shortages" are rarely just that. Instead, they are often more so shortages of qualified full-time teachers that result in vacancies which tie up substitutes (and require further substitutes when those substitutes need to take a day off). They can also be caused by severe attendance issues. Both of these factors should be given significant consideration before permitting teachers with less than a bachelors degree work as such in non-CTE classrooms, even as 10 days or fewer substitutes. The expectation for quality instruction is simply not there.</p>	<p>N</p>	<p>This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.</p>
<p>2020-01-28 11:15:55</p>	<p>Richard Duncan Superintendent Roane County Schools Reedy WV</p>	<p>As a further point on that section, given the</p>	<p>A/C</p>	<p>Changes were made to make these individuals eligible to Coach if they complete the WVSSAC required coursework.</p>

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		<p>definition as a "licensed educator," what is the motive behind not allowing such a permit to stand in place of a coaching authorization? If the concern is that the individual will not have had coaching-related training, then the same would hold for long- and short-term substitute permits and even most professional certificates not endorsed in areas like PE, Health, or Wellness. If the concern is that the restricted short-term substitute does not have some training or experience that a long- or short-term substitute has, when both are required to complete only the exact same substitute teaching training, then it begs the question why an associates degree is good enough to place one in a substitute teaching assignment but it takes a bachelors degree or better to skip the WVSSAC coaching training? I can understand if this was done simply to prevent prospective coaches from skipping the coaching training with no intention of ever being a short-term substitute teacher, so the optics may need focusing.</p>		
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<p>2020-01-28 11:15:55</p>	<p>Richard Duncan Superintendent Roane County Schools Reedy WV</p>	<p>11.7.h.3.B.1 presents an interesting twist on the above comments. I suppose this could be a way to help a career restricted short-term substitute earn a pathway to renewal that is not annual, but it does "muddy the waters." Perhaps a temporary/permanent structure or 3-year/5-year/permanent structure like other certificates would be more consistent.</p>	<p>N</p>	<p>Pathway does align with options provided to other credentials. This credential, as any other substitute permit, cannot become permanent or be valid beyond the 3 year period.</p>
<p>2020-01-28 11:15:55</p>	<p>Richard Duncan Superintendent Roane County Schools Reedy WV</p>	<p>11.9.e and other sections clarifying the eligible effective date for coaching authorization is a good addition.</p>	<p>A/S</p>	<p>Comment supports changes proposed in Policy 5202.</p>
<p>2020-01-28 11:32:24</p>	<p>Richard Duncan Superintendent Roane County Schools Reedy WV</p>	<p>11.7.j adds a "Contractor/Volunteer or Other School Personnel Permit" that does not appear to be in the Executive Summary nor in the Definitions. What is the purpose of this permit? Is it simply to give a vehicle for the same screening process to be</p>	<p>A/C</p>	<p>Language was clarified to state that this is an optional credential to be used by County School systems as needed to ensure individuals not employed by the County School system are properly vetted.</p>

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		applied to individuals not otherwise licensed? Will it be required of all not-otherwise-licensed individuals who work in schools perhaps unaccompanied (custodians, maintenance workers, outside vendors, etc)?		Counties have in place mechanisms for those who are employed in the County.
2020-01-28 11:50:52	Tammy Aliff Education Credential Specialist Marshall University Huntington WV	11.6 Check numbering 11.6.c.3 Needs clarification 11.6.c.4 Needs clarification	A/C	Comment was accepted and changes will be made to clarify the numbering and the language in this section.
2020-02-01 22:58:14	Jo Pennington Dean, College of Education Ohio Valley University Vienna WV	11.6.c.1 states that the Permit for Year-long Residency will be valid for one school year and expire on June 30. This will limit our students, depending on when they enter an EPPs program (Fall or Spring). Student teachers/residents need flexibility in this structure, to complete two residency semesters but, perhaps, not in the sequence of one complete school year. The configuration needs to allow fall/spring, spring/fall, fall/fall, or spring/spring. This will enable transfer students, athletes, people who can attend full-time every semester, and other scenarios to move into the first residency semester when needed, without having to wait for a fall semester. The language in 5202 states that the year-long residency is one complete school year. Does this mean that the residents are to be in the same school and placement for one full school-year? I believe it would benefit our residents greatly to be allowed to complete their residency semesters in two different age levels and classrooms in their certification areas. Also, it is overkill to require a person with a Permit for Year-long Residency to apply for a Short-term	A/C	Language will be clarified for the timeline of the Spring to Fall year-long residency.

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		Substitute Teaching Permit. Please let the Permit for Year-long Residency suffice for both purposes.		
2020-02-05 14:59:41	Missy Spivy Associate Professor of Education WVU at Parkersburg Parkersburg WV	<p>11.6.c.1 Some teacher candidates will need to do their residency spring to fall instead of fall to spring. To avoid penalizing them and making them pay for two permits, it would be good to allow for a form similar to Form 24A to be used to change the residency permit.</p> <p>11.6.c.4 Our institution currently requires ALL Praxis tests to be passed before student teaching in the SECOND semester of the senior year. It might be difficult to have ALL required tests passed BEFORE the FIRST semester of the senior year. Our institution had already planned to require passage of all tests before admission to residency but allowing one semester provisional admittance if one test was not passed.</p>	A/C	Language will be clarified for the timeline of the Spring to Fall year-long residency.
2020-02-10 14:16:00	Dale Lee WVEA President WVEA Charleston WV	<p>Year Long Residency. How does this allow for the classes that are normally taken the semester prior to student teaching? What is gong to be taken out of the college curriculum so the student may be in student has the year in residency?</p> <p>These programs are not answers to the teacher shortage and are simply designed to get people into the classroom more quickly not designed to get more people into the profession.</p>	N	Comment makes reference to elements which are delineated in a different WVBE policy.
2020-02-10 14:16:00	Dale Lee WVEA President WVEA Charleston WV	Restricted short-term Substitute Permit. This is a lowering of standards. The training and course work should occur on the front end not just for the renewal of the permit.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an

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§126-136-12. Early Childhood Classroom Assistant Teacher (ECCAT) Authorization and Paraprofessional Certification.				
2020-01-10 17:31:25	Leigh Aide Huntington Wv	we need the seniority start the day your start working as aide. This is unfair to special ed aide. Its unfair to special ed students because their aides don have ECCAT training.	N	Comment does not reflect proposed changes to Policy 5202 and would require a change to W.Va. State Code.
2020-01-28 11:15:55	Richard Duncan Superintendent Roane County Schools Reedy WV	This is a comment on 126-136-13. (It has no comment box because it has no changes proposed.) "EPP" is not defined. I believe it stands for "educator preparation program," but I could not find its definition in the Definitions section.	A/C	Term was edited to remove the abbreviation.
§126-136-20. Athletic and Limited Football Trainer.				
2020-01-28 11:15:55	Richard Duncan Superintendent Roane County Schools Reedy WV	20.4 specifies "any county employees" but WVC 18A-3-6 (b) and other similar provisions only mention "county superintendent." It would be more consistent to change 20.4 to specify it is the superintendents responsibility to report, perhaps with a provision that a county policy be in place to direct employees to report any such things to the county superintendent. (That provision could apply beyond trainers, of course.)	A/C	Language edited to align with 18A-3-6 as a result of Legislative audit.
§126-136-21. Additional Endorsement(s) for Existing License.				
2020-01-22 13:14:22	Melissa Kaiser Teacher Belington WV	Driver Education: For the proposal IF the program is a quality program to attract QUALITY instructors. It needs to have rigor.	N	Comment is a statement and does not propose any changes to be made.
2020-01-24 10:11:05	Robert Keaton CTE Director	Eliminate the verbiage in 11.9 or dd.4 "approved industry credential program"	A/C	Previous comment was received and policy changed for the correct section.

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	Fayette County Fayetteville WV			
§126-136-24. Advanced Credentials.				
Appendix A.				
2020-01-14 14:56:41	Andrew Harbert Bridgeport WV	Please lower the requirements to be exempt from the Praxis Core test. I believe if a student can get a 22 on the ACT, they have no need to take it and should be exempt.	A/S	This change was included on the proposed revisions and as such the comment supports the proposed changes to 5202.
2020-01-18 09:33:09	Teresa Teacher Kanawha County Schools South Charleston WV	Substitute teachers should be required to have, at a minimum, a four year degree. I began my teaching career in this manner and I believe we need to continue to maintain a high standard for those allowed to interact with our children. At that rate, even, the current substitutes I have experienced over the last year have been questionable and did not have my students' best interest at hand.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.
2020-01-18 09:57:34	Teresa Teacher Kanawha County Schools South Charleston WV	Substitute teachers should be required to have, at a minimum, a four year degree. I began my teaching career in this manner and I believe we need to continue to maintain a high standard for those allowed to interact with our children. At that rate, even, the current substitutes I have experienced over the last year have been questionable and did not have my students' best interest at hand.	N	This would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.

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2020-01-22 11:15:02	Gabriella Jarrett Assistant to the COEPD Dean/Licensure Marshall University South Charleston WV	Please note that General Integrated Math needs to be renamed Algebra I.	A/C	Comment was accepted and the name of the endorsement will be changed to Algebra I.
2020-01-22 12:31:06	Rachael Copley Teacher Kanawha County Schools Cross Lanes WV	Please remove paraprofessionals from this policy to ensure they will not end up as a substitute teacher.	N	The policy also addresses the licensure of paraprofessionals. Regarding the substitute teacher proposed language, this would be only in a restricted capacity to serve a very specific purpose for county school systems that are experiencing a critical shortage of substitutes. These individuals may only be eligible to be used in this capacity if the County submits an official waiver request to the State Superintendent and provide justification for such need. Minimum required training is a requirement prior the issuance of such credential and ongoing training required for its renewal.
2020-02-06 10:57:08	Ron Pauley Certification Specialist KCS Charleston WV	What are the grade levels for computer science discovery and computer science fundamentals.	A/C	Comment was accepted and grade levels will be adjusted for the two endorsements.