

**Policy 5202, Minimum Requirements for the Licensure of
Professional/Paraprofessional Personnel and Advanced Salary Classifications
Comment Log
October 16, 2020-November 16, 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
§126-136-1. General.				
§126-136-2. Summary.				
§126-136-3. Purpose.				
§126-136-5. Categories of Licenses.				
§126-136-6. Legal Basis for Licensure.				
2020-11-02 10:17:34	David Lancaster Chair WVU Parkersburg Parkersburg WV	6.2.D 6.2.D.1 We want to support the creation of these data bases. Define Designated Hearing Officer- Who is this person and what do they do?	A/S	Comment supports the change in policy. The State Superintendent may appoint anyone he/she selects to fulfill this role.
§126-136-7. Responsibilities for Licensure.				

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

§126-136-8. Teachers and Paraprofessionals in Federally Funded Programs.				
§126-136--9. General Requirements and Dates Certain for Licensure.				
§126-136-10. Licenses for Professional Educators.				
2020-10-21 10:55:40	Ronald Pauley Certification Officer Kanawha County Board of Education Charleston WV	10.9.a.2language for school nurse is not aligned with Nursing Board of Examiners and National language Nurses from a compact state without a WV RN License are eligible to practice in WV.	A/C	Policy will be changed to reflect the language of compact states from the Board of Nursing.
2020-11-16 11:25:17	Helen Southall Assistant Professor West Virginia State University Institute West	10.2.c.1.A add date of "NEW SAT" (after March 2016) and allow exemptions for math and/or English/reading from individual sections not necessarily attained from the same test attempt; take the highest scores from any category/any attempt.	A/C	Language will be clarified that exemptions do not need to be from a single test administration.
2020-11-16 14:57:09	Ron Pauley Certification Officer Kanawha County Board of Education Kanawha wv	1. The references throughout the policy are incorrect. 2. The exemptions need clarified throughout the policy and testing manual	A/C A/C	Policy references will be changed to reflect the correct citation. The exemptions will be clarified and moved to the testing directory.
2020-11-16 15:18:30	Pamela Schield Interim Dean School of Education Salem University Salem WV	In 10.2.c.1.A, what is the date for the ew SAT of 480 etc? Further, are those high school students able to take over one section of the SAT tests? Would the new test attempt pass scores be considered?	N	Comment submitted as a question. Clarification of exemptions will be made and moved to testing directory.
§126-136--11. Permits Issued to Professional Educators.				

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

<p>2020-10-19 09:18:44</p>	<p>Dallas W Plumley Army Senior Army Instructor Lincoln County Board of Education GRIFFITHSVILLE WV</p>	<p>JROTC Certification Process. Currently to be an Army JROTC instructor in the state of WV, I have to go through the Army Certification process and then once I find a school that will hire me, I pay the WVDE \$25 each year to teach. The state doesn't nothing except issue the permit on a yearly basis which causes more work for the state, county, and the instructor.</p> <p>I think the following change need to occur: Permits should be issued on a longer basis. It should follow the same rules as other, three years and then permanent once through the initial period. We have instructors out here that have 25+ years of experience teaching JROTC. We have JROTC instructors out here that have teaching degrees MA plus 45, a permanent teaching certificate, and certified as Principal and Superintendent but they still are required to follow the current policy of yearly renewal.</p> <p>Side note: Certification by the military is permanent until revoked because of failing to meet the certification requirements. The branch of services authorization to teach is permanent until they rescind it for not meeting the requirements of the certification which is a very thorough process. If permission is ever revoked the county and state is notified of the instructor's new status. Again, nothing being done by the state except taking money.</p> <p>We have enough trouble getting JROTC instructors to come to this state so making the process more</p>	<p>N</p>	<p>This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.</p>
--------------------------------	---	--	----------	--

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

		user friendly and appealing would allow us to sell the positions better and maybe get them all filled.		
2020-10-19 10:14:38	Charles Lucas Senior Army Instructor Mercer County Board of Education Princeton WV	Cadet Command requires JROTC Instructors to re-certify every five years. I believe the WV authorization should coincide with Cadet Commands re-cert.	N	This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.
2020-10-19 10:59:15	Henry Luke Senior Aerospace Science Instructor (AFJROTC) Cabell Midland High School Ona WV	JROTC permits should be issued on a longer basis. The individual service branches certify JROTC instructors, and that certification is permanent, unless revoked due to cause. If certification is revoked, the county and state are immediately notified of the instructor's new status. Based on the unique status of JROTC instructors I propose the following: Three-year initial certificate, then permanent permit to teach JROTC subject to continued certification by their service branch.	N	This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.
2020-10-19 12:01:18	Phillip A Suydam Senior Aerospace Science Instructor Jefferson High School AFJROTC Shepherdstown WV	Permits issued to JROTC Instructors should follow the same rules as other teachers, three years and then permanent once through the initial period. All JROTC Instructors have already been trained and certified by their respective Services, and many hold advanced degrees. Further there are instructors out here that have 25+ years of experience teaching JROTC but they still are required to follow the current policy of yearly renewal. I would think the paperwork and cost associated with annual renewal costs more than \$35 the state collects every year. My biggest fear is somehow	N	This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.

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

		<p>overlooking this annual requirement and being decertified.</p> <p>We have enough difficulty filling open JROTC positions in this state so making the process more user friendly and appealing may assist in luring qualified candidates.</p>		
<p>2020-10-19 12:12:19</p>	<p>MAJ (Ret) T. Brad McGee Senior Army Instructor George Washington HS Charleston WV</p>	<p>Currently to be an Army JROTC instructor in the state of WV, I have to go through the Army Certification process and then once I find a school that will hire me, I pay the WVDE \$25 each year to teach. The state does nothing except issue the permit on a yearly basis, which causes more work for the state, county, and the instructor(s).</p> <p>I think the following change need to occur:</p> <p>Permits should be issued on a longer basis. It should follow the same rules as others, three years and then permanent once through the initial period or something similar to that. We have instructors out here that have 25+ years of experience teaching JROTC. We have JROTC instructors out here that have teaching degrees MA plus 45, a permanent teaching certificate, and certified as Principal and Superintendent, but they still are required to follow the current policy of yearly renewal.</p> <p>Side note: Certification by the military is</p>	<p>N</p>	<p>This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.</p>

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

		<p>permanent until revoked because of failing to meet the certification requirements. The service branch grants authorization to teach, which is permanent until they rescind it for not meeting the requirements of the certification which is a very thorough process. If permission is ever revoked the county and state is notified of the instructor's new status. Again, nothing being done by the state except taking money.</p> <p>We have enough trouble getting JROTC instructors to come to this state so making the process more user friendly and appealing would allow us to sell the positions better and maybe get them all filled.</p>		
2020-10-19 13:53:30	George J. Morris Aerospace Science Instructor Air Force JROTC Shenandoah Junction WV	<p>Dear State BOE Representatives,</p> <p>Permits issued to JROTC Instructors should follow the same rules as other teachers, three years and then permanent once through the initial period.</p> <p>All JROTC Instructors have already been trained and certified by their respective Services, and many hold advanced degrees. Further there are instructors out here that have 25+ years of experience teaching JROTC but they still are required to follow the current policy of yearly renewal. I would think the paperwork and cost</p>	N	<p>This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.</p>

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

		<p>associated with annual renewal costs more than \$35 the state collects every year. My biggest fear is somehow overlooking this annual requirement and being decertified.</p> <p>We have enough difficulty filling open JROTC positions in this state so making the process more user friendly and appealing may assist in luring qualified candidates.</p> <p>Thanks for your consideration.</p>		
2020-10-19 14:00:20	Michael Langdon Aerospace Science Instructor Air Force JROTC Shenandoah Junction WV	<p>Permits issued to JROTC Instructors should follow the same rules as other teachers, three years and then permanent once through the initial period. All JROTC Instructors have already been trained and certified by their respective Services, and many hold advanced degrees. Further there are instructors out here that have 25+ years of experience teaching JROTC but they still are required to follow the current policy of yearly renewal. I would think the paperwork and cost associated with annual renewal costs more than \$35 the state collects every year. My biggest fear is somehow overlooking this annual requirement and being decertified.</p> <p>We have enough difficulty filling open JROTC positions in this state so making the process</p>	N	<p>This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.</p>

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

		more user friendly and appealing may assist in luring qualified candidates.		
2020-10-21 07:40:08	Major William Park SASI Nitro High School (AFJROTC) Nitro WV	<p>Concur with LTC Plumley (Lincoln Co. High School):</p> <p>"Permits should be issued on a longer basis. It should follow the same rules as other, three years and then permanent once through the initial period or something similar to that. We have instructors out here that have 25+ years of experience teaching JROTC. We have JROTC instructors out here that have teaching degrees MA plus 45, a permanent teaching certificate, and certified as Principal and Superintendent but they still are required to follow the current policy of yearly renewal.</p> <p>Side note: Certification by the military is permanent until revoked because of failing to meet the certification requirements. The branch of services authorization to teach is permanent until they rescind it for not meeting the requirements of the certification which is a very thorough process. If permission is ever revoked the county and state is notified of the instructor's new status. Again, nothing being done by the state except taking money.</p> <p>Note: We have enough trouble getting JROTC instructors to come to this state so making the process more user friendly and appealing would allow us to sell the positions better and maybe get them all filled."</p>	N	This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.

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

<p>2020-10-23 11:52:44</p>	<p>Lefty Smith JROTC Instructor Greenbrier County Schools Ronceverte WV</p>	<p>Permits should be issued on a longer basis. It should follow the same rules as others, three years and then permanent once through the initial period or something similar to that. We have instructors out here that have 25+ years of experience teaching JROTC. We have JROTC instructors out here that have teaching degrees MA plus 45, a permanent teaching certificate, and other professional certifications and degrees but they still are required to follow the current policy of yearly renewal.</p>	<p>N</p>	<p>This authorization is not eligible for permanent status because additional on-going training is required through the armed services. Therefore, it must be issued on an annual basis.</p>
<p>2020-11-12 21:37:31</p>	<p>Barbara B Brady President Inspiring Dreams Network Hurricane WV</p>	<p>In order to better prepare substitute teachers for work with children, and better support the whole child multi-tiered system of support, to include those impacted by trauma, trauma-informed training should be added to substitute preparation hours. 126-136-11 Permits Issued to Professional Educators 11.7.a.3.A. Wording regarding "trauma-informed best practices" in the 18 hours of training should be added after "suspected child abuse" in order to add this requirement to the substitute required training. 11.7.b.1. after "teaching strategies" add wording to include "and trauma-informed best practices" 11.7.c.3.A. Add wording "and trauma-informed best practices" after "suspected child abuse" in 18 hour training requirement 11.7.d.1. Add wording "and trauma-informed best practices" after "teaching strategies" in</p>	<p>A/C</p>	<p>Substitute training will be changed to include the multi-tiered system of support.</p>

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

		<p>the 12 hour renewal training requirement 11.7.f.2.B. Add wording "and trauma-informed best practices" after "suspected child abuse" in 12 hour training requirement 11.7.g. Add wording "and trauma-informed best practices" after "teaching strategies" in the 12 hour renewal training requirement 11.7.h.2.A. Add wording "and trauma-informed best practices" after "suspected child abuse" in 18 hour training requirement 11.7.h.3.A. Add wording "and trauma-informed best practices" after "teaching strategies" in the 12 hour renewal training requirement</p>		
2020-11-16 15:18:30	Pamela Schield Interim Dean School of Education Salem University Salem WV	IN 11.7.H.3.B.1. states ...obtain scores from California Achievement test?	N	Comment was submitted as a question.
§126-136-12. Early Childhood Classroom Assistant Teacher (ECCAT) Authorization and Paraprofessional Certification.				
2020-11-12 21:37:31	Barbara B Brady President Inspiring Dreams Network Hurricane WV	<p>12.5.d. add "including trauma-informed best practices" after "learning activities" for 15 clock hours training 12.5.g.3. add "including trauma-informed best practices" after "learning activities" for 15 clock hours training</p>	A/C	Training will be modified to include trauma informed best practices.
§126-136-13. Grade Level Expansion.				
2020-11-12 21:37:31	Barbara B Brady President Inspiring Dreams	14.2 Add wording "and trauma-informed best practices" after "suspected child abuse" under initial six clock hours	A/C	Training will be modified to include trauma informed best practices.

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

	Network Hurricane WV			
§126-136-14. Waivers and Extensions.				
§126-136--15. Alternative Routes to Certification.				
§126-136-16. Out-of-State Applicants.				
§126-136-17. Non-United States Citizen.				
§126-136-18. Appropriate Assignments According to Licensure.				
2020-10-21 10:55:40	Ronald Pauley Certification Officer Kanawha County Board of Education Charleston WV	With Prek-K Special Needs is an individual eligible to teach kindergarten outside of special education.	A/C	Policy will be revised to reflect W.Va. State Code clarifying the assignment of individuals with a Pre-School Special Needs endorsement and teaching grade levels.
2020-10-23 15:32:11	Deborah Smith Professional Personnel Manager Cabell County Schools Huntington WV	A person who has a Pre-School Special Needs endorsement cannot teach kindergarten due to the fact their specialization is in special needs specifically for the pre-school level. Even though the assigned grade levels indicate PK-K, the intent is for those special needs students within the preschool classroom (who may be at the kindergarten age) to receive the additional support needed as per their IEP.	A/C	Policy will be revised to reflect W.Va. State Code clarifying the assignment of individuals with a Pre-School Special Needs endorsement and teaching grade levels.

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

2020-11-02 10:17:34	David Lancaster Chair WVU Parkersburg Parkersburg WV	18.8- Perhaps add something to assist in getting the best individual for this situation. The individual needs to receive recommendation from the Education Prep Unit within the institution and be approved by the Superintendent from the host County.	N	The process already requires institutional approval. Individuals holding the permit have already received county superintendent approval.
2020-11-16 15:18:30	Pamela Schield Interim Dean School of Education Salem University Salem WV	In 18.20, appreciate the definition of an Athletic Trainer Authorization in 126-136-20.2. In 18.21, another word for rainer in defining football trainer could be very helpful in distinguishing the language associated with their responsibilities. As noted in 126-136-20 this language must be defined to assign proper levels of due diligence health care to avoid lawsuits. Unfortunately, the term rainer does not convey differences between what the athletic trainer does. If perhaps use of Football Medical Assistant might designate proper language to duties needs. IN 18.22. Please clarify the duties of an athletic coach. Is the expectation of a physical therapist be a coach? This does not appear to be the case in 18.21	N	Comment does not address proposed changes in Policy 5202.
§126-136-19. Special Education.				
§126-136-§126-136-20. Athletic and Limited Football Trainer.				

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

2020-10-21 10:55:40	Ronald Pauley Certification Officer Kanawha County Board of Education Charleston WV	The NATABOC name has changed.	A/C	Policy will be changed to reflect the new name of Board of Certification, Inc. for Athletic Trainers.
2020-11-16 15:18:30	Pamela Schield Interim Dean School of Education Salem University Salem WV	In 20.1, see above comments in 126-136-18 in defining football trainer to Football Medical Assistant. In 20.3, Certified athletic trainers are also required to renew their certifications every 3 years through the NATABOC.	N	Comment does not address proposed changes to Policy 5202.
§126-136-21. Additional Endorsement(s) for Existing Licensure.				
2020-10-21 10:55:40	Ronald Pauley Certification Officer Kanawha County Board of Education Charleston WV	The Accident Prevention Bureau - is the entity still in existence.	A/C	The Accident Prevention Bureau will be deleted as the Department of Motor Vehicles provides the necessary documentation.
2020-11-16 11:25:17	Helen Southall Assistant Professor West Virginia State University Institute West	21.2 There is no section 9.4.c.1 to refer to for exemptions added by content proficiency; All special education endorsements should require some coursework (and the coursework specified); more clarification around WVDE approved methodology coursework. As a former special education teacher (certified LD, MI, BD including Autism) I actually took courses in all areas as well as doing separate student teaching in each area. I have so worked with special ed teachers with multicat endorsement and/or those who simply took the PRAXIS. It is difficult enough for those with multicat, much less those who have no coursework in the field.	N	Policy already includes provision for necessary coursework as it relates to adding an endorsement.

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

2020-11-16 15:18:30	Pamela Schield Interim Dean School of Education Salem University Salem WV	In 21.8, clarification individuals can use the WVBE exam scores (Praxis 5412 exam) OR not take the exam, because they have 5 years experience to add the endorsement?	N	The statement is presently included and explained in Policy 5202 under adding an additional endorsement to an existing Administrative endorsement.
§126-136-22. Salary Classifications for Educators.				
2020-11-10 11:12:29	Doug Sands Instructor United Technical Center Clarksburg WV	There is no prevision for Doctorate pay under Career Technical Education	N	The language is already present in Policy 5202.
§126-136-23. Fee Reimbursements and Salary Supplements.				
2020-10-22 15:51:10	Jenna Williams Curriculum Specialist Harrison Co BOE Clarksburg WV	The Policy needs to reflect reimbursement for teachers who are recertifying under the current Maintenance of Certification which occurs every 5 years.	N	Due to a Legislative Mandate, all reimbursement monies must go to shortage area applications first. To date, there has not been any annual funding remaining to pay renewal option applications.
2020-11-16 15:18:30	Pamela Schield Interim Dean School of Education Salem University Salem WV	In 23.3, certified athletic trainers also need to update their certifications every 3 years as do other medical professionals listed. Has this group been involved in this reimbursement schedule?	N	Athletic trainers not currently eligible for reimbursement as only those completing coursework in critical need areas holding a professional Teaching Certificate are eligible.
§126-136-24. Advanced Credentials.				
§126-136-25. Charter School Teaching Certification.				
2020-11-16 15:18:30	Pamela Schield Interim Dean School of Education Salem University Salem WV	Are the credentials to seek charter school certification equal to that of requirements to meet other teaching certifications?	N	While there is some latitude to charter schools regarding licensure qualifications, all individuals providing instruction must demonstrate academic or occupational qualifications or experiences that

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

				reasonably indicate they are competent to provide the instruction for which they are hired.
§126-136-26. Severability.				
§126-136-Appendix A. Programmatic Levels and Specializations Recognized on the Professional License.				
2020-10-21 10:55:40	Ronald Pauley Certification Officer Kanawha County Board of Education Charleston WV	Grade level extensions not included in the proposed appendix.	A/C	Grade level extensions will be added to Appendix A.
§126-136-Appendix B. Endorsements Eligible For The Permanent Authorization Of Grade Levels				
Repeal of §126-118, Policy 5112, Athletic and Limited Football Trainers in the Public Schools of West Virginia				