

**State Board of Education  
Public Comment Summary  
Proposed Permanent Rule Changes  
Chapter 20. Staff**

**Subchapter 9. Professional Standards: Teacher Education and Certification  
210:20-9-98. Administrative requirements of teacher certification [AMENDED]  
210:20-9-104. Certification for languages with no subject area examination [AMENDED]**

Summary of Public Comment	Agency Response
<p>Three (3) commenters expressed support for the rule. One (1) commenter, a tribal language department, stated “This proposed rule is written in an appropriately non-specific language to allow for individual tribal language organizations to determine what levels of language fluency and academic education are required to teach their Native American language within a public school environment.” The commenter went on to commend the Oklahoma State Board of Education “for recognizing the right of Native American students to learn and practice their heritage languages within the public school system, and realizing the cultural importance of providing this opportunity for all Oklahoma Native American students.”</p>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<p>One (1) commenter objects to limiting the recognition of tribal certification only to tribes or tribal entities/organizations which are federally-recognized.</p>	<ul style="list-style-type: none"> <li>• The agency believes the requirement of federal recognition is necessary to the rule, as the State of Oklahoma currently does not have a process for state recognition of a tribe, and it is inappropriate to place the agency in the position of making legal determinations about the legal status of a tribal government which is unrecognized as a tribe by the United States Department of the Interior.</li> </ul>
<p>One (1) commenter recommended that the language in 210:20-9-104(d)(2) be changed from “core academic subject” to “core academic subject as a world language.”</p>	<ul style="list-style-type: none"> <li>• The agency has incorporated the change suggested by the commenter into the revised draft of the proposed rule.</li> </ul>

<p>One (1) commenter requested additional language be added providing that individuals who already hold Oklahoma teaching certificates be automatically deemed “highly qualified” status by virtue of having an Oklahoma teaching certificate.</p>	<ul style="list-style-type: none"> <li>• HQ status is not automatic, but rather a fact-based determination that must be made on an individual basis in accordance with federal requirements.</li> <li>• The agency has revised (c)(2) to require a tribe designate its language proficiency assessments in order to provide the agency with information necessary to determine HQ status if applicable.</li> </ul>
<p>One (1) commenter requested that the language 210:20-9-104(d)(1) permitting an individual who holds a certification in a Native American Language to accept a teaching position or assignments...“at the proficiency level(s) for which they hold certification” be amended to clarify that an individual holding a certificate should be permitted to teach at all grade levels.</p>	<ul style="list-style-type: none"> <li>• The agency has amended the rule to clarify the intent of the rule that the tribe designate the grade levels for which it intends to certify an individual to teach in addition to proficiency levels.</li> </ul>
<p>One (1) commenter requested the language in 210:20-9-98(d)(1)(C) requiring an applicant submit a portfolio “documenting applicant’s expertise in Native American languages” should be amended to require a portfolio “documenting applicant’s experience in teaching a Native American language in the language in which you are tribal certified and any other experience related to tribal education or public education.”</p>	<ul style="list-style-type: none"> <li>• The agency has incorporated the change suggested by the commenter into the revised draft of the proposed rule.</li> </ul>
<p>Commenters suggested clarifying what constitutes a “professional teaching development program.”</p>	<ul style="list-style-type: none"> <li>• The agency has incorporated the change suggested by the commenter into the revised draft of the proposed rule. The language has been changed to clarify that professional development may include <u>programs, seminars, or conferences recognized for professional development credit by an Oklahoma public school district at the time the teacher attends or higher education coursework in teacher education from an accredited college or university.</u></li> </ul>
<p>Commenters expressed concerns that the language in 210:20-9-98(d)(2)(ii) requiring sixty (60) clock hours of a professional teaching development program as a condition of renewal of a provisional</p>	<ul style="list-style-type: none"> <li>• The agency has revised the language to clarify the requirement that completion of sixty (60) clock hours each year for the first two years is necessary for applicants who do not hold an Oklahoma traditional or alternative teaching</li> </ul>

<p>certificate for the first two years under the rule is not clear as to whether the applicant must complete sixty (60) clock hours each year or a total of sixty (60) clock hours for two (2) years.</p>	<p>credential.</p>
<p>One (1) commenter suggested that the language in 210:20-9-104(b)(2) leave the designation of specific academic credential requirements for Native American language up to the discretion of tribes or tribal entities, noting that for many Native American languages no formal degree exists.</p>	<ul style="list-style-type: none"> <li>• The agency agrees with the comment that the appropriate degree requirements for determining proficiency to teach Native American languages should be determined by the tribe who is certifying the language.</li> </ul>
<p>Commenters requested that the language in 210:20-9-104 (b)(2), referencing the degree requirements for applicants for Native American language certificates, be revised to make it consistent with (n).</p>	<ul style="list-style-type: none"> <li>• The agency does not agree with the change requested by the commenters.</li> <li>• The purpose of 210:20-9-104 (b)(2) is to recognize subject area certification of teachers of Native American languages. The commenters' proposed change would limit the ability of districts to hire Native American language teachers without traditional Oklahoma teaching certificates as visiting or adjunct teachers of Native American languages.</li> </ul>
<p>Commenters requested that the language in 210:20-9-98 (c)(1)(C), referencing the degree requirements for an applicant for a noncitizen visiting teacher certification be revised to make it consistent with (n). Commenters proposed that the use of the word "accredited colleges" seems unreasonably limiting here.</p>	<ul style="list-style-type: none"> <li>• The agency agrees that the word "accredited colleges" seems unnecessarily limiting and has revised the language to "accredited college or university."</li> <li>• The purpose of the language in 210:20-9-98 (c)(1)(C) is to provide a pathway for nontraditional certification for noncitizen visiting teachers from other countries. The commenters' proposed change would limit the ability of districts to hire visiting teachers who obtained their degrees outside of the United States.</li> </ul>
<p>Commenters proposed to insert the word "subject" before the word "area" and delete the word "for which" in 210:20-9-98(c)(1)(C) so that the phrase reads "...in the subject area the applicant intends to teach."</p>	<ul style="list-style-type: none"> <li>• The agency has incorporated the change suggested by the commenters into the revised draft of the proposed rule.</li> </ul>
<p>One (1) commenter stated that "as a language education specialist, I find section 210:20-9-98 (c) (1) (f), which requires language teachers to obtain a certain English score, to be unnecessary."</p>	<ul style="list-style-type: none"> <li>• The agency does not agree with the request to drop the requirement of a certain English score on the ACTFL.</li> <li>• 210:20-9-98(c)(1)(F) is applicable only to</li> </ul>

	<p>noncitizen visiting teacher certification, and is necessary to ensure noncitizen visiting teachers have sufficient proficiency in the English language to communicate effectively.</p>
<p>Commenters proposed to insert the word “and” after the semicolon at the end of 210:20-9-98(d)(1)(B) to clarify that all three of the criterion must be met.</p>	<ul style="list-style-type: none"> <li>• The agency has incorporated the change suggested by the commenters into the revised draft of the proposed rule.</li> </ul>
<p>One (1) commenter urged that the certification procedure be as free or as low-cost as possible because of the lack of resources available for Native American language education.</p>	<ul style="list-style-type: none"> <li>• The rule does not address cost related to certification; therefore the comment is outside of the scope of the proposed rule change.</li> </ul>