

I oppose the concept of the Adjunct Teacher Permit which is on your agenda today.

Further, I submit that the amended language proposed by the Department to be voted on today does not even meet the guidelines prescribed by this Board at your December 5th meeting.

This written proposal falls short in two specific ways:

1. **This language does not align with the Board's guidance in the discussion of this issue on December 5th.** It gives Adjunct Permit teachers five years to complete the "pedagogy component under subsection (d)". During the December 5th discussion, Mr. Pickett who made the motion specifically said that he wanted the Adjunct Teachers to have pedagogy training right away as they begin their teaching, and Dr. Bennett offered the model of workplace specialists who begin training in the first year of their experience. Under this proposed language, Adjunct Teachers are not obligated to begin pedagogy training for perhaps three or four years. By then, it may be too late for their success in the classroom.
2. **This language allows private organizations, colleges or professional organizations to offer the six-part pedagogy training programs without specifying any standards or certification procedures to allow the Department to monitor the quality of these programs.** This is a major deletion which must be remedied with additional language. The delivery of these programs by for-profit entities rather than by colleges is a new and extremely controversial concept which by itself should trigger additional hearings.

These revisions are clearly major, substantive changes. Indiana Code 4-22-2-29 says:

Sec. 29. (b) An agency may not adopt a rule that substantially differs from the version or versions of the proposed rule or rules published in the Indiana Register under section 24 of this chapter, unless it is a logical outgrowth of any proposed rule as supported by any written comments submitted:

- (1) during the public comment period; or
- (2) by the Indiana economic development corporation under IC 4-22-2.1-6(a), if applicable.

Clearly, this language "substantially differs from the version" printed in the official record. It describes a new "pedagogically light" training program which may be offered by for-profit entities as well as colleges, language that was **not** "supported by any written comments submitted during the public comment period" as the law requires.

This rule is not ready for final approval. I urge you to table this language today and to bring these major changes revealed for the first time only a few days ago to the public for additional public hearings.