TO: Illinois State Board of Education

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

Agenda Topic: Action Item: Rules for Adoption – Part 27 (Standards for Certification in Specific Teaching Fields)

Materials: Recommended Amendments

Staff Contact(s): Christopher Koch
Lee Patton
Nancy Patton

Purpose of Agenda Item
To present the proposed amendments to Part 27 for adoption.

Expected Outcome of Agenda Item
The Board’s adoption of the proposed amendments to Part 27.

Background Information
This set of standards has its origins in one of the determinations issued on June 22, 2000, by the Court-appointed Monitor in the Corey H. litigation, Judge Joseph Schneider. The Monitor’s determinations identified necessary changes in Illinois certification policy with respect to both special education and general education teachers. He indicated that, after content standards had been developed for general education teachers in the various subject fields, ISBE would be required to “develop content area standards that relate to the general curriculum for all certificate designations contained in the Final Proposal.” (“Certificate designations” in this context are the various endorsements in the field of special education.)

The Division of Professional Development sought the assistance of representatives of higher education in the identification of these proposed standards and indicators, which
emphasize reading and mathematics as the Monitor indicated but also include fundamental requirements in the natural and social sciences. They represent a synthesis of selected standards that are now in place with respect to elementary and special education as well as reading, mathematics, social science, and natural science. The guiding principle in their development was to state expectations for content knowledge that would enable special educators to afford their students access to the general curriculum as required by IDEA without unduly extending their initial preparation programs.

We note that the ramifications of the federal No Child Left Behind Act have not yet been finally clarified with respect to special education teachers who are directly teaching content rather than serving as consultants to classroom teachers on matters of adaptation and modification. There may be further changes that affect these teachers and the programs that prepare them. However, the agency does have a need to move forward with this proposed rulemaking in light of the timeframe established by the Court in Corey H.

These amendments were presented for the Board’s initial review at the March 2003 meeting and were subsequently published in the Illinois Register to elicit public comment. Two responses were received. Please see the Summary and Analysis of Public Comment below for a discussion of the issues raised.

**Analysis and Implications for Policy, Budget, Legislative Action and Communications**

Policy Implications: Please see above.

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

Legislative Action: None needed.

Communication: Please see "Next Steps" below.

**Superintendent’s Recommendation**

Adopt the following motion:

> The State Board of Education hereby adopts the proposed rulemaking for:

> Standards for Certification in Specific Teaching Fields (23 Illinois Administrative Code 27).

> Further, the Board authorizes the State Superintendent of Education to make such technical or nonsubstantive changes as the State Superintendent may
Next Steps

These adopted rules will be submitted to the Court Monitor and the parties to the Corey H. litigation as a “Final Certification Proposal” under ISBE’s Settlement Agreement. Review by these individuals and discussions among the parties will determine whether the rulemaking can be completed using the regular process. If so, notice of the adopted rules will be submitted to the Joint Committee on Administrative Rules to initiate JCAR’s review. When that process is complete, the adopted rules will be filed with the Secretary of State and disseminated as appropriate. Alternatively, if agreement among the parties cannot be reached and the Court orders a resolution of the issue, the agency will act in accordance with that order.

Summary and Analysis of Public Comment
Standards for Certification in Specific Teaching Fields
(23 Ill. Adm. Code 27)

Comment

Both letters of public comment acknowledged the value of having special education teachers prepared to teach academic content to their students. However, both respondents noted that incorporation of the proposed standards would increase the length of preparation programs for special education teachers and believed this increase in requirements would intensify shortages of qualified teachers for students with disabilities.

It was stated to be unrealistic to expect special education teachers to be “proficient in the areas of K-12 in all of the standards for general education teachers.” The natural and social science standards in particular were stated to be difficult to embed into special education programs without the addition of subject-specific methods courses. One commenter pointed out that special education teachers rarely have sole responsibility for science or social science instruction. In those cases where they do bear this responsibility, instruction is at a basic level only.

One commenter encouraged the State Board to review the standards for the natural and social sciences carefully before adopting them, while the other letter (representing the Illinois State Advisory Council on Education of Students with Disabilities) stated that implementation of these standards would be unrealistic because teachers would be expected to be experts in both general and special education.
Analysis
It is widely acknowledged that Illinois preparation programs for special education teachers will probably extend beyond four years, particularly given the breadth of the standards that now apply to the Learning Behavior Specialist I credential. As stated above, representatives of teacher preparation programs worked in cooperation with agency staff in the development of these proposed standards, and careful attention was paid to setting them at a level that would be applicable to special education teachers.

The participants specifically recognized that instruction in the natural and social sciences is most unlikely to be provided at advanced levels by special education teachers alone. The proposed rule therefore sets forth indicators drawn for the most part from either the common core of standards applicable to teachers in one of those fields or from the applicable elementary-level standards.

The State Board is required to establish standards related to the general curriculum for special education teachers. Everyone involved in the development of these standards shared the concern for adding significant new requirements. However, it is difficult to assert that the natural and social sciences are not integral components of the general curriculum so that the related standards should be deleted from the rulemaking. In the absence of specific suggestions for restating any of these individual indicators, staff believes the rules should be adopted as originally proposed.

Recommendation
No change should be made in the rule in response to these comments.