**RSAI Support: Open Enrollment Proposed Rules**

November 7, 2022

Thank you to members of the Iowa Board of Educational Examiners and staff for your recommendation to have the Board Notice proposed administrative rules in three different areas that all address flexibility in meeting the staffing and educational needs of school districts as we collectively struggle with the teacher and counselor shortages likely to continue for years, if not indefinitely.

The Rural School Advocates of Iowa (RSAI), comprised of over 165 Iowa public school districts, provides the following comments regarding the subject proposed rules indicating our complete support:

Notice of Rules Change to IAC 282 Chapter 14 Special Education. The proposed rulemaking will create an optional K-12 Special Education – All endorsement.

RSAI has included language in our legislative platform for several years asking for the special education generalist (K-12) credential. Particularly in smaller school districts, including those that have one K-12 building or those that have only 1-2 sections at elementary, middle or high school buildings would benefit greatly from the flexibility to have an educator with the generalist K-12 endorsement. Currently, with a shortage in teachers credentialed in special education at all levels, having the option to assign a staff member with that generalist credential creates capacity to move other credentialled staff into the class assigned to their credential maximizes our districts’ abilities to have teachers assigned to classrooms appropriately. We appreciate that this credential does not replace the others, leaving school boards the option to require a license more specific to grade levels if they believe that meets their expectations. We also appreciate the opportunity to support our current staff, already committed to our rural schools, toward this generalist special education credential, which will help us address the needs of our students requiring special education services.

Notice of Rules Change to IAC 282 Chapter 13 Applications from Foreign Institutions. The proposed rulemaking would allow out-of-country applicants to be exempt from PRAXIS testing if they hold a license in another country or if their transcripts show completion of a teacher preparation degree.

Rural school districts (indeed, many school districts regardless of geography in Iowa) have immigrants and refugees who were successful teachers in their prior countries of residence before coming to Iowa. This additional flexibility aligns with recent policy changes for made by the Iowa Legislature and makes good sense in helping to address the teacher shortage. Especially for teachers of foreign language, the challenge of passing the PRAXIS when it’s given in the teacher’s second language proves an unnecessary barrier to licensure of committed and qualified teachers. RSAI supports this proposal.

Notice of Rules Change to IAC 282 Chapter 22 Content Specialist Authorization. The proposed rulemaking would allow candidates with a masters’ degree or higher to obtain a content specialist authorization.

RSAI additionally supports this proposed rule for all of the same reasons listed above to address educator shortages which now apply across the state.

Rural school leaders also fully acknowledge that additional flexibility require an additional commitment from principals, mentor teachers and other staff to support newly credentialled educators as they build their skill set and expertise to meet the needs of students.

At the Oct. 25, 2022 RSAI Annual Meeting, members unanimously approved the following legislative priority (which also translates to support for flexibility that can be accomplished through administrative rules proposals such as these noticed above).

**Education Staff Shortage:** In addition to sufficient SSA, strategies to rebuild Iowa’s education workforce must address two areas during an unprecedented staff shortage:

**Recruitment:** to rebuild the pipeline of interest into education, the Legislature, BOEE and DE must provide additional flexibility for school districts to provide hiring incentives, ongoing investment in CTE programs for high school students to study and experience work in education, provide resources for grow-your-own educators and appropriate certifications, provide means-tested tuition assistance and minimize the economic costs of unpaid student teaching, provide more loan forgiveness, and change the culture of political speech to restore education to a respected profession.

**Retention:** to slow the out-migration of staff from schools to other professions or retirement, the Legislature, BOEE and DE must provide maximum flexibility to hire staff to deliver great instruction; additional flexibility for retention incentives, flexibility to meet offer and teach requirements, opportunities for teaching expanded courses within existing and/or competency based licensure, institute a special education generalist credential, allow districts to hire retirees without a negative IPERS impact, and maintain the commitment to resources for mentoring, training and supporting staff.

Thank you for the opportunity to comment.

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