

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

April 13, 2023 – May 13, 2023

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 |
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| §126-136-1. General. | | | | |
| 2023-04-28 13:07:51 | Bryan Murphy Senior Army Instructor Riverside H.S (JROTC) Belle WV | JROTC Instructor are not considered teachers. All instructors have a bachelors degree and all officers have an masters degree. We are certified by the United States Army Cadet Command to teach several subjects. Each year the JROTC instructors have to pay for temporary teaching certificate. The instructors need to be considered full time teachers and pay for their certification once every 3-5 years. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| 2023-05-01 09:41:37 | William T. Longanacre JROTC Instructor Monroe County Schools ALDERSON WV | JROTC Instructors maintain their certifications through the US Army Cadet Command and therefore should not be required to renew their WV Teacher Certification annually after the first three years probationary period. After, that I believe that JROTC Instructors should have to renew their State License every three to five years; not every year since the Department of Defense already has annual requirements to maintain JROTC Instructor credentialing. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
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| §126-136-2. Summary. | | | | |

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| 2023-05-01 09:41:37 | William T. Longanacre JROTC Instructor Monroe County Schools ALDERSON WV | JROTC Instructors maintain their certifications through the US Army Cadet Command and therefore should not be required to renew their WV Teacher Certification annually after the first three years probationary period. After, that I believe that JROTC Instructors should have to renew their State License every three to five years; not every year since the Department of Defense already has annual requirements to maintain JROTC Instructor credentialing. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| §126-136-3. Purpose. | | | | |
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| §126-136-4. Definitions. | | | | |
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| §126-136-5. Categories of Licenses. | | | | |
| 2023-04-27 08:41:38 | Dallas W Plumley JROTC Instructor Lincoln County Hamlin West | Recommend changing the JROTC yearly requirement to a three or five year permit. WV Dept of Education does nothing toward certifying JROTC instructors except charge 35 a year for a permit. The branches of the services (Army, Navy, Air Force, and Marines) do all the certifying and once certified you are good to go until you decide to retire or resign. The services all have a certification process to go through and retraining to maintain the skills needed to be an instructor to include training conferences, online learning, and resident courses for rookie and experienced instructors. My case is a good example. I am a certified teacher with a permanent certificate for business education, safety, and administration (Principal and | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |

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| | | Superintendent) but yet every year I have to pay 35 bucks to be a JROTC instructor. | | |
| 2023-04-27 09:02:56 | Robert Stickler JROTC Instructor LCHS Hamlin WV | Please consider and approve allowing JROTC Instructors to change our annual fee of renewing our licenses to at least every 3 or 5 years. We are certified through the U.S. Army, I do not fully understand why we need to pay \$35 a year to keep renewing our licenses. Thank you for your time and consideration in this matter. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| 2023-04-27 09:04:49 | T. Brad McGee JROTC-Senior Army Instructor KCS-GWHS-JROTC Charleston WV | JROTC Instructors should not have to pay the annual \$35.00 to renew their teaching license. This requirement should be waived for all JROTC Instructors throughout WV or the license should be granted for a five year period. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| 2023-04-27 10:45:21 | Gerald Damron Senior Army Instructor Spring Valley High School Huntington WV | JROTC License requirement every year, with \$35 fee, is too excessive. JROTC Instructors are certified by Cadet Command and are recertified every five years. WV State Code should also reflect this cycle in licensure. Further, the management overhead for sending notices, time required by administrators to track signatures for notifications far exceeds the worth of renewing every year. Recommend changing to every five years. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| 2023-05-01 07:08:54 | Kevin Scott Bartlett Dr JROTC Beaver WV | JROTC License renewals at \$35 per year seems a bit excessive. We are certified/licensed through the US Air Force and need the same annual learning requirements of other teachers plus all of the monthly/annual Air Force requirements. This should be waived or shifted to a 3 or 5 year fee structure vs annual. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| 2023-05-01 07:11:57 | Jason Morris Senior Master Sergeant (Ret) | As a JROTC Instructor, we are required through the WV Dept of Education to renew our Teaching Certificate Annually. This has always been a point | N | ROTC instructors have progression requirements at different intervals through the armed services which would |

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| | Jefferson HS JROTC Shenandoah Junction WV | of contention--can this be streamlined to match other teaching departments--perhaps renew every 3-5 years? | | exceed the validity period of an authorization. |
| 2023-05-01 08:13:09 | THOMAS J. FRANCIS JR. JROTC INSTRUCTOR TOLSIA HIGH SCHOOL FORT GAY WV | I have been a JROTC Instructor for the state of WV since July of 2011. Yearly, I fill out an application for temporary license and pay a fee for the upcoming school year. I feel that the licensure should be a five year process and after 10 years it should be a permanent certification. Thank you for your time and consideration. GOD Bless, TJ Francis | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| 2023-05-01 09:08:56 | Lefty W Smith Instructor GEHS JROTC Lewisburg WV | JROTC Instructors should not be required to pay for annual recertification. Army Instructors are required to have a four year degree prior to hiring in addition to the required courses and in person instructor certification completed at Fort Knox Kentucky. In addition to having 20 plus years' experience providing purpose, direction, and motivation to soldiers. Their classroom strategies and plan for executing the learning plans provided by Cadet Command are nationally accredited and each program goes through individual program accreditation every three years. The focus of the education plan is on core abilities. Apply critical thinking techniques, Build your capacity for life-long learning, communicate using verbal, non-verbal, visual, and written techniques, Do your share as a good citizen in your school, community, country, and the world, Take responsibility for your actions and choices, Treat self and others with respect. In addition to that the retired senior noncommissioned officers and officers in the JROTC programs bring a wealth of experience in the area of mentoring, counseling, and being a role model that far exceed that of the average teachers who | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |

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| | | gets their degree at 22 or 23 years of age without any real world proven talents other than passing a Praxis for their prescribed field of study. JROTC instructors bring their proven leadership experience, communication and problem solving skills, and the expertise of their career of service to our country to the schools and communities they serve. | | |
| 2023-05-01 11:33:02 | Matthew Francis Senior Army Instructor Tolsia HS JROTC Fort Gay WV | I have been a JROTC Instructor in WV for 3 years and previously KY for 6 years. I believe that we should adopt a requirement more like KY, where your initial license is good for 3 years and then every 5 years for then on. I, also, think that the WV license should be permanent after 10 years. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| 2023-05-02 07:19:34 | Phillip Suydam Senior Aerospace Science Instructor Jefferson High School AFJROTC Shenandoah Junction WV | Junior ROTC Instructors currently teach on provisional licenses that have to be renewed annually. Not only is there a cost involved (\$35) but it is an unnecessary process. JROTC Instructors are certified by their respective services to teach this program and many hold advanced degrees. We should be recognized as teachers, the same as our colleagues, and should not have to go through an annual bureaucratic process just to maintain our positions. This is an easy fix and should be undertaken as soon as possible. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
| 2023-05-02 16:12:20 | Charles Lucas Senior Army Instructor Princeton High School Princeton West | JROTC Instructors are currently required to renew their their license each year at \$35. each time. Cadet Command requires Instructors to recertify every five years. In my opinion the licensure should match the certification. If a school district elects to terminate employment of an Instructor, Cadet Command will decertify the instructor. So I see no | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |

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| | | need for instructor to reapply for licensure annually. | | |
| §126-136-6. Legal Basis for Licensure. | | | | |
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| §126-136-7. Responsibilities for Licensure. | | | | |
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| §126-136-8. Teachers and Paraprofessionals in Federally Funded Programs. | | | | |
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| §126-136-9. General Requirements and Dates Certain for Licensure. | | | | |
| 2023-05-01 09:41:37 | William T. Longanacre JROTC Instructor Monroe County Schools ALDERSON WV | JROTC Instructors maintain their certifications through the US Army Cadet Command and therefore should not be required to renew their WV Teacher Certification annually after the first three years probationary period. After, that I believe that JROTC Instructors should have to renew their State License every three to five years; not every year since the Department of Defense already has annual requirements to maintain JROTC Instructor credentialing. | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |
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| §126-136-10. Licenses for Professional Educators. | | | | |
| 2023-04-21 09:25:24 | Susan Cookus Human Resources Coordinator Berkeley County Schools Martinsburg WV | 10.4.a.3 appears to be in a wrong location for the subject matter. | A/C | Policy will be corrected to fix this error. |

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| 2023-05-04 14:52:59 | Ronald Pauley HR Executive Director Kanawha County Board of Education Charleston WV | NBPTS does not require experience of 5 years to go permanent. | A/C | Policy will be changed to reflect that experience is not required to receive a permanent certificate with NBPTS. |
| 2023-05-08 16:20:12 | Sandra S Stroebel Associate Dean/Professor Marshall University S Charleston WV | Please add the EdS as a recognized degree. The EdS is the required degree for School Psychologists by the National Association of School Psychologists. If students in the program earn only the EdS, they would be paid at a bachelors level. It would help us with programming and recruitment, if students did not have to obtain a MA in addition to the EdS degree, since the EdS is already beyond the MA and is required to be 60 hours. | A/C | Recognition of an Ed.S. as a Degree class would require legislative change. However, recognition of eligible degrees where allowable for issuance of a certificate was changed. |
| 2023-05-12 | Carol Hamric Community Member | What's difference between Provisional Alternative in 10.1.d and in 15.3? | A/C | Policy will be amended to clarify the distinction between the types of certificates and requirements for issuance. |
| §126-136-11. Permits Issued to Professional Educators. | | | | |
| 2023-04-14 15:32:17 | Denise Fletcher Director of Personnel & HR Randolph County | 11.11.v. Initial Authorization for Professional Accountant or School Business Official (refer to section 10.12). Section 10.12 is a typo. Should be section 10.6 - Other certificates | A/C | The error will be corrected to point to the correct section. |

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| | Schools Elkins West | | | |
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| 2023-05-15 10:41:51 | Jason Kamlowky Director, HR Berkeley County Martinsburg WV | My only comment here is that we need to reconsider the qualifications for becoming a substitute teacher. Maryland currently offers people with a high school diploma the chance to sub and with our shortage in Berkeley we could use additional help. | N | High School Diploma does not meet the minimum requirements of licensure. |
| §126-136-12. Early Childhood Classroom Assistant Teacher (ECCAT) Authorization and Paraprofessional Certification. | | | | |
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| §126-136-13. Grade Level Expansion. | | | | |
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| §126-136-14. Waivers and Extensions. | | | | |
| 2023-05-01 09:41:37 | William T. Longanacre JROTC Instructor Monroe County Schools ALDERSON WV | JROTC Instructors maintain their certifications through the US Army Cadet Command and therefore should not be required to renew their WV Teacher Certification annually after the first three years probationary period. After, that I believe that JROTC Instructors should have to renew their State License every three to five years; not every year since the Department of Defense | N | ROTC instructors have progression requirements at different intervals through the armed services which would exceed the validity period of an authorization. |

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| | | already has annual requirements to maintain JROTC Instructor credentialing. | | |
| §126-136-15. Alternative Routes to Certification. | | | | |
| 2023-05-12 | Carol Hamric Community Member | Confusion with Provisional Alternative in 10.1.d. | A/C | Policy will be amended to clarify the distinction between the types of certificates and requirements for issuance. |
| §126-136-16. Out-of-State Applicants. | | | | |
| 2023-04-21 09:25:24 | Susan Cookus Human Resources Coordinator Berkeley County Schools Martinsburg WV | 16.2.a should be five years of full-time experience, not three. 16.2.9 Why do Evaluations need to be submitted? | A/C | Policy will be corrected to fix both errors. |
| §126-136-17. Non-United States Citizen. | | | | |
| §126-136-18. Appropriate Assignments According to Licensure. | | | | |
| 2023-04-26 13:23:52 | Michelle Principe Certification Officer WVU Morgantown WV | Restricted Clinical Experience permits should allow a candidate to substitute as short-term substitute until the expiration date of the permit just like Clinical Experience Permit and Residency Permit candidates once the requirements are met. | A/C | Policy will be changed to reflect Restricted Clinical Experience Permits can be used as a Short-Term Sub Permit. |
| §126-136-19. Special Education. | | | | |
| §126-136-20. Athletic and Limited Football Sports Trainer. | | | | |

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| §126-136-21. Additional Endorsement(s) for Existing Licensure. | | | | |
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| §126-136-22. Salary Classifications for Educators. | | | | |
| 2023-04-18 11:34:42 | Matthew Call Director United Technical Center Clarksburg WV | Please change the policy statement to say the following: A Licensed Practical Nurse holding a CTE Certificate or permit may qualify for the MA+45 vocational salary classification based on the awarding of a BA from a regionally accredited IHE. | A/C | Policy will be changed to allow for the CTE MA+45 for LPN on a CTE certificate. |
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| §126-136-23. Fee Reimbursements and Salary Supplements. | | | | |
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| §126-136-24. Advanced Credentials. | | | | |
| 2023-05-10 17:27:51 | Christy Dean Teacher (CTE) Buckhannon-Upshur High School Buckhannon WV | Need to establish consistency between transitions with other ares. Eliminate the 5 days and keep WVDE approved training. Currently there is a 5 day training available, but what happens if that availability goes away. There are also wonderful FREE resources that could be utilized to obtain credentials. (Next Gen Personal Finance) | A/C | Professional learning requirements were revised and eligible exemptions were added. |
| 2023-05-15 10:41:51 | Jason Kamlowky Director, HR Berkeley County Martinsburg WV | The following link was provided: https://wcpshr.com/sites/wcpshr.com/files/documents/WCPS%20Teacher%20Salary%202022-2023.pdf | N | Raising minimum salaries would require legislative action. |
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| §126-136-25. Charter School Teaching Certification. | | | | |
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| §126-136-26. Severability. | | | | |

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| Appendix A: Programmatic Levels and Specializations Recognized on the Professional License Certificate | | | | |
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| Appendix B: Endorsements Eligible for the Permanent Authorization of Grade Levels | | | | |
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W. Va. 126CSR136, Policy 5202, Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classifications
Comment Response Form

Comment Period Ends: May 15, 2023

NOTICE: Comments, as submitted, shall be filed with the West Virginia Secretary of State's Office and open for public inspection and copying for a period of not less than five years.

The following form is provided to assist those who choose to comment on Policy 5202: Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classifications.

Name: Carol Hamric Organization: _____

Title: _____

City: Charleston State: WV

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> Superintendent | <input type="checkbox"/> Higher Educator | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input checked="" type="checkbox"/> Community Member |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Other |

| COMMENTS/SUGGESTIONS |
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| §126-136-1. General. |
| §126-136-2. Summary. |
| §126-136-3. Purpose. |
| §126-136-4. Definitions. |
| §126-136-5. Categories of Licenses. |
| §126-136-6. Legal Basis for Licensure. |
| §126-136-7. Responsibilities for Licensure. |
| §126-136-8. Teachers and Paraprofessionals in Federally Funded Programs. |

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| §126-136-9. General Requirements and Dates Certain for Licensure. |
| §126-136-10. Licenses for Professional Educators. <i>What's the difference between Provisional Alternative in 10.1.d. and in 15.3?</i> |
| §126-136-11. Permits Issued to Professional Educators. |
| §126-136-12. Early Childhood Classroom Assistant Teacher (ECCAT) Authorization, Paraprofessional Certification, and Aide V/VI Assistant Teacher. |
| §126-136-13. Grade Level Expansion. |
| §126-136-14. Waivers and Extensions. |
| §126-136-15. Alternative Routes to Certification. <i>Confusion with Provisional Alternative in 10.1.d.</i> |
| §126-136-16. Out-of-State Candidates. |
| §126-136-17. Non-United States Citizen. |
| §126-136-18. Appropriate Assignments According to License. |
| §126-136-19. Special Education. |
| §126-136-20. Athletic and Limited Sports Trainer. |
| §126-136-21. Additional Endorsement(s) for Existing Certificate. |
| §126-136-22. Salary Classifications for Educators. |
| §126-136-23. Fee Reimbursements and Salary Supplements. |

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| §126-136-24. Advanced Credentials. |
| §126-136-25. Severability. |
| Appendix A: Programmatic Levels and Specializations Recognized on the Professional Certificate |
| Appendix B: Endorsements Eligible for the Permanent Authorization of Grade Levels |

Please direct all comments to:

Brad A. Fittro, M.A., Coordinator
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