**RSAI Testimony: Charter School Administrator Credential Proposed Rules**

**ARC 5936C** <https://www.legis.iowa.gov/docs/aco/arc/5936C.pdf> **Oct. 26, 2021**

Thank you to members of the Board of Education Examiners for considering stakeholder input concerning this proposal: **New rule 282 – 22.13(272) Text follows at the conclusion of these comments**

The Rural School Advocates of Iowa, composed of 146 Iowa public school districts geographically dispersed from around the state, provides the following comments regarding the subject rules proposal. RSAI is very concerned about the lack of criteria for obtaining a charter school administrator credential as proposed in these rules. RSAI and other education stakeholders specifically requested an administrator credential to confirm qualification of an administrator to lead a charter school. Charter school leadership may require different skills than traditional school leadership, which we acknowledge, but some demonstration of possessing those skills, whether through experience or postsecondary degree, is critical for the safety and success of children attending an Iowa charter school.

**Background:**

HF 813, Charter Schools, enacted in the 2021 Session, as amended by HF 847 Education Flexibility, included three possible routes to be a credentialed charter school administrator; 1) licensure for school administration, 2) teacher licensure and 3) an alternative charter school authorization to be established by the BOEE, which is why these rules are being promulgated.

For this third option, the proposed rules state only two requirements; complete a background check and have verification from a charter school governing board of a job offer. Additionally, confirmation of completing the child and dependent adult abuse trainings as stated in Administrative Code 282—subrule 20.3(4) is not verified until renewal of the license five years later.

Additionally, as there is no requirement to elect or vet the governing board members of a proposed charter school, only half of whom are required to live in the geographic region in which the charter school is located, it is even more critical to set a high standard for a charter school administrator without school leadership experience or chapter 272 licensure.

**Concern:**

We encourage the BOEE consider additional criteria for the charter school administrator authorization:

* BA degree or other postsecondary credential demonstrating a sufficient level of education
* Experience in leadership, management and evaluation of employees in an organization of at least similar size
* A credit check in addition to the regular background checks since charter schools typically involve fundraising and additional money management without as much oversight as public schools (charters are not required to have a licensed school business official)
* A national license search to ensure the applicant did not have a teacher, coach or administrative license in another state (or in Iowa) that was pulled for any ethical violation or compliance shortfall
* Require proof of completing the child and dependent adult abuse trainings referenced above within the first year of employment
* Requirements for continuing education units (CEUs) related to the administrator’s job responsibilities in addition to evaluator training

Thank you for the opportunity to comment.

RSAI Contacts and text of the proposed rules follow:

**Contacts** RSAI Professional Advocate, Margaret Buckton, margaret@iowaschoolfinance.com 515.201.3755 RSAI Grassroots Advocate, Dave Daughton, dave.daughton@rsaia.org

**RSAI Leadership Group;**

Dennis McClain, Adair‐Casey/Guthrie Center CSD, Superintendent (Chair, At‐large Director), dennis.mcclain@rsaia.org

Paul Croghan, CAM/Nodaway Valley CSD, Superintendent, (Vice‐Chair, SW Region 3 Director), paul.croghan@rsaia.org

Laurie Noll, Fairfield CSD, Superintendent, (Secretary/Treasurer, SE Region 4 Director), laurie.noll@rsaia.org

Justin Daggett, Manson NW Webster CSD, Superintendent, (NW Region 1 Director), justin.daggett@rsaia.org

Dan Peterson, Central DeWitt CSD, Superintendent, (At‐large Director), dan.peterson@rsaia.org

Nick Trenkamp, Central CSD, Superintendent (NE Region 2 Director), nick.trenkamp@rsaia.org

Scott Williamson, Eddyville‐Blakesburg‐Fremont CSD, Superintendent, (At‐large Director), scott.williamson@rsaia.org

Proposed Rules ARC 5936C <https://www.legis.iowa.gov/docs/aco/arc/5936C.pdf>

****