

Minnesota Attorney General: Administrative Rules Proceedings

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Version 3
August 20, 2018

Our File #540

RULES REVIEW CHECKLIST

DATE RULES RECEIVED 9-6-79 Temporary Rule _____

Resubmitted and Received _____

DUE DATE 9-26-79

a. Returned to Agency w/o filing w/Secy of State _____
b. Approved 9-24-79 Date Sent Back to Agency 9-24-79

- -

1. Rules as Adopted ✓
2. Rules as Proposed ✓
3. Certificate of Board's Authorizing Resolution, where applicable ✓
4. Order for Hearing ✓
5. Notice of Hearing ✓
   (i) Sufficiency ✓
6. Secretary of State's List ✓
7. Certificate of Acquisition of Secretary of State's List ✓
8. Affidavit of Mailing ✓
   (i) At least 30 days prior to hearing ✓
9. Statement of Need and Evidence ✓
10. Hearing Examiner's Report ✓
11. Agency's Findings of Fact Bd resolution adopts HE Report
12. Certificate of Board's Resolution Adopting Rules, where applicable ✓ ✓ Bd of Ed. Appvd
13. Order Adopting ✓
14. Report of Chief Hearing Examiner ✓
    (i) Finding of No Substantial Change ✓
    (ii) Permission to Incorporate by Reference, where applicable N.A.
15. Certificate of Compliance with Rulemaking Procedures ✓
16. Copy of Notice of Intent to Solicit Outside Opinion, where applicable N.A.
17. Petition by Public, where applicable N.A.

MINNESOTA BOARD OF TEACHING
608 CAPITOL SQUARE BUILDING
550 CEDAR STREET
ST. PAUL, MINNESOTA 55101
(612) 296-2415

KENNETH L. PEATROSS
EXECUTIVE SECRETARY

EXECUTIVE COMMITTEE
JOSEPH MOREN, CHAIRMAN
JO MALMSTEN, VICE-CHAIRMAN
MARGERY HARRIS, SECRETARY
EDWARD HUDOBA, DIRECTOR
MARIE McNEFF, DIRECTOR
KATHRYN RAYBURN, DIRECTOR

September 5, 1979

Mr. Lee Sheehy, Special Assistant
Attorney General
Room G-19 K
Administration Building
St. Paul, Minnesota 55155

Dear Mr. Sheehy:

Pursuant to the rules of the Office of the Attorney General, I hereby submit for final approval by the Office of the Attorney General 5 MCAR § 3.142 the rule governing the licensure of Teachers Prepared in States Other than Minnesota, heard at public hearing on January 20, 1979, which has been adopted by the Minnesota Board of Teaching and approved by the Minnesota Board of Education.

The rule submitted for final approval is attached to the Affidavit of Howard B. Casmey.

The complete hearing record is also enclosed pursuant to the requirements of the Office of the Attorney General.

Sincerely,

Kenneth L. Peatross

Kenneth L. Peatross, Executive Secretary
MINNESOTA BOARD OF TEACHING

KLP/nad

Enclosures

cc: Donald J. Mueting
Special Assistant Attorney General

Duane Harves
Chief Hearing Examiner

ADMIN 1: Our File No. 540

DEPARTMENT: Attorney General

STATE OF MINNESOTA

Office Memorandum

TO : Kenneth L. Peatross
Executive Secretary
Minnesota Board of Teaching

DATE: 9/24/79

FROM : Lee E. Sheehy
Special Assistant
Attorney General

PHONE: 296-1238

SUBJECT: Rules as Approved In the Matter of the Proposed Adoption of Rules of the Board of Teaching Governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other Than Minnesota.

Enclosed herewith are the rules you have submitted for approval. These rules have been approved by this office and filed with the Secretary of State. Note that they have NOT been filed with the State Register; this must be done promptly by your agency.

Upon receipt and before transmittal to your agency, however, it is important that you recheck these rules as to:

1. Affixation of the stamps of the Attorney General and Secretary of State to the last page of the rules;

2. Coverage by these stamps of all rules submitted; and

3. Inclusion of all pages of the rules in the approved set.

Directly following the approved rules is a complete set of required documents and transcript which must be retained with the rules by you or your agency.

If you have any questions in this regard, please contact me.

LES/dw
Enclosure

cc: Donald Mueting
Duane Harves

AFFIDAVIT OF
HOWARD B. CASMEY

Howard B. Casmey, being first duly sworn on oath, deposes and says that:

1. He is the Minnesota Commissioner of Education and the Executive Officer and Secretary of the Minnesota Board of Education and he held this position on August 6, 1979.

2. On August 6, 1979, the Minnesota Board of Education approved the proposal of the Minnesota Board of Teaching to adopt the rule entitled:

5 MCAR § 3.142

(Copy attached I).

FURTHER AFFIANT SAYETH NOT.

HOWARD B. CASMEY

Subscribed and sworn to before
me this 20 day of August, 1979.

Luana Vadnais
Notary Public

LUANA VADNAIS
NOTARY PUBLIC-MINNESOTA
RAMSEY COUNTY
My Comm. Expires June 16, 1984

Copy I

MINNESOTA BOARD OF TEACHING
ADOPTED RULE

5 MCAR § 3.142 Teachers prepared in states other than Minnesota.

A. Licenses to teach in Minnesota shall be granted to persons who otherwise meet applicable statutory requirements and who complete programs leading to teacher licensure in teacher preparation institutions located outside Minnesota. Such licenses shall be granted only in licensure fields for which the board of teaching has established rules governing programs leading to teacher licensure. Such licenses shall be issued according to either 1. or 2. as follows:

1. Persons who complete approved programs leading to teacher licensure in teacher preparation institutions within states which have signed contracts with Minnesota according to the provisions of the interstate agreement on qualification of educational personnel shall be granted a Minnesota entrance license. No licenses shall be issued on the basis of teaching experience only.

2. Persons who complete programs leading to teacher licensure in teacher preparation institutions within states which have not signed contracts with Minnesota according to the provisions of the interstate agreement on qualification of educational personnel shall be granted a Minnesota entrance license when all of the following criteria are met:

a. The teacher preparation institution is regionally accredited by the association for the accreditation of colleges and secondary schools.

b. The program leading to teacher licensure has been recognized by the state as qualifying the applicant completing the program for such licensure within that state.

c. The program leading to teacher licensure completed by the applicant is essentially equivalent in content to approved programs offered by Minnesota teacher preparation institutions according to board of teaching rules governing the licensure field.

d. The teacher preparation institution which offers the program leading to licensure verifies that the applicant has completed an approved teacher licensure program at that institution and recommends the applicant for a license in a licensure field at a licensure level.

e. The applicant has completed a major or minor program leading to teacher licensure as verified by the transcript issued by the institution recommending the applicant for licensure.

f. The applicant has completed student teaching in the licensure field and at the licensure level of the program.

B. Notwithstanding the rule governing human relations, persons who have been prepared as teachers in states other than Minnesota shall be granted a Minnesota entrance license based upon the provisions of this rule.

APPROVED AS TO FORM AND LEGALITY
SEP. 24 1979
WARREN SPANNAUS, ATTORNEY GENERAL
BY _____ 19 ____
SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
SEP 24 1979
Joan Anderson Growe
Secretary of State

12:40 PM

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE MINNESOTA BOARD OF TEACHING

In the Matter of the Proposed Adoption of Rules of the Board of Teaching Governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota.

REPORT OF HEARING EXAMINER

The above-entitled matter came on for hearing before Hearing Examiner Howard L. Kaibel, Jr. of the Minnesota Office of Hearing Examiners at 9:00 a.m. on Saturday, January 20, 1979, in Conference Room D of the Veterans Service Building, Saint Paul, Minnesota.

Donald J. Mueting, Special Assistant Attorney General, 301 Capitol Square Building, appeared as counsel for the Minnesota Board of Teaching (hereinafter the "Board of Teaching"). Eleven members of the Board of Teaching were present at the hearing. Over 15 persons gave testimony on the rules. The hearing continued until all interested groups or persons had an opportunity to be heard concerning the adoption of the proposed rules. Approximately 15 letters from teachers in Minnesota were brought to the attention of the Board at the hearing.

Pursuant to Minn. Stat. Sec. 15.0412, subd. 4 (1978), this Report shall be available for review to all affected individuals upon request for at least five working days.

The Board of Teaching shall, if it proposes to adopt the rules as originally proposed or amended, submit the complete hearing record to the Chief Hearing Examiner no earlier than five working days subsequent to the receipt of this Report. The Board of Teaching shall include the rules as originally proposed and the rules as proposed for adoption in final form. The Chief Hearing Examiner shall complete this review and submit his report to the Board of Teaching on the issues of substantial changes in the rules and compliance with Minn. Stat. Sec. 15.0412 within ten calendar days. Thereafter, the Board of Teaching shall be responsible for filing the rules with the Attorney General.

Based upon all the records and proceedings herein, the Examiner makes the following:

FINDINGS OF FACT

1. That on November 21, 1978, the Board of Teaching filed the following documents with the Office of Hearing Examiners:

(a) A proposed Order for Hearing;
(b) A proposed Notice of Hearing;
(c) A Statement of the estimated length and number of people attending the hearing;
(d) The Certificate of Board's authorizing resolution; and
(e) A copy of the proposed rules.

2. That on December 18, 1978, a Notice of Hearing and a copy of the proposed rules were published at 3 State Register 1310.

3. That on December 21, 1978, the Board of Teaching mailed the Notice of Hearing to all persons and associations who had registered their names with the Secretary of State for the purpose of receiving such notice.

4. That on December 26, 1978, the Board of Teaching filed with the Office of Hearing Examiners the following documents:

(a) The Order for Hearing;
(b) The Notice of Hearing and proposed rules as mailed;
(c) The Affidavit of Receipt of the Secretary of State's mailing list;
(d) The Affidavit of Mailing;
(e) The Secretary of State's Certificate and list;
(f) The Statement of Need; and
(g) The Statement of Evidence.

The documents were available for inspection at the Office of Hearing Examiners from the date of filing to the date of hearing.

5. That the record remained open through January 26, 1979, for the receipt of written comments and statements.

6. That statutory authority to promulgate the proposed rules is found in Minn. Stat. Sec. 125.05, subd. 1(1978), Minn. Stat. Sec. 125.185, subd. 4 (1978) and Minn. Stat. Sec. 125.06 (1978).

7. That proposed "clarifying" amendments to the proposed rule 5 MCAR Sec. 3.002 were read into the record at the hearing and marked as Exhibit 10. The first of these changes would restrict the five years of qualifying experience to teaching "in the State of Minnesota". The second change would limit the classifications of life licenses to "licenses held in the school year immediately preceding July 1, 1969", instead of the original language which would have allowed them for "grades and subjects taught and licenses held". It is difficult to assess whether these proposed revisions are "substantial changes" requiring an additional hearing on this record because there is no evidence as to how many teachers will be disqualified as a result of applying these additional limitations. That decision will have to be made by the Chief Hearing Examiner, if the Board of Teachers proposes to incorporate them on final adoption.

Toward the end of the hearing, the Board also indicated an intention to change the rule to include private school teachers. The only persons conceivably adversely affected by this revision are the public school teachers who will not qualify for life licensure, because of the 1968-69 and other limitations, by intensifying their feelings of "discrimination". These feelings have been extensively expressed in the record and a further hearing would consequently not appear to be necessary to incorporate this proposed revision.

The Board also indicated an intention to revise the proposed rule to exclude teachers who held only "elementary school limited certificates" in 1968-69 as discussed later in this Report. Again, there is no estimate in the record of how many teachers would be adversely affected by this proposed restriction which was not contained in the proposed rules as originally noticed for hearing.

8. That in 1969, the Minnesota Legislature abolished a category of licenses called "Permanent Certificates" which were granted to certain

teachers who had at least five years of experience teaching in Minnesota Public Schools, effective July 1, 1969. Thus, many active teachers who had less than five years experience prior to 1969, and expected to be able to achieve permanent licensure were deprived of that opportunity. In 1973, the Legislature again granted authority to issue "life licenses" by amending Minn. Stat. Sec. 125.185, subd. 4, to state that the Board of Teaching shall "grant life licenses to those who qualify according to requirements established by the Board of Teaching". In 1974, the Legislature also enacted Minn. Stat. Sec. 125.071 which allowed public school and private school teachers with five years of experience prior to July 1, 1969, to obtain a permanent certificate "upon payment of a $10 fee provided that the application is submitted to the department of education prior to July 1, 1975".

Mr. Edward A. Rapp (hereinafter "Mr. Rapp"), member of the Board of Teaching, testified that "that was the Legislature's attempt to correct the inequities of those who did not get life licensure and, yet, were teaching in 1969". (T. 18) He stated that other inequities existed and, hence in 1976, a bill with almost the identical language of the proposed rule was introduced in the Legislature. He further stated that rather than have the Legislature enact into law rules that fall within the purview of the Board of Teaching, the Board proposed to correct those inequities by rule. (T. 18)

The Board of Teaching proceeded, in October of 1976, to attempt to enact a rule granting life licensure to certain teachers who were teaching "in the school year immediately preceding July 1, 1969". The Hearing Examiner in that rule proceeding concluded that such a rule was not reasonable because it restricted its application to only those teachers. Mr. Rapp proposed in that proceeding to change that proposed rule to allow life licensure for teachers teaching "in <u>any one of the three years</u> immediately preceding July 1, 1969" (emphasis added) to allow for temporary absences prior to 1969, while excluding those teachers who left the profession for an extended period of time. The Hearing Examiner in that proceeding recommended that Mr. Rapp's proposed change be incorporated. (Hearing Examiner's Report, Docket No. BT-77-001-PE) That proposed rule was never finally adopted.

This proposed rule would also only grant life licenses to those who were teaching full-time in the state in the school year immediately preceding July 1, 1969, and have five years of Minnesota teaching experience. The effect of these limitations is to allow some undetermined number of those teachers who, in fact, had some expectation of permanent licensure prior to 1969, the opportunity to achieve "life licensure" now. The primary impact of this "life licensure" is that these teachers would be totally exempted from the continuing education system of professional growth established for all teachers without "permanent certificates" in 1971. The proposed rule includes a July 1, 1980 expiration date for applications.

A. The following persons had an expectation of receiving a permanent certificate when that law was eliminated July 1, 1969 (if that law had not been changed and they had been allowed to acquire necessary qualifying

experience), but will not be allowed to apply for a "life license" under the terms of the proposed rule:

(1) Teachers with full-time certified experience during the 1967-68 school year, no matter how many years they have put in before or after that time, if they were not teaching full-time during the 1968-69 school year. These teachers had identical expectations as 1968-69 teachers because the permanent certificate law allowed for applications if a teacher had taught "at any time during the two year period immediately preceding the date of application";

(2) Men or women serving in the armed forces during the 1968-69 school year (the time of the Vietnam War) including men who were involuntarily doing so under the then-existing military draft, regardless of how many years of experience they have in Minnesota schools;

(3) Women on maternity leave during the 1968-69 school year voluntarily or involuntarily, regardless of how many years of Minnesota or other teaching experience they have;

(4) Teachers on educational leave during the 1968-69 school year, voluntarily or at the "request" of their district to improve their abilities as teachers (or otherwise) regardless of total teaching experience;

(5) Teachers who were on leave in 1968-69 because of other situations beyond their control such as illness or disability or to care for a terminally ill child and those on leave by choice for such things as travel, regardless of other years of teaching experience;

(6) Teachers who taught in a private school without an active certificate in 1968-69, regardless of the number of years of other experience that teacher has;

(7) "Commissioned or enlisted personnel of the Minnesota national guard" regardless of whether they were teaching full-time during 1968-69 and regardless of other total teaching experience;

(8) Any teacher who had "supervisory" responsibilities of any kind in 1968-69 as that term is defined in the public employment law and in court cases, regardless of supervisory or nonsupervisory teaching experience in other years;

(9) Principals and assistant principals certified as such in 1968-69 regardless of the extent of their teaching experience, though they were eligible for permanent licensure as principals under the law repealed in 1969;

(10) Students pursuing their entry level requirement for licensure during the 1968-69 school year including those who had delayed their education in order to fulfill military service obligations, who have as many as 10 years of subsequent teaching experience;

(11) Teachers who taught in a school outside the state in 1968-69 regardless of prior or subsequent experience teaching within the state;

(12) Teachers who taught in Minnesota in 1968-69, but who taught outside of the state for part of their five year qualifying period;

(13) Fully certified and in many cases experienced teachers who were employed during the 1968-69 school year as "aids" or tutors or in some

other capacity for which a license is not required by the Board of Teaching; regardless of how many other years of teaching experience they may have;

(14) Teachers who worked less than 100 days (depending on whether the Board decides on a case-by-case basis that the position was or was not "temporary" or "seasonal") or less than 14 hours per week or 35% of the normal workweek in 1968-69, including substitute teachers that year, regardless of other experience;

(15) Teachers who served temporarily as principals or assistant principals during the 1968-69 school year, ignoring completely their other teaching experience; and

(16) Any teachers who have allowed their certificates to expire as of the effective date of the final adoption of this proposed rule.

B. The following teachers had no expectation of receiving a "permanent certificate" when that law was eliminated, but will be allowed to apply for a "life license" under the proposed rule:

(1) Private school teachers who had an active state license during the 1968-69 school year (no language was proposed to accomplish this, but it appears that the Board intends to credit private school teaching experience for both the 1968-69 and the five year requirements);

(2) Recreational teachers who were explicitly left out of the former permanent certificate law by the Legislature;

(3) Provisional licensees during the 1968-69 school year; and,

(4) Teachers who were only temporarily teaching in a particular "area" (subject matter or school level) in 1968-69 and who do not have four further years of experience in that area, so long as they have a total of five years of some kind of Minnesota teaching experience.

9. That support for the proposed rule was expressed by Mr. Gregory Waddick (hereinafter "Mr. Waddick"), Assistant Commissioner, Minnesota Department of Education, Division of Special Services, on behalf of the Office of Commissioner of Education (T. 30), the Minnesota Education Association (hereinafter "MEA") (T. 33), the Minnesota Federation of Teachers (T. 40), and the Catholic Schools of the Archdiocese of St. Paul and Minneapolis (T. 45).

The MEA testified concerning two surveys conducted in the State of Minnesota in which teachers supported life licensure and the rationale advanced by those teachers that prior to 1969, when teachers in Minnesota received initial certification, the first step of a certification system which included a permanent certificate after five years of teaching, an agreement was, in effect, signed with the State of Minnesota. Those teachers expected that they would be allowed to complete that five-year period and receive their permanent certificate. The MEA then stated that adoption of the proposed rule would enable the State of Minnesota to honor its promise to these teachers in Minnesota. (T. 33, 34)

A show of hands indicated that about 37 individuals present at the hearing concurred with these expressions of support for the proposed rule.

The similar situation of a teacher who has a valid Minnesota license, is signed during the period prior to July 1, 1969, to a contract by a school in Minnesota but does not begin teaching until the fall of 1969, was referred

to by another teacher (T. 48) That person would not be eligible for a life license under this rule. The question raised was whether these teachers have any less of an agreement with the State in terms of their investing in that education with the expectation of receiving a permanent certificate. (T. 64)

The Statement of Need and previous testimony of Mr. Rapp also argued that an agreement was signed with the State of Minnesota when teachers in Minnesota, prior to July 1, 1969, applied for and received initial licenses which were the first step of a licensure system that included a permanent certificate after five years of teaching. (T. 17, 65) Discussion then focused on the meaning of "agreement with the State". Mr. Rapp stated that it was the holding of the license that was considered contractual. (T. 65) Mr. Donald J. Mueting (hereinafter "Mr. Mueting"), attorney for the Board of Teaching, then stated that there is no agreement between the teachers and the State or the Board of Teaching; the contractual relationship is with the school district. A license is not a contract. (T. 66) Mr. Rapp then withdrew that part of his testimony and the statement of need about an agreement. (T. 68)

Mr. Rapp and the statement of need further stated that what the Board of Teaching had attempted was to look at what the inequity was in 1969, and to see who should have been granted a permanent certificate under the law repealed in 1969, and then to grant those persons a life license now. (T. 67) This was the sole remaining argument for the need for the proposed rule and this Report accordingly concentrates on the "equities" involved.

Several members of the public severely criticized the "equity" achieved by the proposed rule. One teacher wrote, for example:

> After listening to testimony at the hearing, I believe, though the ruling as it stands would grant me personally a life license, that there will still be inequity for other people unless this ruling is amended to allow for them or additional rulings later are accepted to do that.
>
> All teachers who were employed in Minnesota with the proper qualifications during any school year between that of 1965-1966 and 1968-1969 received initial licenses which they believed were the first steps of earning a life license. If they taught during any of those preceding years but for reasons such as illness, pregnancy . . . at that time many districts were still allowed to require resignation in cases of pregnancy, drafting into military service, or some other circumstance did not happen to teach the 1968-1969 school year they would not be covered by this ruling. I do not understand how the state had any less of a commitment to them, and if it is the purpose of the State Board of Teaching in proposing this ruling to provide an opportunity for all those who received initial licenses prior to July 1, 1969, to be able to fulfill the "agreement" the state of Minnesota made with them I feel they would be unfairly excluding many qualified. I personally know one person who taught from 1965 into December of 1968 and was then required to resign because of pregnancy. She actually completed more years of earning that life license than some of the rest of us who started later but happened to be able to teach during the 1968-1969 school year.

> Also, since the number of people who would be able to qualify for the life license under this ruling is finite, I see no need to have an expiration date. Most of us affected who are currently teaching in Minnesota would need to apply within a five year period since our current licenses would expire sometime during that period. The only effect an expiration date would have is that it could be used to deprive someone who may for reason of not having been informed not apply though he is qualified to receive it. The slight inconvenience it may cause the state to keep that opportunity open for him does not, in my opinion, counteract the injustice that would be done to that person. It may be argued that there was an expiration date during the former "grandfather clause" and that that justifies one on this. Assuming that there were any persons who had earned life licenses who did not apply that impresses me as the kind of unnecessary injustice and insensitivity to individuals that contributes to the development of cynical attitudes toward government and those who administer it. (Emphasis added.)

Another teacher focused on the inherent inequity of selectively exempting teachers from continuing education, "It seems to me that we all (even present Life holders) must acquire those blasted renewal units or no one!" (Emphasis original.)

10. That an amendment to proposed Rule 5 MCAR Sec. 3.002 was proposed at the hearing and also by letters from several teachers to change "employed as a teacher in the State of Minnesota" so that persons teaching in a school outside Minnesota in 1968-69 would also qualify. (T. 20, 58, 89) The proposal at the hearing was prompted by the situation of a teacher who had received a Minnesota teacher's certificate in 1962, but was unable to find a satisfactory teaching job in Minnesota in 1965, after fulfilling an R.O.T.C. obligation and, therefore, took a job in Wisconsin. Subsequently, he returned to Minnesota in 1970, and has taught here since them. (T. 21) The witness argued that teaching outside the State of Minnesota is not less valid experience than teaching in Minnesota. (T. 21, 58) Several letters urged similar revisions including the Sauk Centre Education Association IDP Committee which also concluded in general that "July 1, 1969 is an arbitrary date".

> We believe people currently teaching in Minnesota who have five years experience and having taught in other states, yet fulfill requirements are being discriminated against.

(The Committee also recommended changing the qualifying teaching period to five years prior to or subsequent to July 1, 1969.) Another teacher wrote who has taught continually in Minnesota since 1965 except for 1968 to 1970, when he counseled in Wisconsin complaining that he would be excluded "because I spent the 'wrong' two years in Wisconsin". The expectation of life licensure for these individuals would not be realized under the rule as proposed.

Mr. Waddick stated that it was his understanding as conveyed to him by Dr. George Droubie (hereinafter "Dr. Droubie"), Director of the Personnel Licensing Section, Department of Education, that "at no point in time prior to legislative termination of eligibility for life licensure for teachers was experience beyond or outside Minnesota considered to be applicable for eligibility for that life licensure". (T. 31) He further stated that to adopt

such a consideration would insert a "double standard which was contrary to the practice during the interim when life licensure was routinely available". (T. 32) Mr. Waddick did not try to distinguish this proposed divergence from the 1969 law from the other aspects in the Board's proposed rule which would change the practices in 1969, such as including recreational and private school teachers. Mr. Waddick's response also misses the point of the proposed amendment. This witness was not trying to get the Wisconsin experience to count toward his necessary five years. He has nine years of Minnesota experience. He objects to restricting the "arbitrary" 1968-69 year-of-actual-teaching limitation to certified teachers with Minnesota jobs.

The witness responded to Mr. Waddick's statement that experience out of the State of Minnesota was never intended to apply toward Minnesota licensure by stating that, "That's kind of saying that we've always done it that way, so that's the only way it should be. And, you know, we try to justify discriminating against blacks in this country for years by saying -- well, we always kept them in separate fountains and separate eating establishments, and that's the way we should do it. That didn't make it right." (T. 52) While neither the Board of Teaching nor the Department of Education disagreed with these remarks, Mr. Waddick stated later in the hearing that the Board of Education was "not attempting to pursue a course of discrimination on bases of invidious distinction, but we are trying to put in place a manageable system by which to remedy those overt errors, perhaps, or inadequacies, recognizing that perhaps not everyone, over the course of a long period of time, is correctable by this particular rule". (T. 96)

11. That this and other teachers proposed that a provision be made for personal or individual appeal to the Board of Teaching on the ground of a special case. (T. 24, 64, 39) The rule as proposed does not include such a provision.

12. That amendments to 5 MCAR Sec. 3.002 were proposed in a letter from a teacher that the rule should read "the teaching experience in the year prior to July 1, 1969 or a prior year" or that the minimum qualification be a Bachelor's Degree, plus teaching somewhere in 1968-69, plus five years of experience. (T. 72, 75) Another teacher suggested by letter adding the 1966-67 and the 1967-68 school years. (T. 79)

Mr. Kenneth L. Peatross (hereinafter "Mr. Peatross"), Executive Secretary for the Board of Teaching, responded that "the Board is not proposing to establish new or different standards for the issuance of life licenses as defined in Minnesota Statutes", but "are proposing to correct an inequity, utilizing the statutory criteria which has been applied". (T. 77) Mr. Waddick then referred to how rules emerge from the hearing process, are adopted by the Board of Teaching and are transmitted under current statute to the State Board of Education for final adoption. He explained that the proposed rules are the result of "the process of the subtleties of negotiation between this Board and the State Board of Education". The sole reason advanced for the limitations in the proposed rule was these "negotiations" to avoid the threatened veto, because of the:

> Clear determination and aspiration on the part of the State Board of Education for life licensure as a generalized system to come to a conclusion, to be followed by an overall implementation and institutionalization of continuing education. (T. 92, 93)

Mr. Waddick stated that the 1968-69 limitation in the proposed rule resulted directly from negotiations between the Board of Teaching and the State Board of Education. (T. 94) He explicitly threatened a veto if these negotiations were upset by any attempt to amend the proposed rule to remedy inadequacies, deficiencies or areas of discriminatory impact:

> What may be occurring then, in the process of attempting to deal with individual cases and expanding potentially the number of people who will be served by the rule, is a subsequent determination on the part of the State Board of Education that the flood gates, in fact, have been thrown open broadly and a determination by that Board of a negative inclination to approve and adopt this rule. (T. 93, 94)

One member of the Board of Teaching frankly admitted that the veto threat was keeping him from proposing cures for what he acknowledged to be "inequities", calling himself "a little bit of a political animal". (T. 97, 98) There was no post-hearing submission by the Board of Teaching or its Staff attempting to deal with any of the problems and proposed changes discussed at the hearing.

13. That several letters received from teachers complained that under the proposed rule teachers completing their B.A. degree in the 1968-69 school year who were not teaching would not get a life license while others teaching in that year without a B.A. degree could get life licenses. (T. 101) Dr. Droubie explained that in the past there were teachers who graduated from what were called the State teacher colleges. At that time, the standard for licensure was two years of teacher training. Over the years, the criteria for licensure have changed. Therefore, in the 1968-69 school year, there were teachers teaching without a B.A. degree at the elementary level. Even though someone entering teaching in 1968-69 needed a B.A. degree, people renewing a license who were issued that license based on less than a degree could keep renewing it provided they met the renewal conditions. (T. 99, 100)

14. That an amendment to the proposed rule was proposed by a teacher so that teachers who teach with the Department of Defense overseas be included in the provisions of the rule. The witness pointed out that there is no certification available for these individuals elsewhere so that they must be certified in Minnesota. Mr. Mueting responded that unless the rule is changed these teachers will not qualify for life licensure. Mr. Rapp stated that the Board of Teaching would consider the proposed amendment. (T. 35, 38)

15. That a teacher who had taught four years in the State of Minnesota, resigned to get his Master's in the school year 1968-69 and then returned to teach at the same school the following year and had been there since, stated that since he was not teaching the year immediately preceding July 1, 1969, he would not be eligible for life licensure under proposed 5 MCAR Sec. 3.002. The witness stated that he felt that this was an inequity because if someone had resigned in 1967, and gone back to school and then came back to

teach, he would be eligible. (T. 38) Mr. Rapp acknowledged that this inequity was intentional, stating that the rule, as drafted, was intended to correct the inequity only for the class of teachers who were actually teaching in Minnesota in the year immediately preceding the year in which the Legislature canceled permanent licenses. (T. 39) This limitation was proposed despite the fact that the permanent certificate law which was canceled, applied to any teacher who had taught at any time during the two years prior to application.

Similar situations were addressed in letters received from a teacher who at the request of the school district went back to school for special education during the 1968-69 school year (T. 60), and a teacher who had similarly gone to graduate school and had even taught that year as a graduate assistant outstate. (T. 69) Educational leaves of absence would not count as being "employed" under the proposed rule.

16. That a letter from another teacher indicated that under the rule as proposed, pregnancy leaves would not be taken into consideration even though a teacher was forced to leave. (T. 107) Mr. Mueting then stated that, despite the contrary language of the proposed rule, the Board of Teaching would grant life licensure to such a woman if Federal or State law indicates that her leave, due to the pregnancy should not be the basis of discrimination. (T. 108)

In order to be found reasonable, the language of the rule must specifically apprise affected persons of their rights. If an exception is appropriate for pregnancy leave, teachers should not have to file an application and bring a complaint with the Department of Human Rights to discover whether they will be accorded such treatment. The purpose of the rulemaking process in this proceeding is to specifically set forth a uniform policy governing issuance of life licenses. If it is contemplated that an exception will be granted for pregnancy leaves, the rule must specify the nature of that exception, as to the allowable duration of such leaves, whether males will be included (males are eligible for such "Childbearing/Child Rearing" leave under state personnel rule 2 MCAR Sec. 2.141 and may be also under some school district policies) and whether the leave must be involuntary. Similar explicit treatment must be accorded to the other proposed exceptions such as military service.

Several persons objected strenuously to past case-by-case interpretations and the attendant need to file an application and pay the fee (the state keeps the money even if you do not get a license) to discover what the rule means. One teacher felt that:

> The State Department used me to get some more money. Why didn't they print the whole law in papers and statements sent out to Supt. Offices instead of leaving out certain parts.

17. That the question of whether substitute teaching fulfills the requirements of the proposed rule was raised in another letter. (T. 108) Mr. Mueting stated that in his opinion under the definition of teaching in the proposed rule it is the duration of the teaching and not the type of teaching or the nature of the contract between the teacher and school

district that is relevant. (T. 109) The use of this definition of teacher as stated in Minn. Stat. Sec. 179.63, subd. 7 (1978) (P.E.L.R.A. - the Public Employment Labor Relations Act) to accomplish this, prompted considerable discussion.

The proposed definition would exclude part-time teachers whose service did not exceed the lesser of 14 hours per week or 35% of the normal workweek in the employee's bargaining unit. (T. 34) Mr. Rapp explained that the reason for the Board of Teaching's reference to this statute was because of the vagueness of a term such as full-time which can mean five hours of teaching in one school district and six hours of teaching in another district. He stated that this was the Board of Teaching's intent to have a concrete definition of teacher. (T. 50) The result of applying this variable part-time standard will be that a teacher working nine hours a week in a district with a five hour working day will qualify for life licensure, while another working 13 hours a week in a district with an eight hour work day will not.

Under the proposed definition a teacher who began teaching in March of 1969 and completed the remainder of the school year as a full-time teacher may not qualify as a teacher during the 1968-69 academic year if he or she did not work for more than 100 days (T. 46) depending on whether the position was "of a basically temporary or seasonal character". A teacher at the hearing was particularly concerned over this aspect of the definition:

> I was employed in the 1968, '69 school year in St. Cloud Public Schools. I was employed to replace a teacher who was leaving for maternity leave. I believe my contract was issued, like, December 8th, and I worked -- I was just sitting there trying to figure it out, and I think I came up with 96 days that year as a Second Grade classroom teacher. I don't know if I hit the hundred or not, and you've got me very worried all of a sudden. I was a full-time teacher. I was under contract. I still have my contract; and are you -- Is it your intent to follow P.E.L.R.A. to the letter on those hundred days or do you intend to allow those of us who taught that school year or for as much of it as we could get a job? (T. 49)

Mr. Rapp's response was equivocal, indicating in part, "I can't interpret individual cases in any way, and I don't think I'll be able to do it five years from now." Mr. Mueting stated that although the definition of teacher in P.E.L.R.A. was intended by the Legislature to spell out who will be a teacher for purposes of bargaining with the School Board, the Board of Teaching feels it is appropriate to incorporate this definition into this proposed rule. (T. 47, 48)

The definition of teacher that the proposed rule incorporates also specifically excludes commissioned or enlisted personnel of the Minnesota National Guard. (T. 103) Mr. Waddick stated that the Board of Teaching was not instructed or advised to exclude this group of individuals in their negotiations with the Department of Education leading to the proposed rule. (T. 97) Mr. Rapp stated that the Board's intent of including Minn. Stat. Sec. 169.63 was only to take care of the problem of full and part-time. (T. 103)

18. That a teacher who had been drafted out of his teaching job in 1968 complained that he would not be eligible for life licensure under the

proposed rule. (T. 51) Mr. Mueting stated that although it was the Board of Teaching's position that such an individual should not qualify for life licensure, he may be entitled to it through some Federal legislation protecting people who were drafted. (T. 85)

19. That the Minnesota School Board Association opposes 5 MCAR Sec. 3.002 because the proposed rule seriously endangers the effectiveness of the state's continuing education efforts. It contends by letter that:

> Briefly the facts which support rejection of the proposed rule are as follows:
>
> 1. The legislature has passed legislation which abolished life licensure in 1969.
>
> 2. A system of continuing education has been in existence since 1971. That system has been working well and has just undergone extensive review by the Board of Teaching.
>
> 3. Statistical evidence exists that clearly indicates the proposed rule would create the potential to effectively curtail the state program of continuing education. That statistical evidence is as follows:
>
> a. F.T.E. (Full Time Equivalent) staffing numbered 50,640 in 1977-78. Approximately 48,000 of these are classroom teachers.
>
> b. Over 77% of all F.T.E. professional staff are over 30 years of age. 48% are in the age range of 30-44.
>
> c. Over 52% of all F.T.E. professional staff have logged eleven or more years of educational experience.
>
> d. Declining enrollments are leading to staff reductions particularly in the elementary and secondary licensure areas. Special education hiring often skews reduction data. Staff reduction is based on seniority with younger teachers laid off first.
>
> e. A 1977 computer search conducted by the State Department of Education indicated that 23,000 persons hold renewable licenses with no life license appearing as a function thereon. It also showed that well over 10,000-15,000 teachers held life licenses as a major function of their license.
>
> 4. The proposed rule allows anyone who was teaching in the 1968-69 school year and who taught a minimum of five years to obtain a life license. When this criteria is applied to the statistical data above, the realistic prediction is that 10,000-15,000 teachers would be eligible for a life license. Thus, anywhere from 20,000-30,000 teachers could be in possession of a life license by July 1, 1980. The impact of those kinds of numbers upon continuing education is obvious.

In relation to the estimated number of teachers with renewable licenses (23,000) and those who could get life licenses under the proposed rule (10,000-15,000), Mr. Rapp stated that it is improper to subtract the figure of 10,000 to 15,000 from 23,000 unless every one of those licenses was held in that year immediately preceding July 1, 1969. (T. 121) Dr. Droubie also stated that

he thought the figures were inaccurate in terms of the proposed rule and emphasized the point that teachers have any number of "areas" or fields listed on their license and while they may qualify for a life license for a field under the proposed rule, they may have other fields that they will have to continue to renew. (T. 119, 120) He indicated at the hearing, "I could check that out and get back to you, but I don't think that's accurate." He did not, however, provide any specific contrary figures as to the effect of the proposed rule at or after the hearing.

Mr. Waddick then stated that he found "no direct adverse financial impact to school districts with which the M.S.B.A. should be concerned". He also did not supply any specific figures on these impacts. (T. 124)

20. That the Board of Teaching had also not done any cost implication study on the impact of the proposed rule on teachers. (T. 123) The Board of Teaching confirmed that the licensing fees are basically set to recover the costs of that Board. If the conservative figure of 10,000 teachers is used as the number that will be exempted from future renewal over the next 20 years (at the present fee level) some $600.000 in costs will be shifted to the teachers who will continue to be forced to periodically renew their licenses. The fees for these 25% of the teachers would have to be increased some 75% as a result of this shift. If the same inflation rate occurs over the next 20 years that has occurred over the last 20 years, the renewal fee for these teachers could jump from $20 to $245. Mr. Mueting stated at one point that if the economic impact is deemed relevant to assessing reasonableness, "there should be a study to consider the effect based on projected figures by the Department . . . ." None has been done. (T. 114, et seq.)

21. That the Board of Teaching has also not studied the impact of the proposed rule on institutions of higher education. Mr. Lowell Gillett, a member of the Board of Teaching representing higher education institutions, stated that although the proposed rule would probably have some undetermined negative impact on higher educational institutions (because fewer teachers would seek continuing education) he did not think it would have a major impact. (T. 126) No specific factual data was presented on this impact.

22. That no analysis was presented of the job implications of the proposed rule for the 25% of the teaching population that will continue to be subject to continuing education requirements. Letters indicated that these teachers will be adversely affected:

> Because teachers without life licenses have needed to acquire credits beyond their degree rather rapidly, the teachers have moved quickly to the higher-cost lanes on the salary schedules. This has cost many thousands of dollars to local school districts. It has also caused many local school boards to take their second or third choices for teaching positions rather than their first choice to stay within budget limitations.

Another letter confirms that this is a real problem for such teachers, "I was fortunate to get a 1 year position but with all my credits I am too expensive to hire. (Do you realize I am at the second to last lane in most districts?)" (Emphasis original.)

23. That in response to the question of whether the Board of Teaching intended to include "elementary school limited certificates" (which were explicitly not to be eligible for permanent certificates under the law that was repealed - Minn. Stat. Sec. 125.07, subd. 2 (1967)), Dr. Droubie stated that "these individuals were never issued life licenses on any other previous system or set of criteria "and were not intended to be included under the rule. (T. 104, 105) The rule as proposed, however, would not explicitly exclude such teachers. No rationale was advanced for excluding these teachers while including "provisional" licensees as hereinafter discussed.

24. That referring to the same repealed statute, which also denied permanent certificates to those holding recreation certificates, Dr. Droubie stated that those individuals would be eligible under the proposed rule (T. 105, 106) as there has been a license for recreation personnel since 1962. (T. 111) As proposed, there is nothing in the rule to distinguish these included licenses from the excluded elementary limited certificates. No reason was advanced for reversing the Legislature's judgment in the original statute that refused to grant permanent certificates to recreation licensees.

25. That a letter from a teacher who is a social worker prompted the question of whether or not she would be included under the proposed rule. (T. 102) Dr. Droubie stated that school social workers, school psychologists and counselors are included under the definition of teacher under the proposed rule but principals, superintendents, vocational teachers, physical therapists and occupational therapists are not. (T. 102) Mr. Peatross explained that this is because the latter groups of individuals is not now and in some cases has never been licensed by the Board of Teaching. (T. 103)

26. That the situation of a teacher who taught in a Head Start program in 1968-69 prompted Mr. Droubie to state that such an individual could be eligible for life licensure under the proposed rule if he or she held a license appropriate to that assignment even though the Department of Education does not enforce licensure on Head Start programs. (T. 113, 114)

This indicates an intention by Board Staff to use considerable discretion in loosely interpreting the definition of "teacher" in the 1968-69 limitation which says that the teacher must be employed "in a position for which the person must be certificated by the State Board of Education . . . ."

Dr. Droubie also indicated that persons teaching under a "provisional" license in 1968-69 might qualify for life licensure even though they were not qualified for full licensure at that time. ". . . (Y)ou have to spend case-by-case (sic) and get their file out and, you know, really just look at them and examine their experience and so on." (T. 111)

27. That in addition to those letters referred to at the hearing and in this Report, several hundred were received mainly from individuals supporting the proposed rule. Typical of these letters is the following:

> In response to the hearing on Life Licenses, I am writing to say I am totally in favor of allowing teachers who were employed prior to 1968 apply (sic) for life certificates -- mainly because I am one who will benefit by this. I was hired in 1968 and worked 9 months prior to 1969.

28. That no justification was advanced for failing to require any continuing education requirements whatsoever as a condition of the proposed "life licenses", other than a questionable legal interpretation. Several letters urged that such requirements be included. A troubled 6 year continuing education chairman wrote, for example:

> What made my job difficult were questions I could not answer. Why would some of us have to take Continuing Ed and others not? Why should we who just graduated need refresher courses while those who graduated 20 years ago need not? I tried to assure them eventually everyone will have to take Continuing Ed. Instead the MEA extended Life Certificates to more teachers making Continuing Ed even more unfair.

Another teacher thoughtfully discusses the situation and concludes:

> In the final analysis, I'm not in favor of a license to do nothing . . . . (A)s the situation presently is, I would have to be in favor of life licenses with the stipulation that individuals actively participate in professional growth opportunities -- such as the credit renewal system presently in use.

Other teachers who supported the proposed rule felt strongly that all teachers should be treated uniformly and as a Hopkins teacher concluded, if there are going to be continuing education requirements for some experienced teachers then "they should make laws which affect the recertification requirements of all teachers. A life certificate should not be an end in itself." (Emphasis original.)

The Board of Teaching has generally strongly agreed with the position expressed by the above teachers, stating in a statement of need in an earlier rule proceeding, "The highest attainment in teaching should be permanent licensure, subject to regular growth activities, which includes commitments to continuing education." Mr. Rapp, the author of that Board position refused to answer the question of whether this proposed rule exempting perhaps 20% of the teaching force from continuing education requirements would "undermine or work contrary to that principle". (T. 141) The proposed rule would allow life licensees to drop out of teaching entirely for an extended period and come back without taking a single refresher course. Mr. Rapp somewhat reluctantly admitted that in his judgment allowing teachers to drop out for five or more years without some updating was unreasonable, "speaking for myself, not only would that not be reasonable, nor anything else". The other Board members were specifically asked if anyone disagreed with Mr. Rapp's conclusion and none did. (T. 130)

One member of the Board added that they were proposing this rule that they all agreed was unreasonable because of the "statute established by the Legislature -- we cannot add to that". In the first place, the statute merely authorizes establishment of some kind of system of life licenses "according to the requirements established by the board of teaching". (Minn. Stat. Sec. 125.185) It does not mandate that the Board adopt any rule, and certainly not one that the Board feels is unreasonable. Secondly, this legal interpretation ignores the careful distinction drawn by the Legislature between the abolished "permanent certificates" (1969) and the newly authorized "life licenses" (1973 amendment to the section cited above).

This distinction and the above cited language can be interpreted as permitting the Board of Teaching to establish some reasonable continuing education requirements for life licenses. This legislative concern for continuing education was expressly noted in a special section of this 1973 statute authorizing life licenses (Laws of 1973, Chapter 749, section 13) which provided in part, "The present rules and regulations of the state board of education shall continue in full force and effect relative to teacher certification and approval of teacher preparation programs until superseded."

29. That proposed 5 MCAR Sec. 3.142 is needed to establish in the form of a written rule that which has been practiced over a number of years. (T. 143) The proposed rule would authorize the granting of licenses to teachers prepared in states which have signed contracts with Minnesota. This would meet the requirements of Minn. Stat. Sec. 125.52 and allow the establishment and continued verification of criteria for teacher education programs that may meet the test of "essential equivalence" to those found in Minnesota. The proposed rule also establishes criteria for granting licenses to teachers prepared in states not contracting with Minnesota for reciprocity in licensing.

Support for 5 MCAR Sec. 3.142 was expressed by the Department of Education and the Office of the Commissioner, the Minnesota Federation of Teachers and the Minnesota Education Association. (T. 142-144) There was no opposition to this proposed rule.

CONCLUSIONS

1. That any of the foregoing Findings of Fact which are more properly denominated Conclusions are hereby adopted as such.

2. That the Board of Teaching duly acquired and now has jurisdiction over the within proceeding.

3. That all substantive and procedural requirements of statute or rule have been complied with.

4. That pursuant to Minn. Stat. Sec. 15.052, subd. 3 (1978), it is the duty of the Hearing Examiner to: ". . . (4) make a report on each proposed agency action . . . taking notice of the degree to which the agency has (i) documented its statutory authority to take the proposed action, . . . and (iii) demonstrated the need for and reasonableness of its proposed action with an affirmative presentation of facts." The Board of Teaching has not documented its statutory authority to take the proposed action and has not documented either the need for or the reasonableness of its proposed rule relating to life licenses by an affirmative presentation of facts.

5. That the evidence and testimony herein establishes that it is inequitable to require continuing education for some teachers while totally exempting a select group of other teachers with equal qualifications and experience. The proposed rule would aggravate and compound this inequity. After withdrawing that portion of the testimony and statement of need alleging a contractual right to life licensure, the sole basis remaining for asserting a need for the proposed rule is "to hereby grant life licensure, as required by statute, to those limited number of senior teachers who hold a justifiable

claim to such status". (Ex. 9 - Statement of Need) This is insufficient documentation of the need for the rule herein proposed.

6. That the proposed rule on life licenses is contrary to the legislative intent of the authorizing statute establishing a category of "life licenses" by limiting it to 1968-69, non-pregnant, non-soldier, non-student, instate, non-national guard, non-disabled, etc., actively licensed teachers who apply prior to 1980.

7. That without further analysis, reference to subtle negotations between the Board of Teaching and the Department of Education do not constitute documentation of the need for or the reasonableness of the proposed rule relating to life licenses by an affirmative presentation of facts.

8. That insofar as the proposed rule on life licenses would grant what amounts to permanent certificates to teachers who were eligible to receive such certificates on July 1, 1969; it is contrary to Minn. Stat. Sec. 125.071 which provides that applications from those teachers must be "submitted to the Department of Education prior to July 1, 1975".

9. That proposed rule 5 MCAR Sec. 3.002 is also unreasonable because it does not clearly address the situations of teachers who may have been on a leave (e.g., educational, maternity, sickness, disability, administrative, personal, sabbatical or military) or drafted into the armed services (or volunteered). The status of such individuals must be clarified by amending the proposed rule to notify these individuals as to whether or not they fall under the proposed rule. Drafting of such clarification is properly the function of the proposing agency not the Hearing Examiner. The necessary revisions will result in a rule fundamentally different from that contained in the notice of hearing, requiring a reconvened hearing.

10. That the Board of Teaching has demonstrated the need for and reason-reasonableness of proposed 5 MCAR Sec. 3.142 by an affirmative presentation of facts.

RECOMMENDATIONS

IT IS HEREBY RECOMMENDED: That the Board of Teaching redraft the proposed rule 5 MCAR Sec. 3.002 relating to life licenses in accord with this Report and repromulgate it after a further hearing thereon; and

IT IS FURTHER RECOMMENDED: That the Board of Teaching adopt the proposed rule 5 MCAR Sec. 3.142 relating to granting of licenses to teachers prepared in other states.

Dated: February 26, 1979.

HOWARD L. KAIBEL, JR.
Hearing Examiner

STATE OF MINNESOTA

BOARD OF TEACHING

CERTIFICATE OF BOARD'S ADOPTION
OF RULES RESOLUTION

I, Margery H. Harris, do hereby certify that I am Secretary of the Board of Teaching, a board duly authorized under laws of the State of Minnesota, and that the following is a true, complete, and correct copy of a resolution adopted at a meeting of the board on March 16, 1979, that a quorum was present at said meeting; that a majority of those present voted for the resolution; that said resolution is set forth in the minutes of said meeting and has not been rescinded or modified.

> "RESOLVED that in support of the adoption of 5 MCAR 3.142 Teachers Prepared in States Other than Minnesota, presented for hearing by the Board of Teaching at the public hearing on January 20, 1979, the Board of Teaching adopts the Findings of Fact and Conclusions of Hearing Examiner Kaibel dated February 26, 1979,
>
> And, that the rule relating to Teachers Prepared in States Other than Minnesota be and is hereby approved and adopted, pursuant to the authority vested in us by M.S. 125.185, and Joseph Moren, Chairman of the Board of Teaching, be and hereby is authorized to sign an order adopting this rule."

IN WITNESS WHEREOF, I have hereunto subscribed my name this 16th day of March, 1979.

Margery H Harris
Secretary

ATTEST:

Jo Malmsten
Vice Chairman

1-20-79
MKW

MINNESOTA BOARD OF TEACHING

607 CAPITOL SQUARE BUILDING
550 CEDAR STREET
ST. PAUL, MINNESOTA 55101
(612) 296-2415

KENNETH L. PEATROSS
EXECUTIVE SECRETARY

KATHRYN C. RAYBURN, Chairman
513 - 32nd Street Northeast
Rochester, Minnesota 55901

JOSEPH J. MOREN, Vice-Chairman
304 East 32nd Street
Hibbing, Minnesota 55746

MARGERY H. HARRIS, Secretary
4624 Colfax Avenue South
Minneapolis, Minnesota 55409

ROBERT J. CASANOVA
982 South Market
Shakopee, Minnesota 55379

WILLIAM E. GARDNER
104 Burton Hall
University of Minnesota
Minneapolis, Minnesota 55455

LOWELL GILLETT
St. Cloud State University
St. Cloud, Minnesota 56301

EDWARD HUDOBA
United Labor Center
312 Central Avenue - Room 356
Minneapolis, Minnesota 55414

LUCILLE L. KAINU
590 Highway 33 North
Cloquet, Minnesota 55720

JO MALMSTEN
5350 Shady Hills Circle
Shorewood, Minnesota 55331

MARIE McNEFF
Augsburg College
Minneapolis, Minnesota 55454

CARL H. NEVILS
20200 Vance Street
Elk River, Minnesota 55330

ADDIE PERL
2240 Drew Avenue South
Minneapolis, Minnesota 55416

EDWARD A. RAPP
9955 Grouse Street Northwest
Coon Rapids, Minnesota 55433

AARON RUPERT
1409 West Minnehaha Avenue
St. Paul, Minnesota 55104

SISTER MARY DENISE VILLAUME
2475 Dodd Road
St. Paul, Minnesota 55120

NOREEN WELCH
209 North Estey Avenue
LuVerne, Minnesota 56156

DOLORES WINDINGSTAD
Route #1, Box 41
Dawson, Minnesota 56232

TO : Steve Mihalchick
Hearing Examiner

FROM : Kenneth L. Peatross, Executive Secretary
MINNESOTA BOARD OF TEACHING

K Peatross

DATE : December 29, 1978

SUBJECT: Board of Teaching Licensure Rule Public Hearing
January 20, 1979

This is to advise you that the notice of the proposed adoption of rules governing teacher licensure in Minnesota together with proposed rules scheduled for public hearing on January 20, 1979, were published in the December 18, 1978, edition of the Minnesota State Register.

The Board of Teaching will propose the following motion at the public hearing:

--That 5 MCAR § 3.002 proposed rule governing procedures for the issuance of life licenses be revised to read:

A. Any teacher currently holding a license in Minnesota having a minimum of five years teaching experience in the State of Minnesota and subject to the rules of the Board of Teaching who was actually employed as a teacher in the state of Minnesota, as defined in Minnesota Statutes 179.63, in the school year immediately preceding July 1, 1969, may apply for and shall receive a life license applying to the ~~grades-and-subjects-taught-and-licenses held~~ licenses held in the school year immediately preceding July 1, 1969, upon payment of fees as established by the Board of Teaching provided that the application is submitted to the Department of Education prior to July 1, 1980.

B. This rule shall expire July 1, 1980, without further action by the Board of Teaching.

KLP/nad

cc: Donald J. Mueting

AN EQUAL OPPORTUNITY EMPLOYER

Minnesota Board of Teaching
Proposed Rules

5 MCAR § 3.002 Procedures for the issuance of life licenses. (All new material.)

A. Any teacher currently holding a license in Minnesota having a minimum of five years teaching experience and subject to the rules of the board of teaching who was actually employed as a teacher in the state of Minnesota, as defined in Minnesota Statutes 179.63, in the school year immediately preceding July 1, 1969, may apply for and shall receive a life license applying to the grades and subjects taught and licenses held upon payment of fees as established by the board of teaching provided that the application is submitted to the department of education prior to July 1, 1980.

B. This rule shall expire on July 1, 1980, without further action by the board of teaching.

5 MCAR § 3.142 Teachers prepared in states other than Minnesota.

A. Licenses to teach in Minnesota shall be granted to persons who otherwise meet applicable statutory requirements and who complete programs leading to teacher licensure in teacher preparation institutions located outside Minnesota. Such licenses shall be granted only in licensure fields for which the board of teaching has established rules governing programs leading to teacher licensure. Such licenses shall be issued according to either 1. or 2. as follows:

1. Persons who complete approved programs leading to teacher licensure in teacher preparation institutions within states which have signed contracts with Minnesota according to the provisions of the interstate agreement on qualification of educational personnel shall be granted a Minnesota entrance license. No licenses shall be issued on the basis of teaching experience only.

2. Persons who complete programs leading to teacher licensure in teacher preparation institutions within states which have not signed contracts with

Minnesota according to the provisions of the interstate agreement on qualification of educational personnel shall be granted a Minnesota entrance license when all of the following criteria are met:

a. The teacher preparation institution is regionally accredited by the association for the accreditation of colleges and secondary schools.

b. The program leading to teacher licensure has been recognized by the state as qualifying the applicant completing the program for such licensure within that state.

c. The program leading to teacher licensure completed by the applicant is essentially equivalent in content to approved programs offered by Minnesota teacher preparation institutions according to board of teaching rules governing the licensure field.

d. The teacher preparation institution which offers the program leading to licensure verifies that the applicant has completed an approved teacher licensure program at that institution and recommends the applicant for a license in a licensure field at a licensure level.

e. The applicant has completed a major or minor program leading to teacher licensure as verified by the transcript issued by the institution recommending the applicant for licensure.

f. The applicant has completed student teaching in the licensure field and at the licensure level of the program.

B. Notwithstanding the rule governing human relations, persons who have been prepared as teachers in states other than Minnesota shall be granted a Minnesota entrance license based upon the provisions of this rule.

Exh. #6
1-20-79
MKW

STATE OF MINNESOTA
COUNTY OF RAMSEY

CERTIFICATE

In the matter of the Proposed Adoption of Rules of _____ Division Governing Board of Teaching

---

I hereby certify that the attached 58 labels - 2 sheets constitute the complete list of persons, associations, and other interested groups who as of 9:15 o'clock A .M, this 19th day of Dec, 19 78, have requested pursuant to M.S. 19 76, 15.0413, that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearing on proposed rules on the subject captioned above.

Secretary of State
Joan Anderson Growe

By Kathy Gjelos

ADDITIONAL NAMES FOR GENERAL MAILING LIST

American Camping Assn., 4132 88th. Lane, St. Paul, Mn. 55112

Loch, David Region 5 Regional Dev. Comm. 611 Iowa Ave., Staples, Mn. 56479

Wilson, Rosemary, Minn. Hospital Association, 2333 Univ. Ave. SE, Mpls, Mn. 55

Minnesota Express Inc. Box 427 Willmar, Minnesota 56201

Independent School District #518, PO Box C, Worthington 56187

Nielsen, Lloyd C., Supt.Roseville Area Schools, 1251 W Co Rd B-2, Roseville 5511

Nypen, Burton L., Supt.Ortonville Public Schools, Box 247, Ortonville 56278

O'Neil, James F., Supt.Ind. School Dist. #638, Sanborn 56083

Park Rapids Area Schools Dist. #309, Park Rapids 56470 Attn: Fred Bettner

Schmidt, H.A., Supt,Ind. School Dist. #314, Braham, 55006

helstad, Roger, & Holm, Don, Renville Public School, Renville 56284

uth St Paul Public Schools, 125-6th Ave N, So St Paul 55075 Attn: Roger Buett

, Jan, Route 4, Valley View Estate #11, Montevideo 56265

ANDERSON HAROLD
BOX 3047
MANKATO MN
56001

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANTHONY DICK WDSM RADIO
230 E SUPR ST
DULUTH MN
55102

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ARROWHEAD REGIONAL DEV COMM
200 ARROWHEAD PLACE
DULUTH MN
55802

ASH GEORGE
3040 OTTAWA STREET
ST LOUIS PARK MN
55416

ASSN OF MINN COUNTIES
2305 FORD PKWY
ST PAUL MN
55116

ASSN RESIDENCES FOR RETARDED
459 RICE SUITE 301
ST PAUL MN
55103

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BARATTO DIVINE M
1192 BUSH ST
ST PAUL MN
55106

BECK PAT
953 HYACINTH AVE
ST PAUL MN
55106

BEGALKA D REV
212 N ELK ST
BELLE PLAINE MN
56011

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BEST FLANAGAN ET AL
4040 IDS CENTER
MPLS MN
55402

BLADIN PAPER CO W J LICKE
115 1ST ST SW
GRAND RAPIDS MN
55744

BLOMQUIST BARRY L

NORTH BRANCH MN
55056

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRICK PHILIP D
807 SELLWOOD BLDG
DULUTH MN
55802

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

BROWN D M GOODRIDGE PUB SCH
IND DIST #561
GOODRIDGE MN
56725

BRUNING U.A.DEPT.CLINIC.EXP.
BURTON HALL
MPLS. MN
55455

BUSCH NOEL
SUITE 705 510 MARQUETTE
MPLS MN
55402

NDERSON DEBRA
115 E RIVER ROAD
PLS MN
5414

NDERSON MARY
425 RUTLEDGE AVE
INA MN
5436

RROWHEAD ECONOMIC OP AGENCY
S BRUSTON BOX 1066
IRGINIA MN
5792

SMUSSEN, DENNIS, MPIRG
036 UNIV AVE SE
PLS MN
5414

ARRETT FRED
LOUIS CO COURT HOUSE
LUTH MN

MIDJI STATE COLLEGE
ACEMENT BUR.J.C.BRADY
MIDJI MN
601

UTEL ROBERT
00 SILVER LAKE RD
W BRIGHTON MN
112

LOOMINGTON CITY CLERK
15 W OLD SHAKOPEE RD
LOOMINGTON MN
431

IGGS & MORGAN - B F FRIEL
00 W 1ST NATL BK BLDG
PAUL MN
101

N H D
1 KINGSBERRY LANE
NETONKA MN
43

HOLTZ CHARLES
BRENT AVE E
GRV HTS MN
75

ANDERSON HERBERT
418 6TH ST. SO.
VIRGINIA MN
55792

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

ARROWHEAD REG. DEV COMM.
211 W 2ND ST
DULUTH MN
55802

ASSOCIATED GEN CONTROF MN
48 E 8TH STREET
ST PAUL MN
55101

BABCOCK LOCHER NELSON ET
118 E MAIN ST
ANOKA MN
55303

BARTHOLOW HAROLD E FIRE C
2600 109 AVE N W
COON RAPIDS MN
55433

BENDA GEORGE
RURAL ROUTE 1
ALPHS MN
56111

BINGHAM KE CRIM JUSTICE C
351CITY HALL ANNEX
ST PAUL MN
55102

BROEKER JOHN
2850METRO DR. SUITE 504
BLOOMINGTON MN
55420

BRUBACHER RICHARD COMM AD
208 ADM BLDG
ST PAUL MN
55101

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

BURLENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

CAIN RUTH
730 E 38TH ST
MPLS MN
55407

CAIRNS JOHN A
47TH FLR IDS CENTER
MPLS MN
55402

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHIEF EDITOR ST INFO UNIT
1231 25TH ST NW
WASHINGTON DC
20037

CHILDS J L
4012 LYNN AVE S
MPLS MN
55416

CHRYSALIS CENTER FOR WOMEN
2104 STEVENS AVE S
MPLS MN
55404

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CITY OF ALBERT LEA
221 E CLARK ST
ALBERT LEA MN
56007

CITY OF ALEXANDRIA
114 7TH AVE W BOX 231
ALEXANDRIA MN
56308

CITY OF APPLE VALLEY
14200 CEDAR AVE SO
APPLE VALLEY MN
55124

CITY OF BLAINE
9150 CENTRAL AVE NE
BLAINE MN
55434

CITY OF BRECKENRIDGE
CITY HALL
BRECKENRIDGE MN
56520

CITY OF BROOKLYN CENTER
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

CITY OF BURNSVILLE
1313 E HWY 13
BURNSVILLE MN
55337

CITY OF CAMBRIDGE
139 E FIRST AVE
CAMBRIDGE MN
55008

CITY OF CHANHASSEN
7610 LAKEDA
CHANHASSEN MN
55317

CITY OF CHASKA
235 E 4TH ST
CHASKA MN
55318

CITY OF COLUMBIA HEIGHTS
590 40TH AVE NE
COLUMBIA HGHT MN
55421

CITY OF COON RAPIDS
1313 COON RAPIDS BLVD
COON RAPIDS MN
55433

CITY OF CRYSTAL
4141 DOUGLAS DRIVE NO
CRYSTAL MN
55422

CITY OF DEEPHAVEN
20225 COTTAGEWOOD RD
DEEPHAVEN MN
55331

CABLE COMM SYST-H ARRAZI
BOX 777
HECTOR MN
55342

ARLSON CARL L
016 80TH ST S
ITTAGE GROVE MN
5016

CARLSON VERNE E
BOX 755 CITY HALL
WILLMAR MN
56201

AVARRIA ADAM
325 W 251/2 ST APT 206
PLS MN
5405

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

HRISTIAN SCI COMM ON PUB
021 UNIV AVE SUITE 271
PAUL MN
5104

CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

ITIZENS LEAGUE
30 SYNDICATE BLDG
PLS MN
5402

CITY OF ABERDEEN
CITY HALL
ABERDEEN SD
57401

ITY OF ANDOVER
685 CROSSTOWN BLVD NW
NOKA MN
5303

CITY OF ANOKA
CITY HALL 2015 1ST AVE
ANOKA MN
55303

ITY OF BLOOMINGTON
15 W OLD SHAKOPEE RD
OOMINGTON MN
5431

CITY OF BRAINERD
CITY HALL
BRAINERD MN
56401

ITY OF BROOKLYN PARK
300 85TH AVE NO
ROOKLYN PARK MN
5443

CITY OF BUFFALO
212 CENTRAL AVE
BUFFALO MN
55313

ITY OF CARVER COUNTY
0 E FOURTH ST
ASKA MN
5318

CITY OF CHAMPLIN
12001 HWY 52
CHAMPLIN MN
55316

TY OF CIRCLE PINES
31 LEXINGTON AVE NO
RCLE PINES MN
014

CITY OF CLEAR LAKE
ROUTE 1
CLEAR LAKE MN
55319

Y OF COTTAGE GROVE
S 80TH ST SE
TAGE GROVE MN
016

CITY OF CROOKSTON
PO BOX 374
CROOKSTON MN
56716

Y OF DETROIT LAKES
E HOLMES ST
ROIT LAKES MN
561

CITY OF DODGE CENTER
CITY HALL
DODGE CENTER MN
55927

CITY OF DULUTH
CITY HALL
DULUTH MN
55802

CITY OF EAGAN
3795 PILOT KNOB ROAD
EAGAN MN
55122

CITY OF EDEN PRAIRIE
8950 EDEN PRAIRIE RD
EDEN PRAIRIE MN
55343

CITY OF EDINA
4801 w 50TH ST
EDINA MN
55424

CITY OF GOLDEN VALLEY
7800 GOLDEN VALLEY RD
GOLDEN VALLEY MN
55427

CITY OF HAM LAKE
15544 CENTRAL AVE NE
ANOKA MN
55303

CITY OF HUTCHINSON
37 WASHINGTON AVE WEST
HUTCHINSON MN
55350

CITY OF INVER GROVE HTGS
8659 COURT HOUSE BLVD
INVER GROVE MN
55075

CITY OF LAKE ELMO
11194 UPPER 33RD ST
LAKE ELMO MN
55042

CITY OF LAKE INDEPENDENCE
RT 1 BOX 123A
MAPLE PLAIN MN
55359

CITY OF LITTLE CANADA
515 LITTLE CANADA RD
LITTLE CANADA MN
55117

CITY OF LITTLE FALLS
100 7TH AVE NE
LITTLE FALLS MN
56345

CITY OF MENDOTA HEIGHTS
BANK BLDG 750 S PLAZADR
ST PAUL MN
55120

CITY OF MINNEAPOLIS
300 PUBLIC SERVICE CTR
MPLS MN
55415

CITY OF MOORHEAD
BOX 779 CITY HALL
MOORHEAD MN
56560

CITY OF MORRIS
CITY HALL
MORRIS MN
56244

CITY OF NEW BRIGHTON
803 5TH AVE NW
NEW BRIGHTON MN
55112

CITY OF NEW HOPE
4401 XYLON AVE NO
NEW HOPE MN
55428

CITY OF OSSEO
PO BOX 66
CRYSTAL BAY MN
55323

CITY OF PLYMOUTH
3025 HARBOR LANE
PLYMOUTH MN
55441

CITY OF RED LAKE FALLS
BOX 445
RED LAKE FALL MN
56750

CITY OF RICHFIELD
6700 PORTLAND AVE
RICHFIELD MN
55423

CITY OF ROSEMOUNT
BOX 450
ROSEMOUNT MN
55068

CITY OF ROSEVILLE
2701 NO LEXINGTON AVE
ROSEVILLE MN
55113

ITY OF EAST BETHEL
751 VIKING BLVD NE
YOMING MN
5092

CITY OF E GRAND FORKS
P O BOX 453
E GRAND FORKS MN
46721

ITY OF FAIRMONT
4 E 1ST ST
IRMONT MN
031

CITY OF FRIDLEY
6431 UNIVERSITY AVE NE
FRIDLEY MN
55432

ITY OF HASTINGS
0 SIBLEY ST
STINGS MN
033

CITY OF HOPKINS
1010 1ST ST SO
HOPKINS MN
55343

ITY OF JACKSON
ITY HALL
CKSON MN
143

CITY OF LACRESCENT
PO BOX 142
LACRESCENT MN
55947

ITY OF LAKEVILLE
30 207TH ST W
KEVILLE MN
044

CITY OF LITCHFIELD
126 NO MARSHALL
LITCHFIELD MN
55355

ITY OF MAPLE GROVE
01 FERNBROOK LANE
PLE GROVE MN

CITY OF MAPLEWOOD
1380 FROST AVE
MAPLEWOOD MN
55109

ITY OF MINNEPOLIS
01 66TH AVE NO
OOKLYN CTR MN
429

CITY OF MINNETONKA
74600 MINNETONKA BLVD
MINNETONKA MN
55343

TY OF MOUNDSVIEW
01 HWY 10
PAUL MN
113

CITY OF MOUNTAIN LAKE
CITY HALL
MOUNTAIN LK MN
56159

ITY OF NORTHFIELD
4 SO DIVISION
RTHFIELD MN
057

CITY OF OAKDALE
1584 HADLEY AVE SO
OAKDALE MN
55119

TY OF PROCTOR
2ND ST CITY HALL
CTOR MN
13

CITY OF RAMSEY
14100 ST FRANCIS DR
ANOKA MN
55303

TY OF ROBBINSDALE
LAKE RD
INSDALE MN
2

CITY OF ROCHESTER
1421 3RD AVE SE
ROCHESTER MN
55901

Y OF ST ANTHONY
KENZIE TERRACE
S MN
18

CITY OF ST CLOUD
CITY HALL
ST CLOUD MN
56301

GOLDEN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GOLDBERG PROF MELVIN
WM MITCHELL COL OF LAW
ST PAUL MN
55105

GRANATH MARVIN - HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GREATER MET AREA HOSPITALITY
5152 CEDAR AVE S
MPLS MN
55417

GREEN JANET
9773 N SHORE DR
DULUTH MN
55804

GRUMMERT REV DONALD
1435 ADAMS ST
MPLS MN
55413

H B FULLER CO
2400 KASOTA AVE
ST PAUL MN
55108

HANFT PHILIP M
1200 ALWORTH BLDG
DULUTH MN
55802

HARRY RICK
RT 1 BOX 138
KETTLE RIVER MN
55757

HAUN DR J W GEN MILLS
PO BOX 1113
MPLS MN
55440

HARTFELDT WILL
434 HAMM BLDG
ST PAUL MN
55102

HAVEN ROBT TWIN TN TREATMENT
1706 UNIV AVE
ST PAUL MN
55104

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE
MPLS MN
55440

HEANEY BILL
30 W SUPERIOR ST
DULUTH MN
55802

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HELTZER JAMES DAYTON HUDSON
777 NICOLLET MALL
MPLS MN
55402

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOLEY GEORGE
1509 SW SIXTH STREET
FARIBAULT MN
55021

HORNER WALDORF - KAZIUKEWICZ
PO BOX 3260
ST PAUL MN
55165

HOLT JOHN
517 4TH ST NW
FARIBUALT MN
55021

HOLSTRAND ANDERSON & LARSON
PO BOX 190
WILLMAR MN
56201

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

HYLAND CLAY
1501 S 56TH ST
MPLS MN
55419

[illegible] TEL CABLE TV
[illegible] E SUPERIOR
[illegible]LUTH MN
[illegible]802

[illegible]EEN DEL CITY MGR
[illegible]OOMINGTON CITY HALL
[illegible]OOMINGTON MN
[illegible]431

[illegible]STAFSON WALLACE
[illegible]A 567
[illegible]ELLHAR MN
[illegible]201

[illegible]NSON WARREN A SKELGAS
[illegible] BOX 1650
[illegible]LSA OK
[illegible]102

[illegible]YES, THOMAS W
[illegible]0 SELLWOOD BLG
[illegible]LUTH MN
[illegible]812

[illegible]AD & TRUHN
[illegible]07 SOO LINE BLDG
[illegible]LS MN
[illegible]402

[illegible]ARING EX.OFF. M GREENBERG
[illegible]5 UNIV AVE
[illegible] PAUL MN
[illegible]104

[illegible]NDRICKSON A WM
[illegible]0 FREEMAN DRIVE
[illegible] PETER MN
[illegible]082

[illegible]LMES EUSTIS ET AL
[illegible]10 IDS CENTER
[illegible]LS MN
[illegible]402

[illegible]LE MELVIN
[illegible] W HAY 96
[illegible]RELVIEW MN
[illegible]112

[illegible]EBYE, CRAIG J.
[illegible]5 GRACE S.
[illegible] MN
[illegible]LD

[illegible] PAUL
[illegible] MN

GRAHAM THOS H
854 MIDLAND BK BLDG
MPLS MN
55401

GREEN GARY J
41 SHERBURNE AVE
ST PAUL MN
55102

HAROLD J WESTIN CONSTRUCT
45 E 8TH ST
ST PAUL MN
55101

HART PATRICK V
112 E LIBERTY BOX 3271
MANKATO MN
56001

HEADWATERS REG DEV. COMM
BOX 584 MENTAL HEALTH
BEMIDJI MN
56601

HEIM PAUL M
3944 IDS CENTER 80 S 8
MPLS MN
55402

HENDRICKSON MRS VIRGINIA
3324 COUNTRY WOOD DR
BURNSVILLE MN
55337

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HUTCHISON R.M. ANOKA CO.C
COURT HOUSE
ANOKA MN
55303

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

...NS RED LK MINN
...02 SOO LINE BLDG
...PLS MN
...5402

INTERSTATE POWER R...STEEL
1000 MAIN ST
DUBUQUE IA
52001

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

...ENSEN ARTHUR, CITY CLK
...215 W OLD SHAKOPEE RD
...LOOMINGTON MN
...5431

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

...OHNSON & SANDERSON
...T MARYS HOSPITAL
...OCHESTER MN
...5901

JOHNSON CLARENCE IBEW LU
3615 37TH AVE S
MPLS MN
55406

JOHNSON M.D. FRUVDT & FRUNDT

...LUE EARTH MN
...6013

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

...ABLE RICHARD W

...ETHEL MN
...5006

KAVANEY RICHARD
1220 NORTHERN FED BLDG
ST PAUL MN
55102

...ERVIK DIANE
...02 POWEL HALL U OF M
...PLS MN

KLOSTER MARION PEAVEY CO
730 2ND AVE S.
MPLS MN
55402

...UTSON DR KEITH, BIOLOGY DPT
...ST CLOUD STATE
... CLOUD MN
...301

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

...AMER ERNEST W
...17 DELAWARE ST SE
...PLS MN
...5440

KROEGER CHARLES
122 NW 7TH STREET
FARIBAULT MN
55021

... ENGINEERING INC
...0 S CO RD 18
...LS MN
...426

LANGVIN DAVID
7500 80TH ST S
COTTAGE GROVE MN
55016

...SON HAAS P DEV HOSP SERV
... DELAWARE ST SE
... MN
...40

LEAGUE MN MUNIC
300 HANOVER 480 CEDAR
ST PAUL MN
55101

INGRAM ALAN NASW MN CH
22 NO DALE ST
ST PAUL MN

INGVALSON VERN MN FARM BU
1976 WOODDALE BOX 43370
ST PAUL MN
55164

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

IZAAK WALTON MN DIV
111 E FRANKLIN RM-210
MPLS MN
55404

JASPER GLEN
ROUTE 1
MONTROSE MN
55363

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

JENSEN MRS GAYNOLD
111 WEST 107TH ST
MPLS MN
55420

JOHANSEN BUS SERV INC
19 DAYTON RD
CHAMPLIN MN
55316

JOHNSON G ROBERT
4344 IDS CENTER
MPLS MN
55402

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

JONES C NORTHSIDE RES REDEV
1800 OLSON MEMORIAL HWY
MPLS MN
55411

KEABLE MIKE
909 6TH AVE N
ST CLOUD MN
56301

KEENAN RICHARD J
4444 IDS BLDG
MPLS MN
55402

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KNOPP TIMOTHY
COLLEGE FORESTRY U OF M
ST PAUL MN
55108

KOLLER MR & MRS ERWIN 1
1568 DULUTH ST
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

KRONLOKKEN J E
10045 NORB RD
BLOOMINGTON MN
55437

KROON H CLIFTON
210 E WALNUT
MANKATO MN
56001

LABELLE JOANITA MRS
5816 AQUILA AVE NO
NEW HOPE MN
55428

LAKE SUPERIOR INDUSTRIAL BUR
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LAPP LAZAR LAURIE ET AL
1200 BOILERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LEAGUE WOMEN VOTERS OF MINN
555 WABASHA
ST PAUL MN
55102

LEG.REF.LIB-Z. JEWITT
RM 111 STATE CAPITOL
ST PAUL MN
55155

LEAVEY THOS
629 22ND AVE SE
MPLS MN
55414

LEWIS DR.G.M JR.
ABBOTT 110 E 18TH ST
MPLS MN
55403

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LOGE DOUG
2701 N LEXINGTON AVE
ROSEVILLE MN
55113

MALECKI JAMES
1 SO STATE ST
NEW ULM MN
56073

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANTHEY T J PICKANDS MATHER
1100 SUPERIOR AVE
CLEVELAND OH
44114

MASTOR & MATTSON LTD
315 PEAVEY BLDG
MPLS MN
55402

MCCLURG EUNICE
1061 109TH AVE NE
BLAINE MN
55434

MCDONALD PHILIP M
2077 SELBY AVE
ST PAUL MN
55104

MCNEILLY GREG MNOSVIEW ED AS
41 SHERBURNE AVE
ST PAUL MN
55103

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

METROPOLITAN COUNCIL LIBRARY
300 METRO SQUARE
ST PAUL MN
55155

MEYER HERBERT
10824 ZENITH AVE S
BLOOMINGTON MN
55431

MILLER PAUL J PHARMACY SERV
ST MARYS HOSP
ROCHESTER MN
55901

MILLER RICHARD A
1020 PLYMOUTH BLDG
MPLS MN
55402

MINN ASSN COOPERATIVES
50 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN ELEC COOPERATIVES
4901 W 77TH ST
MPLS MN
55435

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN CHAP ASSOC BLDRS-CONTRS
7204 W 27TH ST
MPLS MN
55426

EG REPORT SERV-P STURDEVA
O BOX 3259
NNAPOLIS MD
2140

IBBEY LEONARD
OX 17011 NOKOMIS STA
PLS MN
5417

UTH SOC SERVICE OF MN
14 PARK AVE
PLS MN
5404

ACLIN ALAN ASST ATTY GEN
20 AMERICAN CENTE BLDG
T PAUL MN
5101

ANKATO STAT STUDENT SENATE
ENTENNIAL STUDENT UN
ANKATO MN
5001

AUL WARREN E
20 S 4TH ST
PLS MN
5415

FADDEN G H DISPATCH-PRESS
E 4TH ST
T PAUL MN
5101

ET. WASTE CONTOL COMM.
50 METRO SQ BLG
T PAUL MN
5101

IDLAND GLASS-HD SPURLING
O BOX 69
HAKOPEE MN
5379

ILLER TOM
511 PILLSBURY AVE S
PLS MN
5404

INN. ASSN. PET RETAILERS
15 2ND AVE. SO.
NNEAPOLIS MN
5403

N COMM FOR HANDICAPPED
TRO SQ 492 7TH & ROBT
T PAUL MN
5101

LEVEY JESS MET STA UNIV
METRO SQ RM 121
ST PAUL MN
55101

LINDALL & JONATHAN DEVELO
VILLAGE ONE CENTER
CHASKA MN
55318

LYNCH DONALD SIBLEY CO
184 E 6TH ST
ST PAUL MN
55102

MAHCF RICK CARTER
2850 METRO DR SUITE 431
BLOOMINGTON MN
55420

MANKATO STATE STUDENT AS
BOX 58 MANKATO COLLEGE
MANKATO MN
56001

MAYO FOUNDATION G ORWOLL
200 FIRST AVE NW
ROCHESTER MN
55901

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MET TFR MEN ASSN A ROSENT
1821 UNIV AVE
ST PAUL MN
55104

MILLER M ADMIN AGENCIES D
G19K STATE ADM BLDG
ST PAUL MN
55155

MINN ASPHALT PAVEMENT ASS
555 WABASHA RM 209
ST PAUL MN
55102

MINN ASSN VOL SOC SERVICE
1821 UNIV SUITE 389
ST PAUL MN
55114

MINN COMMUNITY DEVELOP SE
512 ROSSMOR BLDG
ST PAUL MN
55101

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN GOV ENG COUNCIL
2400 SHERWOOD HILL RD
MINNETONKA MN
55343

MINN HWYS MANAGEMENT SERVICE
307 HWY BLDG
ST PAUL MN
55101

MINN LAND USE COMMITTEE
4344 IDS CENTER
MPLS MN
55402

MINN MULTIHOUSING ASSN
100 W LAKE ST
MPLS MN
55416

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN
55104

MINN RETAIL FEDERATION
180 METRO SQUARE BLDG
ST PAUL MN
55101

MINN STATE BD PHARMACY
717 DELAWARE ST SE #351
MPLS MN
55414

MINN STATE EMP UNION COUN
236 E PLATO BLVD
ST PAUL MN
55107

MINN TEAMSTERS CREDIT UNION
021 HENN AVE E
MPLS MN
55413

MINN TBR PRODUCERS ASSN
200 CHRISTIE BLDG
DULUTH MN
55802

MINN WATER RESOURCES BD
206 555 WABASHA ST
PAUL MN
102

MINN-WISC BOUNDARY AREA C
600 2ND ST
HUDSON WI
54016

ASN.C&IND H.D.PETERSON
0 CEDAR ST.
ST.PAUL MN
55101

MINNESOTA AFL-CIO
175 AURORA AVE
ST PAUL MN
55103

GRAPHIC DESIGNERS ASSO
BOX 24272
MPLS MN
55424

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

ST PHARMACEUTICAL ASSN
69 UNIVERSITY AVE
PAUL MN
114

MN STATE SER BLIND-K NATA
1745 UNIVERSITY AVE
ST PAUL MN
55104

BLOOMINGTON HLTH DEPT
200 PENN SQ
MINGTON MN
51

MORTON BUILDINGS INC
R #1
FOLEY MN
56329

VEHICLE MFRS ASSN
MAIN ST (215)
PAUL MN
102

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

MINN DEPT HEALTH J [redacted]MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN FEDERATED-LJ SCHAFER

BUFFALO LAKE MN
55314

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINN POLLUTION CONTROL AGCY
1935 W CO RD B2
ROSEVILLE MN
55113

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN STATE MEDICAL ASSOC
STE 900 AM NATL BK BLDG
STPAUL MN
55101

MINN. TURKEY GROWERS ASSN
2303 UNIV AVE
ST PAUL MN
55114

MIXA FRANK LK MNTKA CONS DIS
402 E LAKE ST
WAYZATA MN
55391

MN. BD OF NURSING
717 DELAWARE ST SE
MPLS MN
55414

MN REP STATE CENTRAL COMM
555 WABASHA AVE
ST PAUL MN
55102

MN WOMEN POLITICAL CAUCAS
1821 UNIV AVE S291
ST PAUL MN
55104

MOSS DR JEROME
123 PEIK ESY PILLSBURY
MPLS MN
55405

MINNESOTA F[redacted]MERS UNION
1717 UNIVERSITY AVE
ST PAUL MN
55104

MINN. HOTEL & MTR. ASSN
2301 UNIVERSITY AVE
ST PAUL MN

MINN. MTR. TRANSP. .J.N. DENN
1821 UNIV.
ST. PAUL MN
55104

MINN POULTRY & HATCHERY ASSN
BOX 158
MADELIA MN
56062

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN VETERANS MED ASSN
2175 W HWY 36
ROSEVILLE MN
55113

MN AUTOMOBILE DEALERS ASSN
277 UNIV AVE
ST PAUL MN
55103

MN ELECTRICAL ASSN
3100 HUMBOLT SO
MPLS MN
55408

MN SOC SERV ASS J HOOD
614 PORTLAND
ST PAUL MN
55102

MOFFITT R C
RM 301 M MPLS CITYHALL
MPLS MN
55415

MOSTCA
PO BOX J
PERHAM MN
56573

...TAYLOR DIR SEC VC
...A LEARNING CENTER
... - 4TH AVE SO.
...CLOUD MN 56301

... OLSON, V.I.C.A.
...ENHOWER HIGH SCHOOL
... HIGHWAY #7
...KINS MN 55343

...L BEIMERS VOC DIR
... MOUND COOP CENTER
... S. FREEMAN AVE.
...VERNE MN 56156

... STOCK, VOC DIR
...-OAK COOP MULTI-DST VC
... DAKOTA AVE
...PETON N.D. 58075

...NE STUTTLBERG VOC ED
...EST LAKE PUB SCHOOLS
... SW 15TH ST.
...EST LAKE MN -55025

...N. BREDESON SEC VOC ED
...-2 ST. SW-COFFMAN BLD
...HESTER PUBLIC SCHOOLS
...HESTER MN 55901

...HARD T. HEGRE, EX DIR
...TH CENTRAL ECSU
... NORTH 2ND ST.
...PLES MN 56479

...N D. SHAW, EX DIR
... & W CENTRAL ECSU
...THWEST STATE UNIV
...SHALL MN 56258

ROBERT MCKAY, DIR VOC ED
ST. LOUIS PARK PUB SCH.
6425 WEST 33RD
ST LOUIS PARK MN 55426

DR JACK SJOSTROM
MANKATO PUBLIC SCHOOLS
51 PARK LANE
MANKATO MN 56001

DON PONSTEIN
NORTH BRANCH HS
NORTH BRANCH MN 55056

DEAN ROLFS
MPLS PUBLIC SCHOOLS
807 NE BROADWAY
MPLS MN 55413

LES SCHNEIDER
MANKATO AVTI
1920 LEED BLVD.
MANKATO MN 56001

G. THOSTENSON
SEC VOCATIONAL EDU
MOUND WESTONKA HIGH
MOUND MN 55364

BOB BOLLESON, DIR
MILLE LACS COOP VOC CNTR
BOX 62
BOCK MN 56313

GERALD NICHOLS VOC DIR
BLOOMINGTON SCHOOLS
10025 PENN AVENUE
BLOOMINGTON MN 55431

KEN LAHTI CITY ASST DIR
DULUTH PUBLIC SCHOOLS
LAKE AVE & 2ND ST
DULUTH MN 55802

AL FLETCHER
916 VOCATIONAL CENTER
3300 CENTURY AVENUE
WHITE BEAR LAKE MN 55110

TONY STAUBER, SEC VOC ED
DULUTH PUBLIC SCHOOLS
LAKE AVE & 2ND ST.
DULUTH MN 55802

BEN BOSCHE, CITY COORD
BUSINESS AND OFFICE
LAKE AVE & 2ND ST.
DULUTH MN 55802

JAY ETTINGER CONS
CAREER ED
300 COLBORNE ST
ST PAUL MN 55102

ROD TOOLEY
KELLOGG HIGH SCHOOL
15 E COUNTY RD B-2
ROSEVILLE MN 55117

DON LAUMB, DIRECTOR
RIVER VALLEY COOP CNTR
RUSHFORD PUBLIC SCHOOL
RUSHFORD MN 55971

ROBERT HALL
MINNESOTA VOC ASSOC
ST CLOUD ST. UNIVERSITY
ST CLOUD MN 56301

LOIS HAGEL
M.E.A.R.T.
2[illegible] CUTACROSS ROAD
GOLDEN VALLEY MN 55422

DAVID FREIBURG, VOC DIR
HIGHLAND COOP CENTER
237 WILLOW ST.
TYLER MN 56178

JOHN LOBBEN
SEC VOC DIR
1820 N. XENIUM LANE
MPLS MN 55441

DOUG DELANO
VOC. COORDINATOR
WINONA STATE UNIV.
WINONA MN 55987

MICHAEL CLAY
COUNSELOR
LITTLEFORK PUBLIC SCHOOL
LITTLEFORK MN 56652

RANDALL T. LAMBERT, DIR.
WEST CENTRAL ECSU
120 SE VINE-DRAWER E
FERGUS FALLS MN 56537

LESTER L MARTISKO, EX DI
SC ECSU, MANKATO ST. U.
BOX 9, 218 OLD MAIN
MANKATO MN 56001

KEN KOETZEL
VOCATIONAL DIRECTOR
SHERK COOP CENTER
WESTBROOK MN. 56183

ALLEN M KARLS
2333 UNIV AVE SE
MPLS MN
55414

ALLENDORF MARSHALL
220 GRAIN EX 400 S 4TH
MPLS MN
55415

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANCHOR BLOCK COMPANY

ALBERT,AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

AHOLA DEBRA
616 LINCOLN AVE APT 307
ST PAUL MN
55102

ROBERT COLLINS
VOCATIONAL EDUCATION
CHISAGO LAKES SR HIGH
LINDSTROM MN 55045

ALLERS JOHN
1501 W 80TH ST SUITE210
BLOOMINGTON MN
55431

MPLS ASSN RETARDED CITIZENS
3100 W LAKE ST
MPLS MN
55416

MPLS CITY ATTORNEY
325M CITY HALL
MPLS MN
55415

MT OLIVET ROLLING ACRES
R 1 BOX 576
EXCELSIOR MN
55331

MURPHY DIANA E
4200 IDS-LINDQUIST VENN
MPLS MN
55402

NASS GEO V HENN CO GEN HOSP
5TH AND PORTLAND AVE
MPLS MN
55415

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NC SUB MONTESSORI-S SADDLER
2487 HELEN COURT
NO ST PAUL MN
55109

NURSING HOME RES ADV CO.
111 E FRANKLIN S210
MPLS MN
55404

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OLOFSON ARTHUR M80 & MAINE
927 SOO LINE BLDG
MPLS MN
55402

PARKER SANDY
7480 CHANHASSEN ROAD
EXCELSIOR MN
55331

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PETERSEN DOUG ESIDE NEIGHBOR
HOOD SERV 1929 2ND STNE
MPLS MN
55418

PHAR MFGRS ASSN AP D PATTON
1155 15th ST NW
WASHINGTON DC DC
20005

PHILLIPS LEGISLATIVE SERVICE
459 RICE ST
ST PAUL MN
55103

PORTER DAVID
3032 27 AVE S
MPLS MN
55406

PORTER LYLE O

TRACY MN
56175

PLS STAR PRESS ROOM
TATE CAPITOL
T PAUL MN
5101

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

URPHY PATRICK SSR INC
OX 986 COURTHOUSE STA
RLINGTON VA
2216

MURPHY PATRICK DUFFY
1440 SUMMITT AVE
ST PAUL MN
55105

ATL CAR RENTAL ATT D MITZEL
501 GREEN VALLEY DR
PLS MN
5437

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

ELSON HOWARD I
INDSROM MN
5045

NEREN MADONNA
376 NEAL AVE S
AFTON MN
55001

ORTH CENTRAL ELEC ASSN
O BOX 202
ATTLE LAKE MN
6515

NURSING HOME ADMRS BD EXA
RM 340 717 DELAWARE SE
MPLS MN
55414

COUNTRY ELEVATOR ASSN
2 GRAIN EXCH BLDG
PLS MN
5415

NW REG. DEV. COMM
425 WOODLAND AVE
CROOKSTON MN
56716

'BRIEN J.DENNIS
00 1ST NATL.BANK BLDG
INNEAPOLIS MN
5402

O'CONNELL RAY
MN GAS CO 733 MARQ AVE
MPLS MN
55402

SON KATHLEEN
2 SEYMOUR AVE SE
PLS MN
5414

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

ATTISON ORVIS
X 645
LLMAR MN
201

PAYNE COL ALVIN
DEGRAFF MN
56233

TERSON MYRON D
UTE 2 BOX 99
CRED HEART MN
285

PFEIFER AND SHULTZ, INC
1433 UTICA AVE S
MPLS MN
55416

NETTI NICK M HALEY & ASS.
CENTRAL PARK S
YORK NY
19

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

AUTH CITY OF ST PAUL
MINNESOTA BLDG
PAUL MN
101

POSS DONALD G
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

RIOE WALT C REISS COAL CO
311 SO 8TH ST
HEBOYGAN WI
5081

PROCTOR&GAMBLE L THEOHAR
IVORYDALE TECH CENTER
CINCINNATI OH
45217

RADMAN RICHARD-LABOR TEMP
418 AUDITORIUM
ST PAUL MN
55102

AUENHORSTCORP-RONALD G KIRK
900 XERXES S S-2200
PLS MN
5431

REAGAN MICHAEL
% MINN LEARNING CTR
BRAINERD MN
56401

ED OWL STORES INC
15 E EXCELSIOR AVE
OPKINS MN
5343

ENNER R.H. ST PAUL AREA CC
00 OSBORN BLDG.
T PAUL MN
5102

RENQUIST ARTHUR NSP CO
414 NICOLLET MALL
MPLS MN
55401

IEKE DAVID
BOX 9311
PLS MN
440

ROE DAVID
175 AURORA
ST PAUL MN
55103

BERTS DAVID E
60 NW NATL BK BLDG
PAUL MN
101

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

PRAGUE CHARLOTTE B
EA HOSPITAL BOX 339
INDOM MN
101

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

HANE ETHEL
21 UNIVERSITYAVERM389
PAUL MN
104

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

MIDT WARREN WELLCOME MH5
DEN CITY
MN
334

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

ERMAN EARL JR
5 8TH AVE SE
CHESTER MN
01

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

POYZER POET
BOX 675
FERGUS FALLS MN
56357

PRAUSE JOS.C
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

POLSCHER RBT SPRINGSTED INC
813 OSBORN BLDG
ST PAUL MN
55102

RALPH BURKE ASSOCIATES
5200 W 73RD ST
MPLS MN
55435

RAMSEY CO MEDICAL SOC
908 AM NATL BK BLDG
ST PAUL MN
55101

REARDON MRS HELEN
1125 S E 6TH ST
WILLMAR MN
56201

REID DAVID H
6469 N GRAHAM RD
INDIANAPOLIS IN
46220

REGION NINE DEV. COMM.
709 N FRONT ST
MANKATO MN
56001

REINO O LAINE 3M COMPANY
3M CENTER
ST PAUL MN
55101

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROBERTS DR ALAN
BOX 297 MAYO U OF M
MPLS MN
55455

ROSS ROY J
CLK TREAS
LITCHFIELD MN
55355

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

SE MN REG DEV COMM
301 MARQ BK BLDG
ROCHESTER MN
55901

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEWS
50 S 9TH ST
MPLS MN
55402

SCHUTZ LINDA
RM 328 CAPITOL BLDG
ST PAUL MN
55155

SCHWARTAU NEAL METH HOSP
201 W CENTER ST
ROCHESTER MN
55901

[illegible] CTY BLDG OFFICIAL
[illegible] SO HOLMES ST
[illegible]AROPEE MN
[illegible]379

[illegible]NATE GOV OP COMM
[illegible] 303 STATE CAPITOL
[illegible] PAUL MN
[illegible]155

[illegible]VERMAN JUDITH
[illegible]45 W 28TH ST
[illegible] LOUIS PARK MN
[illegible]426

[illegible]ITH BOB III
[illegible]ONEER BLDG
[illegible] PAUL MN
[illegible]101

[illegible]DERBERG HAROLD J
[illegible]00 MIDWEST PLAZA BLDG
[illegible]LS MN
[illegible]402

[illegible]ANSFIELD ARLENE LAND OLKS
[illegible] BOX 116
[illegible]S MN
[illegible]40

[illegible]D AM LIFE & ANNUITY CO
[illegible]01 W 50TH ST
[illegible]LS MN
[illegible]10

[illegible]LLIVAN J KIRK
[illegible] BOX 200
[illegible]SE ID
[illegible]701

[illegible]ANSON DALE
[illegible] BOX 339
[illegible]REST LAKE MN
[illegible]025

[illegible]E VERN 3M CO
[illegible] CENTER 220/6W
[illegible] PAUL MN
[illegible]01

[illegible]SAVERS INC ATT R S VOLD
[illegible] HANSON COURT
[illegible] MN
[illegible]

[illegible] STOCK YARDS
[illegible] PRES
[illegible] ST PAUL MN
[illegible]

SELECTVISION INC [illegible] VALEN
1 DAG HAMMARSKJOL[illegible]PL
NEW YORK NY
10017

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SITE ENGINEER INC
12 OLD DEERFIELD RD
WELCH MN
55089

SMITH MICHAEL
75 DE KALB AVE
BROOKLYN NY
11201

SODERMAN ANTHONY
1414 FOSHAY TOWER
MPLS MN
55402

STATE & FEDERAL AGENCIES
1101-15TH NW
WASHINGTON DC
20005

STEELWORKERS CREDIT UNION
BOX 250
BABBITT MN
55706

SULLIVAN JEANETTE
CDIC SW STATE UNIV
MARSHALL MN
56258

SWANSON MORTIMER C
5824 FRANCE AVE S
EDINA MN
55410

TENNESSEN SEN ROBERT J
RM 309 STATE CAPITOL
ST PAUL MN
55165

TOWNSHIP OF WHITE BEAR
1281 HAMMOND RD
WHITE BEAR LK MN
55110

UTLEY JOHN
4610 IDS CENTER
MPLS MN
55402

AN DRAKE STEPEN R
BOX 2154
RIPOLI LIBYA N
AB

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

ILLAGE OF WOODBURY
100 RADIO DRIVE
OODBURY MN
5042

VOSS REV GORDON O
11120 NE 7TH ST
BLAINE MN
55434

LTERS THOMAS MN MFG HOUSE
30 W 77TH ST STE 227
LS MN
5435

WALZ SAM CO ADMINISTRATIO
ANOKA CTY COURTHOUSE
ANOKA MN
55303

ASHINGTON COUNTY
900 61ST ST NO
ILLWATER MN
5082

WATERS, DONNA M.
110506 WINDMILL COURT
CHASKA MN
55318

HITLOCK A G
CON LAB OSBORN BLDG
T PAUL MN
5102

WHITLOCK MARSHALL
RM 433 STATE OFFICE BLD
ST PAUL MN
55155

.MITCHEL COLLEGE LAW LIB.
00 SUMMIT AVE.
.PAUL MN
105

WILEY ENTERPRISES
101 5TH AVE SE
OSSEO MN
55369

S FEEDER PIG MARKET CO-OP
ANCIS CREEK WI

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

ANT CLINTON W ATTY
KIN MN
5431

CHARY LOUIS L
09 BEARD AVE
OOMINGTON MN
5431

ZIMMERMAN & OFFERMAN
CAMBRIDGE STATE HOSP
CAMBRIDGE MN
55008

VANDERVOORT T J MET WASTE
350 METRO SQUARE BLDG
ST PAUL MN
55101

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VILTALA, W.C. HONEYWELL
HONEYWELL PLAZA
MPLS MN
55408

VOS LEROY
2137 BURNS AVE
ST PAUL MN
55119

WAMPLER LINUS DIR USW OF AM
609 PROVIDENCE BLDG
DULUTH MN

WANQUIST ALLEN
RM 252 FEDERAL BLDG
ST PAUL MN
55101

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WEST CENTRAL REG. DEV.
ADM BLDG,COMMUNITY COLL
FERGUS FALLS MN
56537

WHITING RALPH
7316 BAILEY ROAD
NEWPORT MN
55055

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WILLETTE MARY
2711 W 47TH STREET
MPLS MN
55410

WILSON R GARY PPG INDUSTR
1 GATEWAY CENTER
PITTSBURGH PA
15222

WOZNIAK C J
401 FIRST FED BLDG
ST PAUL MN
55101

WRIGHT CO COMMUNITY SERVICES
7N.W 1ST ST
BUFFALO MN
55313

CITY OF ST LOUIS PA
5035 MINNETONKA BLVD
ST LOUIS PARK MN
55416

CITY OF ST PAUL
445 CITY HALL
ST PAUL MN
55102

CITY OF SHAKOPEE
129 E 1ST AVE
SHAKOPEE MN
55379

CITY OF SHOREVIEW
4065 NO VICTORIA ST
SHOREVIEW MN
55112

CITY OF THIEF RIVER FALLS
BOX 528
THIEF RIVERFA MN
56701

CITY OF WARREN
CITY HALL
WARREN MN
56762

CITY OF WINDOM
444 9TH STREET
WINDOM MN
56101

CITY OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
55041

COLEMAN NICHOLAS
208 STATE CAPITOL
ST PAUL MN
55155

COMMUNITY DESIGN CENTER
118 E 26TH ST
MPLS MN
55404

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

COUNTY OF OLMSTED
1421 SE 3RD AVE
ROCHESTER MN

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

DAHLKE LOIS M
118 S EAGLE ST
BELLE PLAINE MN
56011

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DAWSON JEAN MN GOV'T REPORT
ROOM B12 CAPITOL
ST PAUL MN
55155

DICKINSEN MRS JOANNE
BOX 1065
MARSHALL MN
56258

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DOUGLAS BILL ET AL
2212 AM. NATL BK BLDG
ST PAUL MN
55102

DOW CHEMICAL
47 BLDG
MIDLAND MI
48640

DUGAN KEN ST PAUL PLANNING
421 WABASHA ST
ST PAUL MN
55102

ITY OF ST PETER
X 270
T PETER MN
6082

ITY OF SOUTH ST PAUL
25 3RD AVE NO
ST PAUL MN
5075

ITY OF WAYZATA
0 RICE STREET
AYZATA MN
5391

LARKSON J.B.
350 I.D.S. CENTER
INNEAPOLIS MN
5402

OLHAPP TED
294 VALLEY VIEW ROAD
HASKA MN
5318

ONSUMER SERVICES DEPT COMM
TH FLR METRO SQ BLDG
PAUL MN
5101

OW WING CO PLANNING & ADV
OURT HOUSE
AINERD MN
401

ILEY THOMAS ECONOMICS LAB
70 WABASHA ST
PAUL MN
5102

AYTON CHAS SIERRA CLUB
0 MIDLAND BANK BLDG
PLS MN
5401

SPATCH PIONEER PRESS
ESS RM STATE CAPITOL
PAUL MN
101

CLIVER PLUMBERS LOC 15
SO 10TH ST
S MN
4

ENTRAL REG. DEV. COMM
MPHOUSE 18 N VINE ST
MN
51

CITY OF SAVAGE
12305 QUENTIN AVE SO
SAVAGE
55378

CITY OF SPRING LAKE PARK
1301 81ST AVE NE
SPRING LAKEPK MN
55432

CITY OF WHITE BEAR LAKE
250 MILLER AVE
WHITE BEAR LK MN
55110

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN
55108

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COUNTY ATTYS COUNCIL
40 NO MILTON ST STE 106
ST PAUL MN
55104

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DANKERS,KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DEVELOP DISABILITIES PROG
STATE PLAN 101 CAP SQ
ST PAUL MN
55155

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DUPONT MIKE
5720 EXCELSIOR BLVD
MPLS MN
55416

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

ECKLUND WM BELLHAGEN CARLSON
W 1080 1ST NATL BANK
ST PAUL MN
55101

EDEVOLD RUTH
PO BOX 246
BEMIDJI MN
56601

ELDRED K W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

ENNIS A F BOISE CASCADE
PO BOX 715
INTL FALLS MN
56649

ENV SERV-GEN RESOURCE CORP
6340 INDUSTRIAL DR
HOPKINS MN
55343

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FARRELL FRANK BUR NOR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

FILTER LUREN
BOX 36
BRITT MN
55701

FINNEGAN J.R.
55 E. 4TH
ST. PAUL MN
55101

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FLADLAND CLINT MN L&P BUR
795 RAYMOND AVE
ST PAUL MN
55114

FORSCHLER RICHARD
1500 NW FIN CENTER
MPLS MN
55431

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

FREDLUND MRS PHYLLIS
RR 4 BOX 37
CANBY MN
56220

FREDRIKSON BYRON ET AL
471H FLR IDS CENTER M
PLS MN
55402

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GED A HUKAEL & CO LAW DEPT
PO BOX 308
AUSTIN MN
55912

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

[illegible] DANIEL
794 HAZEL
[illegible] BEAR LK MN
[illegible]110

[illegible]ERICK RICHARD A
[illegible]08 IDS CENTER
[illegible]LS MN
[illegible]402

[illegible]OMAN ROGER TENNANT CO
[illegible]1 N LILAC DR
[illegible]LS MN
[illegible]441

[illegible]HICS COMM
[illegible] 410 STATE OFF BLDG
[illegible] PAUL MN
[illegible]155

[illegible]BISH MIKE INTL UN OP ENG
[illegible]07 1ST ST W
[illegible]RGINIA MN
[illegible]792

[illegible]RSETH PAUL FOOD STAMPS PRO
[illegible]FARE DEPT 690 N ROBT
[illegible] PAUL MN

[illegible]TZGERALD DR BOB
[illegible]07 LYNDALE AVE SO
[illegible]LS MN
[illegible]408

[illegible]RBES GORDON MINN RRS ASSN
[illegible]3 HANOVER 480 CEDAR
[illegible] PAUL MN
[illegible]101

[illegible]ANKLIN ROBERT B MPLS TRIB
[illegible]6 PORTLAND
[illegible]LS MN
[illegible]415

[illegible]ESEN MILLER A
[illegible]NK BD 624 15TH ST S
[illegible]IGINIA MN
[illegible]792

[illegible]OWER HOA - R A JOHNSON
[illegible] WASHINGTON AVE N
[illegible]S MN
[illegible]01

[illegible]SEN MICHAEL
[illegible]500 SC BLDG U OF M
[illegible] MN
[illegible]55

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

ENDERSON WILLIAM
3644 NICOLLET AVE
MINNEAPOLIS MN
55409

ERICKSON BURDETTE ABI CON
BOX 942
VIRGINIA MN
55792

EVANS CHAS.L. PRENTICE-H
ENGELWOOD CLIFFS
NEW JERSEY

FAEGRE & BENSON ATTN LIBR
1300 NW BANK BLDG
MPLS MN
55402

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FITZPATRICK LEO
8138 HENSLOWE AVE S
COTTAGE GROVE MN
55016

FORSBERG AGR SERV
518 SUMMIT AVE
NEW ULM MN
56073

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

FRISON FRANK NECA
RM 305 200 SO ROBERT
ST PAUL MN
55107

GEBERT K L
220 GRAIN EXCH
MPLS MN
55415

GLEN. HILLS HOSP.R.VAN HA
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

Exh. # 5
1-20-79
MKW

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE STEVE MIHALCHICK
HEARING EXAMINER
OFFICE OF HEARING EXAMINER

IN THE MATTER OF: The proposed adoption of rules of the Board of Teaching governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota

AFFIDAVIT

Nancy A. Dippel, being first duly sworn on oath deposes and says:

1. That she is the secretary for the Board of Teaching of the State of Minnesota.

2. That on the 19th day of December, 1978, she went to the Office of the Secretary of State for the State of Minnesota and requested a current list of all representatives of associations or other interested groups or persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to Minn. Stat. § 15.0412 (supp. 1977).

3. That on the 19th day of December, in response to the above request, the Secretary of State provided her with a list of 584 labels and two pages of names and addresses which constitutes the complete list of persons, associations, and other interested groups who as of 9:15 o'clock a.m. on the 19th day of December, 1978, had requested that their names be placed on file for the purposes set out in paragraph 2 above.

FURTHER AFFIANT SAYETH NOT.

Nancy A. Dippel

Nancy A. Dippel

Subscribed and sworn to before me

this 20 day of December, 1978.

Luana Vadnais
Notary Public

LUANA VADNAIS
NOTARY PUBLIC-MINNESOTA
RAMSEY COUNTY
My Comm. Expires June 16, 1984

Exh. # 7
1-20-79
MKW

STATE OF MINNESOTA

COUNTY OF RAMSEY

IN THE MATTER OF: The proposed adoption of rules of the Board of Teaching governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota

AFFIDAVIT OF MAILING

Nancy A. Dippel, being first duly sworn, deposes and says:

That on the 21st day of December, 1978, at the City of St. Paul, County of Ramsey, State of Minnesota, she served the attached Notice of Hearing by depositing in the United States Mail at said City of St. Paul, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached Certificate of the Secretary of State.

Nancy A. Dippel
NANCY A. DIPPEL

Subscribed and sworn to before me
this 21 day of December, 1978.

Luana Vadnais
Notary Public

LUANA VADNAIS
NOTARY PUBLIC-MINNESOTA
RAMSEY COUNTY
My Comm. Expires June 16, 1984

Exh. # 8
1-20-79
mkw

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE STEVE MIHALCHICK
HEARING EXAMINER
OFFICE OF HEARING EXAMINERS

IN THE MATTER OF: The proposed adoption of rules of the Board of Teaching governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota

STATEMENT OF EVIDENCE

In addition to the STATEMENT OF NEED which is available for inspection or purchase at the Office of Hearing Examiners, 1745 University Avenue, St. Paul, Minnesota 55104 and in support thereof, the Board of Teaching will introduce the following evidence and will call the following expert witness to testify:

5 MCAR § 3.002 RULE GOVERNING PROCEDURES FOR THE ISSUANCE OF LIFE LICENSES:

Edward Rapp, Member
Minnesota Board of Teaching
Coon Rapids, Minnesota

Edward Rapp will establish that the proposed rule governing procedures for the issuance of life licenses is justified and reasonable.

In addition, he will contend that teachers in Minnesota, prior to July 1, 1969, applied for and received initial licenses which were the first steps of a licensure system that included a life license after five years of successful teaching. In effect, an agreement was signed with the State of Minnesota and that agreement should be fulfilled.

Further, those teachers in that licensure system were not notified by the State of Minnesota that a different arrangement was being proposed to the Minnesota Legislature so that they could take action to protect their interests.

No due process procedures were built into the law to provide protection for those teachers who believed they were working toward a life license.

Mr. Rapp will testify contending that injustices still exist from the time that life licenses ceased to be issued. These injustices will be corrected with the adoption of 5 MCAR § 3.002 Procedures for the Issuance of Life Licenses.

Mr. Rapp will further testify contending that at the time life licenses ceased to be issued, active teachers were denied a right available and expected upon entry into the teaching profession.

5 MCAR § 3.142 RULE GOVERNING THE LICENSURE OF TEACHERS PREPARED IN STATES OTHER THAN MINNESOTA:

Edward Rapp, Member
Minnesota Board of Teaching
Coon Rapids, Minnesota

Edward Rapp will testify providing justification for the proposed rule governing the licensure of teachers prepared in states other than Minnesota.

He will testify that M.S. 125.52 authorizes the State of Minnesota to contract with one or more states for reciprocity in teacher licensure.

He will further testify that M.S. 125.06 authorizes the Minnesota Board of Teaching to issue licenses to teachers prepared in states other than Minnesota provided that such teacher preparation is essentially equivalent to that provided within the State of Minnesota.

Edward Rapp will establish that the rule is justified and reasonable and that there is an existing void in criteria for the issuance of licenses to teachers prepared in states other than the State of Minnesota, and that criteria must be established by rule to provide a basis for determining essential equivalence for the issuance of such licenses.

The Board of Teaching will cite the following statutes:

1. M.S. 179.63
2. M.S. 125.185 Subd. 4
3. M.S. 125.52
4. M.S. 125.07

Kenneth L. Peatross

Kenneth L. Peatross, Executive Secretary
MINNESOTA BOARD OF TEACHING

Date: 12/22/78

Exh. #4
1-20-79
MKW

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE STEVE MIHALCHICK
HEARING EXAMINER
OFFICE OF HEARING EXAMINERS

IN THE MATTER OF: The proposed adoption of rules of the Board of Teaching governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN that a public hearing will be held pursuant to Minnesota Statutes, Section 15.0412 subd. 4 (Supp. 1977), in the above entitled matter in the Veterans Service Building, Conference Room D, 20 West 12th Street and Columbus Avenue, St. Paul, Minnesota 55155, on Saturday, January 20, 1979, commencing at 9:00 a.m. and continuing until all representatives of associations or other interested persons have had an opportunity to be heard concerning the adoption of the proposed rules captioned above by submitting either oral or written data, statements, or arguments. Written material may be submitted without appearing at the hearing and may be submitted and recorded in the hearing record for five (5) days after the public hearing ends or for a longer period not to exceed twenty (20) calendar days if ordered by the hearing examiner.

The Board proposes to adopt rules governing procedures for Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota. The authority of the Board to promulgate the proposed rules is found in Minnesota Statutes, Sections 125.05 subd. 1 and 125.185 subd. 4. A copy of the proposed rules is attached hereto.

NOTICE IS HEREBY GIVEN that twenty-five (25) days prior to the hearing, a statement of need and reasonableness will be available for review at the Office of the Board of Teaching and at the Office of Hearing Examiners. This statement of need and reasonableness will include a summary of all of the evidence which will be presented by the Board of Teaching at the hearing justifying both

the need for and the reasonableness of the proposed rules. Copies of the statement of need and reasonableness may be obtained from the Office of Hearing Examiners at a minimal charge at this address: Office of Hearing Examiners, 1745 University Avenue, St. Paul, Minnesota 55104.

Minnesota Statutes, Section 10A.01, subd.11 (1976), defines a lobbyist as any individual:

(a) Engaged for pay or other consideration, or authorized by another individual or association to spend money, who spends more than five hours in any month or more than $250, not including travel expenses and membership dues, in any year, for the purpose of attempting to influence legislative or administrative action by communicating or urging others to communicate with public officials; or

(b) Who spends more than $250, not including traveling expenses and membership dues, in any year for the purpose of attempting to influence legislative or administrative action by communicating or urging others to communicate with public officials.

Lobbyist does not include any:

(a) Public official or employee of the state or any of its political subdivisions or public bodies acting in his official capacity;

(b) Party or his representative appearing in a proceeding before a state board, commission or agency of the executive branch unless the board, commission or agency is taking administrative action;

(c) Individual in the course of selling goods or services to be paid for by public funds;

(d) News media or their employees or agents acting in the ordinary course of business of publishing or broadcasting news items, editorials or other comments or paid advertisements which directly or indirectly urge official action;

(e) Paid expert witness whose testimony is requested either by the body before which he is appearing or one of the parties to a proceeding, but only to the

extent of preparing or delivering testimony; or

(f) Stockholder of a family farm corporation as defined in Section 500.24, subd. 1, who does not spend over $250, excluding travel expenses, in any year in communicating with public officials.

Pursuant to Minnesota Statutes, Section 10A.03 (1976), lobbyists must register with the State Ethical Practices Board as a lobbyist within five (5) days of the commencement of such activities by the individual.

Any questions regarding lobbying should be directed to the State Ethical Practices Board, Room 41, State Office Building, Wabasha Street, St. Paul, Minnesota 55155.

Public comment will be accepted after presentation of each of the proposed rules.

Copies of the proposed rules are now available and may be obtained by writing to:

Minnesota Board of Teaching
608 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Additional copies of the proposed rules will be available at the door on the date of the hearing.

NOTICE IS HEREBY GIVEN that any person may request notification of the date on which the report of the hearing examiner will be available, after which date the Board of Teaching may not take any final action on the rules for a period of five (5) working days. Any person may request notification of the date on which the hearing record has been submitted or resubmitted to the Attorney General by the Board of Teaching. If you desire to be notified, you may so indicate at the hearing. After the hearing, you may request notification by sending a written request to the hearing examiner in the case of the report of the hearing examiner,

or to the Board of Teaching in the case of the Board of Teaching submission or resubmission to the Attorney General.

STATE OF MINNESOTA
BOARD OF TEACHING

BY Kenneth L Peatross

Kenneth L. Peatross, Executive Secretary
MINNESOTA BOARD OF TEACHING

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE HOWARD L. KAIBEL, JR.
HEARING EXAMINER
OFFICE OF HEARING EXAMINERS

IN THE MATTER OF: The proposed adoption of a rule of the Board of Teaching governing Teachers Prepared in States Other than Minnesota

ORDER ADOPTING RULE

The above-entitled matter came on for hearing before the Board of Teaching of the State of Minnesota on the 20th day of January, 1979, at 9:00 a.m. in the Veterans Service Building, St. Paul, Minnesota, after proper notice required by M.S. 1976, Section 15.0412 was served upon all persons, associations, and other interested groups registered with the Secretary of State for that purpose.

After affording interested persons an opportunity to present written and oral data, statements, and arguments, having heard all of the testimony, having considered all of the evidence adduced and upon the records, files and proceedings herein, and applicable statutory standards or criteria, and having confirmed the need for the above captioned rule and the reasonableness thereof.

NOW THEREFORE, IT IS ORDERED that 5 MCAR § 3.142 Teachers Prepared in States Other than Minnesota is adopted this 16th day of March, 1979, pursuant to the authority vested in the Board of Teaching.

STATE OF MINNESOTA
BOARD OF TEACHING

Joseph J. Moren

Joseph J. Moren, Chairman

Jo Malmsten

Jo Malmsten, Vice Chairman

STATEMENT OF COMPLIANCE WITH

MANUAL OF RULE MAKING PROCEDURES

I, Special Assistant Attorney General Donald J. Mueting, do hereby declare that I have examined the proposed rule and all related documents and that, based on them and my personal familiarity with applicable procedures, the Manual of Rule Making Procedures has been followed. Any exceptions are noted below.

Donald J. Mueting

Donald J. Mueting
SPECIAL ASSISTANT ATTORNEY GENERAL

Dated: Aug. 22, 1979

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS
ROOM 300 – 1745 UNIVERSITY AVENUE
ST. PAUL, MINNESOTA 55104
(612) 296-6910

August 27, 1979

Mr. Kenneth L. Peatross
Executive Secretary
Minnesota Board of Teaching
608 Capitol Square Building
St. Paul, Minnesota 55101

Re: BT-79-002-HK

Dear Mr. Peatross:

Enclosed please find the documents which you submitted to us for review on the issue of substantial change together with the Report of the Chief Hearing Examiner, pursuant to Minn. Stat. § 15.052, subd. 4.

Yours very truly,

Duane R. Harves

DUANE R. HARVES
Chief Hearing Examiner

sh
Encs.

BT-79-002-HK

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE MINNESOTA BOARD OF TEACHING

IN THE MATTER OF THE PROPOSED ADOPTION OF RULES OF THE BOARD OF TEACHING GOVERNING PROCEDURES FOR THE ISSUANCE OF LIFE LICENSES, TEACHERS PREPARED IN STATES OTHER THAN MINNESOTA.

REPORT OF THE CHIEF HEARING EXAMINER

WHEREAS, a hearing was held on January 20, 1979, before Howard L. Kaibel, Jr., a Hearing Examiner of the State Office of Hearing Examiners, on the above-entitled matter in compliance with Minn. Stat. § 15.0412, subd. 4; and

WHEREAS, the Report of Hearing Examiner made pursuant to Minn. Stat. § 15.052, subd. 3, was issued to the Board of Teaching on February 26, 1979; and

WHEREAS, the Board of Teaching has now determined to adopt rules pursuant to Minn. Stat. § 15.0412, subd. 4; and

WHEREAS, the Board of Teaching has submitted said rules to the Chief Hearing Examiner for review pursuant to Minn. Stat. § 15.052, subd. 4, and 9 MCAR § 2.110; and

WHEREAS, the Chief Hearing Examiner finds that the final proposed rules are not substantially different from those proposed at the public hearing and the the Board of Teaching has met all requirements of Minn. Stat. § 15.0412, subd. 4.

NOW, THEREFORE, upon receipt of this Report, the Board of Teaching has the responsibility of submitting the complete hearing record and the rules as adopted by the Board to the Attorney General, notifying all persons who requested to be informed that the hearing record has been submitted to the Attorney General, and publishing in the State Register, all pursuant to Minn. Stat. § 15.0412, subd. 4.

Dated this 27th day of August, 1979.

Duane R. Harves

DUANE R. HARVES
Chief Hearing Examiner

Exh. #3
1-20-79
MKW

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE STEVE MIHALCHICK
HEARING EXAMINER
OFFICE OF HEARING EXAMINERS

IN THE MATTER OF: The proposed adoption of rules of the Board of Teaching governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota

ORDER FOR HEARING

The Board of Teaching deems it necessary to consider adoption of the proposed rules captioned above pursuant to the authority vested in the Board by Minnesota Statutes, Sections 125.05 subd. 1 and 125.185 subd. 4.

NOW, THEREFORE, IT IS ORDERED on this 17th day of November, 1978, that a public hearing on the proposed rules captioned above be held in the Veterans Service Building, Conference Room D, 20 West 12th Street and Columbus Avenue, St. Paul, Minnesota 55155, on Saturday, January 20, 1979, commencing at 9:00 a.m. and continuing until all representatives of associations and other interested groups or persons have had an opportunity to be heard.

IT IS FURTHER ORDERED that notice of said hearing be given to all representatives of associations or other interested groups or persons who have registered their names with the Secretary of State for that purpose.

IT IS FURTHER ORDERED that the notice of said hearing be published in the State Register.

STATE OF MINNESOTA
BOARD OF TEACHING

BY Kenneth L Peatross

Kenneth L. Peatross, Executive Secretary
MINNESOTA BOARD OF TEACHING

Exh. # 2
1-20-79
MKW

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE STEVE MIHALCHICK
HEARING EXAMINER
OFFICE OF HEARING EXAMINERS

IN THE MATTER OF: The proposed adoption of rules of the Board of Teaching governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota

The Board of Teaching deems it necessary to consider adoption of the proposed rules captioned above pursuant to the authority vested in the Board by Minnesota Statutes, Sections 125.05 subd. 1 and 125.185 subd. 4.

The public hearing on the proposed rules captioned above will be held on Saturday, January 20, 1979, commencing at 9:00 a.m..

It is estimated that the public hearing will continue until 3:00 p.m. on the date cited above and that approximately 100 persons will be in attendance.

STATE OF MINNESOTA
BOARD OF TEACHING

BY Kenneth L. Peatross

Kenneth L. Peatross, Executive Secretary
MINNESOTA BOARD OF TEACHING

Exh. # 1
1-20-79
MKW

CERTIFICATE OF BOARD'S AUTHORIZING RESOLUTION

I, KATHRYN C. RAYBURN, do hereby certify that I am the Chairman of the Minnesota Board of Teaching, a Board duly authorized under the laws of the State of Minnesota, and that the following is a true, complete, and correct copy of a resolution adopted at a meeting of the Board duly and properly called and held on the 18th day of October, 1978, that a quorum was present at said meeting, that a majority of those present voted for the resolution, and that said resolution is set forth in the minutes of said meeting and has not been rescinded or modified:

RESOLVED that Kenneth L. Peatross, Executive Secretary of the Minnesota Board of Teaching, be and hereby is granted the authority and directed to call a hearing for the purpose of promulgating rules of the Board, including the enactment, amendment, or repeal of rules relating to: Procedures for Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota, as well as perform any and all acts incident thereto, including but without being limited thereto, signing an order for hearing and notice of hearing, as well as securing a hearing examiner for all hearings.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 18th day of October, 1978.

Kathryn Rayburn
Chairman, Minnesota Board of Teaching

Joseph J. Moen
Attest by one other officer

Exh. # 9
1-20-79
MKW

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE STEVE MIHALCHICK
HEARING EXAMINER
OFFICE OF HEARING EXAMINERS

IN THE MATTER OF: The proposed adoption of rules of the Board of Teaching governing Procedures for the Issuance of Life Licenses, Teachers Prepared in States Other than Minnesota

STATEMENT OF NEED

The above captioned rules are new rules of the Board of Teaching.

THE BOARD OF TEACHING PROPOSES TO ADOPT PROPOSED 5 MCAR § 3.002 RULE GOVERNING PROCEDURES FOR THE ISSUANCE OF LIFE LICENSES:

Because M.S. 125.185, Subd. 4, mandates that the Minnesota Board of Teaching "grant life licenses to those who qualify according to requirements established by the board of teaching," and

Because the Minnesota State Legislature in 1969 removed the opportunity for life licensure for all teachers not in possession of life licensure except those who qualified with at least five years of teaching experience in July 1969, thus depriving teachers of a right available and expected at the time of entry into the profession, and

Because the date of July, 1969, appears to be arbitrary as applied to practicing teachers, and

Because approximately eight to ten thousand teachers in the State of Minnesota have been so affected by the loss of potential life licensure, and

Because more recent legislative trends have indicated a movement toward a "continuing education" philosophy for all practicing professionals, thus allowing the Board of Teaching to hereby grant life licensure, as required by statute, to those limited number of senior teachers who hold a justifiable claim to such status, while retaining a system of professional growth for all teachers entering the profession after July 1969.

The proposed rule meets this Statement of Need in the following manner:

It limits eligibility for life licensure to teachers actually employed as a teacher in the State of Minnesota in the school year immediately preceding July 1, 1969.

It requires the granting of life licensure to eligible teachers upon application to the Board of Teaching.

It expires in July of 1980, thus attesting to the temporary and limited intent of the rule.

THE BOARD OF TEACHING PROPOSES TO ADOPT PROPOSED 5 MCAR § 3.142 RULE GOVERNING TEACHERS PREPARED IN STATES OTHER THAN MINNESOTA:

Because M.S. 125.52, Interstate Agreement on Qualifications of Educational Personnel, authorizes Minnesota to contract with one or more states for reciprocity in licensure, and

Because M.S. 125.06 authorizes the Board of Teaching to issue licenses to teachers trained in other states providing that the preparation is "essentially equivalent" to that provided in Minnesota, and

Because criteria must be established in order to define education programs that are essentially equivalent to those in Minnesota, and

Because a system of verification is necessary to insure equivalence, and

Because reciprocity in licensure will provide an increased measure of mobility to persons prepared as teachers in the State of Minnesota at a time when declining enrollments have depressed the job market in this state, and

Because a broadened geographical base of training will allow prospective employers, both in Minnesota and in other states, to select from a wider and more diverse pool of professional employees, and

Because the high standards of teacher training in Minnesota require that this state retain autonomy in the matter of determining which states and/or educational institutions meet such standards.

The proposed rule meets this Statement of Need in the following manner:

Section A.1. authorizes the granting of licenses to teachers prepared in states which have signed contracts with Minnesota, thus meeting the requirements of M.S. 125.52 and allowing the establishment and continued verification of criteria for teacher education programs that may meet the test of "essential equivalence" to those found in Minnesota.

Section A.2. establishes the criteria for granting licenses to teachers prepared in states not contracting with Minnesota for reciprocity in licensing, thus allowing a determination of "equivalence" of teacher preparation institutions and programs.

Kenneth L. Peatross, Executive Secretary
MINNESOTA BOARD OF TEACHING

Date: 12/22/78