TO: Illinois State Board of Education

FROM: Robert E. Schiller, Superintendent
      Christopher Koch, Director
      Respicio Vazquez, General Counsel

Agenda Topic: Action Item: Rules for Adoption - Part 29 (Standards for Administrative Certification)

Materials: Recommended Amendments

Staff Contacts: Christopher Koch
              Michael Long

Purpose of Agenda Item

To present the proposed amendments for adoption.

Expected Outcome of Agenda Item

The Board's adoption of the proposed amendments to Part 29.

Background Information

These amendments will put in place a new credential that will eventually be required of all individuals who wish to serve as directors or assistant directors of special education. The set of standards set forth in Section 29.140 will be the basis for a new endorsement, “Director of Special Education”. The remaining provisions in that Section and Section 29.150 describe how individuals may earn this credential and how individuals who are currently qualified to serve as “State-approved director of special education” may receive the new endorsement. A companion amendment to the rules for special education will establish the ending date for the current system of approvals.

These amendments were presented for the Board’s initial review in September of this year and subsequently published in the Illinois Register to elicit public comment. Three letters were received. Please see the Summary and Analysis of Public Comment for a discussion of the issues raised.
**Analysis and Implications for Policy, Budget, Legislative Action, and Communications**

Policy Implications: Please see above. Establishment of this credential is a further step in establishing the standards-based system of credentials for Illinois educators and approval of preparation programs within institutions of higher education.

Budget Implications: This rulemaking has no budgetary implications for the agency.

Legislative Action: None needed.

Communications: Please see “Next Steps” below.

**Superintendent’s Recommendation**

Adopt the following motion:

> The State Board of Education hereby adopts the proposed rulemaking, including the changes recommended in response to public comment, for:

> Standards for Administrative Certification (23 Illinois Administrative Code 29).

> Further, the Board authorizes the State Superintendent of Education to make such technical or nonsubstantive changes as the State Superintendent may deem necessary in response to suggestions or objections of the Joint Committee on Administrative Rules.

**Next Steps**

Notice of the adopted rules will be submitted to the Joint Committee on Administrative Rules to trigger JCAR’s review. When that process is complete, the adopted rules will be filed with the Secretary of State and disseminated as appropriate.

**SUMMARY AND ANALYSIS OF PUBLIC COMMENT**

**Standards for Administrative Certification (23 Ill. Adm. Code 29)**

**Comment**

A revision to the proposed language of Section 29.150(a) was suggested in order to identify more clearly the nature of the letter of approval that would serve as the basis for currently qualified administrators’ receipt of the new endorsement as director of special education.
Analysis
The change suggested by the commenter would improve the rule, because under the current system assistant directors do not receive letters of approval as assistant directors *per se*, as the proposed language implies. However, both directors and assistant directors do receive letters of approval as administrators of special education, and it is those letters to which this rule should refer.

Recommendation
The language of Section 29.150(a) should be revised as shown below:

\[
\text{a) An individual who has received a letter of approval as a director or assistant director an administrator of special education from the State Board of Education at any time may receive an endorsement for director of special education by submitting......}
\]

Similarly, subsection 29.150(b) should be slightly reworded to refer to “An individual who holds an administrative certificate and the teaching or school service personnel certification required by Section 29.140 of this Part but who has never been approved as a director an administrator of special education...”

Comment
One respondent objected to the omission of school counselors from the list of those who could qualify for new endorsement. She noted that the recently adopted standards for certification of school counselors are very similar to those applicable to school psychologists and school social workers and believed that, due to the similarity in their preparation, all three of these groups of school service personnel should be considered equally qualified to serve as directors or assistant directors of special education.

Analysis
Staff has reviewed the respective sets of standards for the endorsements on the school service personnel certificate and reviewed the origins of this rule with the chair of the panel that was involved in its development. We concur that school counselors have comparable preparation in areas relevant to special education and frequently work with students who have special needs. School counselors should have been included in the rule as originally proposed.

Recommendation
The introductory paragraph of Section 29.140 should be revised to refer to “a valid school service personnel certificate endorsed for school psychology, school social work, school counseling, or speech-language pathology.”

Comment
One commenter expressed appreciation for the changeover to an endorsement, stating that it would enhance the credentials of the director of special education.