

Minnesota Attorney General: Administrative Rules Proceedings

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August 20, 2018

BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS

OF THE STATE OF MINNESOTA

IN THE MATTER OF THE PROPOSED ADOPTION OF A RULE OF THE STATE BOARD OF EDUCATION GOVERNING LICENSURE REQUIREMENTS FOR HEAD VARSITY COACHES OF INTERSCHOLASTIC SPORTS IN SENIOR HIGH SCHOOLS. 5 MCAR § 1.0533.	H. E. DOCKET NO. EDU-81-002-PE

Conference Room D, Fifth Floor
Veterans Service Building
St. Paul, Minnesota
Thursday, April 2, 1981

Met, pursuant to Notice, at 9:00 a.m.

BEFORE:

Peter Erickson, Hearings Examiner

AGENCY PANEL:

Dr. Gregory Waddick, Assistant Commissioner, Minnesota Department of Education

Dr. George Droubie, Manager of Personnel Licensing and Placement Section for the Minnesota Department of Education.

Sheila Fishman, Special Assistant Attorney General representing the State Board of Education and Department of Education.

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EXAM. ERICKSON: This hearing in the Matter of Proposed Adoption of a Rule of the State Board of Education Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools, that is quoted 5 MCAR § 1.0533, is called to order at 9:15 a.m. on Thursday, April 2nd, 1981 in Conference Room D of the Veterans Service Building, St. Paul, Minnesota.

My name is Peter Erickson. I am an independent Hearing Examiner appointed by the Chief Hearing Examiner to hear this matter. This hearing is part of the process by which agency rules must be adopted under the Minnesota Administrative Procedure Act. During the hearing, the agency must first document its statutory authority to adopt the proposed rules, or to repeal or amend an existing rule; second, demonstrate that it has fulfilled all relevant, substantive and procedural requirements of law or rule, and third, demonstrate the need for and reasonableness of each portion of the proposed rule with an affirmative presentation of facts. There will be an opportunity for the public to ask questions and to make oral

statements following the agency presentation. As noted in the Procedures Section on this sheet there will also be an opportunity to submit written comments or statements.

The order of procedure to be followed at the hearing is as follows: First, this explanation. Second, the agency presentation. Third, questions and statements by the public.

This hearing is being conducted by a Hearing Examiner who is with the State Office of Administrative Hearings. This office and the Hearing Examiner are independent of the agency proposing the rules. The hearing will be conducted in a manner which is fair to all persons involved.

Following the hearing, the Hearing Examiner will complete a report dealing with the issues of statutory authority, compliance with substantive and procedural requirements, substantial change, and the need for and reasonableness of each section of the rule. The report may also summarize comments made and may suggest certain changes to the proposed rule.

After receiving the Examiner's report, the Chief Hearing Examiner's report if there is an adverse finding, and the entire hearing record, the agency will decide whether to adopt, withdraw or modify

the proposed rule based upon a consideration of the comments made during this rule hearing proceeding. However, the agency must wait at least five days after issuance of the Examiner's report, and the Chief Hearing Examiner's report if applicable, before taking any action. The Examiner's report will be available to members of the public at a nominal charge. If you wish to be notified when the report is available, please write your name and address on one of the envelopes provided at the registration desk.

The agency must submit the rule as proposed to the Chief Hearing Examiner if it makes changes other than those recommended by the Hearing Examiner, and to the Attorney General, who reviews it for form and legality. Persons who challenge the form and/or legality of the rule may direct their comments to the Attorney General. If you wish to be notified when the rule is sent to the Attorney General, please check the appropriate box on the registration sheet.

Everyone attending the hearing is requested to sign the hearing register to ensure an accurate record of the number of people attending the hearing. The hearing register is located on the registration table in the back of this room.

If you wish to make a statement, please

place a check mark in the speaker's box on the hearing register. Everyone who wants to speak will have an opportunity to do so. When you go to the designated speaker's area, state and spell your name and the interest or group, if any, you represent. Any speaker may be questioned by the agency panel. Speakers may agree to be questioned by other members of the public.

The hearing is being recorded by Nancy Duehn, a court reporter, who is sitting right in front of me. She will make a transcript of this proceeding which will be available for inspection sometime next week. You must remember that all statements must be verbalized. A nod cannot be recorded. It is important that you speak loudly, clearly and slowly. All technical terms and proper names must be spelled out the first time they are mentioned. Only one person may speak at a time.

Anyone who desires to submit written comments may do so at this hearing or within five working days of the close of the hearing. The Hearing Examiner may, during the hearing, extend the period for receipt of comments up to 20 calendar days. The record closes on the last day of the period for submission of written comments. Such material should be submitted to the Hearing Examiner at -- that will be to Peter Erickson,

Office of Administrative Hearings, Room 300, 1745 University Avenue, St. Paul, Minnesota 55104. The materials must be received before 4:30 p.m. on the date on which the record closes in order to be considered.

An individual who falls within the definition of lobbyist contained in Minn. Stat. Chapter 10A shall register with the Ethical Practices Board within five days of becoming a lobbyist. Lobbyist registration forms may be obtained by writing the Ethical Practices Board, 41 State Office Building, St. Paul, Minnesota 55155, or telephoning area code 612, 296-5615. Please contact the Board if you have any questions concerning lobbyist registration and reporting requirements.

Will the Department panel please note their appearance for the record. Please state and spell your names and give your addresses. Dr. Waddick.

DR. WADDICK: Gregory Waddick, W-a-d-d-i-c-k, Assistant Commissioner, Minnesota Department of Education, 550 Cedar Street, St. Paul.

EXAM. ERICKSON: Dr. Droubie.

DR. DROUBIE: George Droubie, D-r-o-u-b-i-e, Manager of Personnel Licensing and Placement Section for the Department of Education, Capital Square Building, St. Paul.

EXAM. ERICKSON: Ms. Fishman.

MS. FISHMAN: I am Sheila Fishman, F-i-s-h-m-a-n. I am a Special Assistant Attorney General and I am here today representing the State Board of Education, Department of Education. My office address is 1100 Bremer Tower in St. Paul.

EXAM. ERICKSON: Ms. Fishman, I believe you have marked some exhibits that you would like to offer at this time?

MS. FISHMAN: Yes, I would.

EXAM. ERICKSON: Please identify those.

MS. FISHMAN: I would like to identify and offer the following exhibits. I have marked them as EDU, Education, Exhibits. The first one, Number 1, is the Notice of Intent to Solicit Outside Opinion. It is a Copy of the page from the State Register of Monday, August 11th, 1980. Marked as EDU Exhibit 2 is the responses that were received as a result of the Notice of Intent to Solicit. Marked as EDU Exhibit 3 is a copy of the State Register of February 23rd, 1981, which contains the Notice of Hearing and the rule. Marked as EDU Exhibit 4 is a copy of the Notice of Hearing as mailed, and marked as EDU Exhibit 5 is a copy of the rule as proposed. Marked as EDU Exhibit 6 is the Order for Hearing in this particular matter

signed by Howard Casmey, Secretary of the State Board of Education. Marked as EDU Exhibit 7 is a Certificate of the Board's Authorizing Resolution. Marked as EDU Exhibit 8 is a copy of the Statement of Need and Reasonableness. Attached to the last page of the Statement of Need and Reasonableness is an Addendum to that statement which contains the names of those persons who will testify and some of the general outline of the testimony. Marked as EDU Exhibit 9 is an Affidavit of the Notice of the State Board of Education Rule-making Mailing List. EDU Exhibit 10 is an Affidavit of Additional Notice of the State Board of Education Mailing List. EDU Exhibit 11 is an Affidavit of Mailing and finally, marked as EDU Exhibit 12 is the Certificate of the Mailing List.

Mr. Examiner, I offer these to you at this time.

EXAM. ERICKSON: As I stated previously these exhibits are just a procedure -- just a procedural documentation that was submitted to my office in compliance with the rules of the Office of Administrative Hearings. EDU Exhibits 1 - 12 are received. Dr. Waddick, do you or Dr. Droubie want to make a statement at this point or do you want to start right off with your witnesses?

(EDU Exhibits 1 - 12 received in evidence.)

DR. WADDICK: Mr. Erickson, the Department of Education on behalf of the State Board of Education would prefer to make a statement at this time and then lead into the witnesses.

EXAM. ERICKSON: You may proceed.

DR. WADDICK: Mr. Examiner, members of the audience, the Department of Education, State Board of Education, propose to promulgate the rules in question under the authorities of Minnesota Statute 125.03 and Minnesota Statute 125.115 as revised in 1980. Under those applicable statutes the State Board of Education is responsible for the licensure of coaches, that having come about as a result of the resolution of the autonomy for the Minnesota State Board of Teaching.

I would like, Mr. Examiner, to proceed to a reading of the Statement of Need and Reasonableness which was made available to all individuals as they entered the room. And I think that the Statement of Need and Reasonableness is sufficiently explicit, pertinent and germane that in fact it does deserve a fairly precise review before we begin entertaining testimony.

EXAM. ERICKSON: Excuse me, let's go off the

record.

(Off-the-record discussion.)

EXAM. ERICKSON: Back on the record. Dr. Waddick.

DR. WADDICK: I would suggest that individuals in the audience if they wish might turn to the Statement of Need and Reasonableness in which we feel that we have documented the appropriateness of the rule as is to be presented this morning.

The proposed rule 5 MCAR § 1.0533 the Department of Education feels to be necessary to implement licensure standards and procedures for head, and I underscore head, varsity coaches of interscholastic sports in senior high schools. At present, only head coaches in six boys' sports, and boys I believe, Mr. Examiner, should be underscored, are required to hold licensure. Those sports happen to be football, baseball, basketball, track, wrestling, and hockey. A rule which was to become effective in 1972 governing licensure of coaches of interscholastic sports for girls was repealed after the Commissioner of Human Rights determined that discrimination in the applicability of two separate coaching licensure rules, with differing criteria, one for boys and one for girls, would have existed. Subsequently, numerous meetings and public hearings were

conducted by the Board of Teaching, the Board of Education, in an attempt to enact an equitable coaching licensure rule which would not necessitate the elimination of athletic opportunities for students in secondary schools. I would append to the statement that one of the underlying motivations of the Board of Education and the Department of Education in promulgation of this rule has been and is to extend opportunity, to maintain opportunity and not to restrict opportunity through licensure rules.

In paragraph 2, Mr. Examiner, we attempt to document that the rule in question this morning was not developed in a vacuum, and as we have indicated it occurred after consultation, not necessarily agreement with, but consultation with all of the following organizations: The Minnesota Board of Teaching, Minnesota School Boards Association, the Minnesota Education Association, Minnesota Federation of Teachers, Minnesota State High School League, Association of Metropolitan School Districts, Minnesota State High School Coaching Association for Boys and Girls, Minnesota State High School Athletic Directors' Association, Minnesota colleges and universities, the Congress of Parents, Teachers and Students and MASA, the Minnesota Association of School Administrators

representing superintendents. These organizations responded to invitations and took part in meetings and provided input. Many other organizations were invited but for one reason or another did not respond. In addition, every school district in the state received a proposed draft of the rule and many of the districts did respond to the material provided to them. The State Board of Education believes that the proposed licensure rule 5 MCAR § 1.0533 has had extensive input and development through the process described above, and that the proposed rule is both needed and reasonable.

In looking at the content of the rule itself, Mr. Examiner, 1.0533 we feel to be needed to assure that those persons who serve as coaches of interscholastic sports will meet minimally acceptable standards. The proposed licensure rule is premised upon the very basic and very important presumption, namely, that coaching is teaching. Therefore, this proposed rule requires head varsity coaches of interscholastic sports in senior high schools to hold a valid Minnesota elementary or secondary teaching license. Again predicated upon the presumption, the assumption that coaching is teaching, and while a teaching license is no absolute guarantee of appropriateness of performance it is a better guarantee than

nothing whatsoever which is the alternative.

Section A. of the proposed rule addresses the requirement of a teaching license and the completion of a coaching preparation program approved by the Minnesota Board of Education leading to licensure of head varsity coaches of interscholastic sports. Programs of interscholastic sports are an integral part of the total school program and should be so designed as to be of educational value. Therefore, the Board believes that it is essential that coaches of interscholastic sports meet the licensure requirements stated in this rule and again that such individuals hold a valid Minnesota teaching license.

Section B. of that portion of the rule defines the head varsity coach as being a teacher who has primary responsibility for a senior high school varsity interscholastic sport. Interscholastic sports are defined as those sports in which there is scheduled competition with athletic teams of another school within and outside the school district. A senior high school we have defined as a secondary school consisting of grades 10 - 12 or grades 9 - 12 in a four-year secondary school, or grades 9 - 12 in a six-year secondary school. It is the position of the Board of Education that those ninth grade students taking part in

varsity interscholastic sports in a four-year or six-year secondary school should be included in the licensure rule for their health and safety.

Section C., of the rule, Mr. Examiner, is a compromise, and the rule I would note is latent with a number of compromises in an effort to adopt a rule which is pertinent, applicable and reasonable. This compromise is one which allows that there may be a severe shortage of coaches and we therefore indicate that assistant coaches and junior high school coaches are not required to hold licensure. Testimony has shown that programs would be severely curtailed and/or limited if this particular limitation were not included in the rule. Therefore, the proposed rule, unlike some of its antecedents, applies only to head coaches. It does not require licensure for assistant coaches and junior high coaches.

Ideally, the Board believes that assistant coaches and junior high school coaches should be prepared at least in the areas of first aid and care and prevention of athletic injuries. It is anticipated that school districts will endeavor to provide this minimal training on an in-service basis for assistant coaches and junior high school coaches. The decision not to require licensure for assistant and junior high

school coaches is based upon several factors. The State Board of Education recognizes that there has been a vast increase in school athletic programs and in participation, particularly for girls. An objective by the way which the Board has very strongly and ardently supported. This fact has created problems for staffing of the programs for males and females. The Board believes that by excluding assistant and junior high school coaches from the licensure requirement, the vast majority of the staffing problems will have been eliminated. It should be recognized, however, that no licensure rule will eliminate all staffing problems nor should licensure rules be expected to do so.

Section D., Mr. Examiner, of the proposed rule specifies the qualifications for coaching licensure. It is designed to contain the components determined by previous task forces to provide essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport. It should be noted, and this subject will receive some attention I'm sure in subsequent testimony this morning, that the rule establishes a maximum of 12 quarter or 9 semester hours of credit for all coaching programs that are submitted to the Board of Education for approval. I would note in passing, Mr. Examiner, that it is somewhat

unusual for the Board of Education to adopt a rule which would in fact impose a maximum for purposes of securing licensure. That is being done purposely and deliberately so as to put a reasonable cap upon the credit requirements that institutions of higher education might feel necessary and to make it likely that individuals will be present in sufficient number so as to secure the credits, the institutional affirmation of having done so and to be eligible for the licensure upon the receipt of the 12 quarter or 9 semester hours.

The Board, we continue in the Statement, recognizes that this attempt to limit programs to 12 quarter or 9 semester hours of credit may be opposed by a number of Minnesota colleges and universities. A number of colleges and universities will state that they are unable to prepare coaches with such a restricted number of credits. While many of the coaching programs in Minnesota colleges and universities currently range from 30 to 40 quarter hours of credit, it is the position of the Board that programs of such length are unnecessary for purposes of licensure under this rule so as to provide coaching opportunities in interscholastic sports. It is felt that a program requiring 30 to 40 hours of credit for purposes simply of

entry level licensure are prohibitive in length and will in fact accentuate recruiting problems at the school district levels. It is the position of the Board of Education that a preparation program consisting of 12 credit hours is a reasonable number of credits for licensure, and that colleges will be able to redesign and restructure some of their courses to accomplish a preparation program which provides the essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport within the parameters of the rule as proposed.

The 12 credits, Mr. Examiner, pertain only to those teachers who desire a coaching endorsement and are not physical education majors or minors. Persons who are preparing to be physical education teachers will, as part of their program, have completed a coaching preparation endorsement. This proposed rule does not prohibit a college or university from offering a coaching minor or major or a more extensive program for those who desire more preparation. It simply, and we underscore simply, requires completion of an approved program consisting of a maximum of 12 quarter credits for licensure as a coach of interscholastic sports.

Section E. of the proposed rule was introduced

again to ease any burdens that either individuals or school districts might incur in the accommodation to this rule. It is an alternate route to licensure. It permits a school district to contract with a college or university which offers an approved coaching licensure program and to develop a joint program that can be offered on an in-service basis in a Minnesota school district. This portion of the rule is intended to provide flexibility for those school districts that desire to prepare their own coaches on an in-service basis in conjunction with a college or university.

Mr. Examiner, Section F is another accommodation to the realities to which the Board of Education, the Department of Education and the Board of Teaching by the way are aware. It is a grandpersoning provision which states that teachers employed as a head varsity, assistant, or junior high school coach can be granted a coaching license provided that 6 quarter hours or 60 clock hours of instruction in first aid and the care and prevention of athletic injuries have been completed. It is the deliberate intention of Section F. to be generous in grandpersoning those teachers that have been serving as coaches and assistant coaches in order not to restrict the supply of coaches available for interscholastic coaching positions. The Board, however,

does feel that no grandpersoning should occur unless evidence can be provided of the minimal preparation specified in first aid and the care and prevention of athletic injuries. It should be noted that the Department of Education intends to be flexible in accepting 60 clock hours of instruction on an in-service basis such as the Red Cross or other appropriate agencies.

Section G. of the proposed rule establishes an effective date of July 1, 1982, a date which we think to be a sufficient accommodation for individuals to secure whatever training might be necessary in order to comply with the rule. This effective date is deemed reasonable because of the previously described we feel generous grandpersoning clause which we hope will not curtail the present supply of coaches. In addition, it is thought to be reasonable in terms of college preparation because there are 22 Minnesota colleges and universities which have the potential for offering such programs.

Section H., Mr. Examiner. In previous public hearings involving coaching licensure, school districts have indicated that unless special provisions were made for emergency licensure they would be required to curtail or to eliminate some athletic programs. Section H is again an accommodation to the

realities to which we have been exposed through discussion and the hearing process. Section H. is intended to address those hardship situations where a district may request that the Commissioner of Education provide a provisional license for a teacher to serve as an interscholastic coach while the preparation program is being completed.

This section requires that the provisional license be granted only to teachers, again based on the presumption that coaching is teaching and that individuals who are prepared to teach are those most adequately prepared to coach. The Board of Education does not believe that it is necessary or responsible to include the possibility of granting a provisional license to those persons who might wish to coach but who do not in fact possess a valid Minnesota teaching license. The Board believes that the hardship situations that districts may face can be accommodated by the provisions outlined in Section H of the proposed rule.

In closing, Mr. Examiner, Section I specifies that coaching licenses may be renewed under the same system that teaching licenses currently are renewed. It will not be necessary for coaches to follow a separate system for relicensure.

In summary, then, Mr. Examiner, and members of the hearing audience, the State Board of Education and the Department of Education, individuals who have collaborated in the preparation of this rule, believe that the proposed coaching rule is both needed and reasonable. The Board, the Department and the staff believe that the preparation outlined in the rule is the minimum amount of preparation needed to serve as a head varsity coach, while at the same time providing for any potential hardship situations that school districts may face in staffing coaching positions. We contend, Mr. Examiner, that this rule is necessary, that it is reasonable, and that it has--belongs and is proper to this hearing as an appropriate condition for the protection of Minnesota students engaging in interscholastic athletics.

I would wish, Mr. Examiner, if I may, to call and to introduce the testimony in support of the rule, and I would prefer to begin if I might with testimony forthcoming from the Minnesota State Board of Teaching to be presented I believe by Mr. Kenneth Peatross, Executive Secretary of the State Board of Teaching.

EXAM. ERICKSON: Mr. Peatross.

MR. PEATROSS: I am Kenneth Peatross,

spelled P-e-a-t-r-o-s-s, Executive Secretary of the State Board of Teaching.

EXAM. BECK: Your address?

MR. PEATROSS: 608 Capital Square Building, 550 Cedar Street, St. Paul, 55101.

Mr. Examiner, members of the Department, persons here interested in this public hearing, I should first like to advise you that on March 20, 1981, the Minnesota State Board of Teaching by Resolution took action to support the proposed rule of the Board of Education governing the licensure of head varsity coaches of interscholastic sports in senior high schools. To that extent, Mr. Examiner, I should like to make some specific comments with respect to the proposed rule.

Over the past some eight years I and members of the Board have had some very close connection with the proposition, proposing reasonable standards for the licensure of coaching personnel in Minnesota schools. Through that process, involving public hearings and other kinds of public meetings throughout the State of Minnesota, the Board of Teaching, as has the Board of Education, been supplied with good and substantial evidence and documentation with none to my knowledge to the contrary that interscholastic

sports exist in Minnesota Public Schools to provide equal educational opportunity for students attending those schools, that the purpose for interscholastic sports programs existing in the schools is for the educational value to be derived from those programs for the students who participate in them. One major evidence of this is that we expend public funds to support interscholastic programs as we expend public funds to support the other educational activities that are part of our school system.

Therefore, Mr. Examiner, the Board of Teaching wishes to underscore the provision of the rule which states that persons who are licensed to perform head varsity coaching functions within our schools must hold a valid Minnesota Teaching license which is a measure to insure that that person has been prepared as a teacher and can apply those skills to the coaching function.

We recognize, as Dr. Waddick has stated in the very fine presentation of the Statement of Need, that these are minimal standards. Much work has gone into this from all sections of the State in terms of trying to provide reasonable standards to insure the health, safety and well being of young people who engage in interscholastic sports. Recognizing that it is a

set of minimal standards we believe that the rule makes adequate provision to insure that there will be no curtailment of interscholastic sports programs in our schools and yet through the various types of provisions, both the preparatory program, the provisions for in-service activities within school districts, the provisions for hardship situations, that the rule adequately and appropriately and reasonably addresses the assurance of qualified coaching personnel in our schools and at the same time insures that such requirements will not in any way provide us with a situation in which we would see a decline of interscholastic sport programs in our schools.

Mr. Examiner, I would conclude my remarks at this point in time. I would be glad to entertain any questions from representatives of the Department.

EXAM. ERICKSON: Any questions? Thank you, Mr. Peatross.

MR. PEATROSS: Thank you.

EXAM. ERICKSON: Dr. Waddick, you may call your next witness.

DR. WADDICK: I would next like to call Dan Moriarty, representing the Minnesota Education Association.

EXAM. ERICKSON: Mr. Moriarty, please state,

spell your name and give your address.

MR. MORIARTY: Dan Moriarty, D-a-n, M-o-r-i-a-r-t-y, Minnesota Education Association, 41 Sherburne Avenue, St. Paul, 55103.

Mr. Examiner, the Minnesota Education Association supports the need for this rule to protect the interests of students and parents and the licensed personnel involved. MEA believes that the extracurricular activities -- that extracurricular activities are an important part of the educational process and as such, as has been mentioned before this morning, are an important part of teaching, and it's for that reason that we strongly believe that these activities should be conducted and supervised by licensed teachers whenever and wherever possible.

MEA understands, however, that some districts are having difficulties in attempting to accomplish this goal. Finding licensed personnel to handle the many school activities is a problem. We must comment, however, that more teachers would probably be available if they were better compensated for the long overtime hours, the heavy responsibilities and the tremendous pressures plus given some relief from the regular teaching duties.

Because of the current shortage of coaches

and because MEA supports the concept that those currently performing the services in the field should be grandpersoned, MEA is particularly supportive of Section F of this rule. We also believe that Section E when combined with Section F provides a reasonable process for assuring enough qualified personnel plus leaving the control factor principally at the local level. Local districts should be given the major responsibility for determining the competence of its coaching personnel and providing the necessary training for those who require the need. Since the ultimate accountability to students, parents and the community rests at the local level, school districts should have the chief responsibility to make this determination.

With the implementation of this rule, MEA believes the districts will be able to retain and recruit teacher coaches in sufficient numbers to meet their needs. If not, Section H provides for hardship cases.

Again we would like to emphasize the need to keep extracurricular activities tied as closely as possible to the educational process for the total development of the student and that means assigning teachers as coaches as often as possible. Thank you for your consideration of our comments.

EXAM. ERICKSON: Thank you.

DR. WADDICK: Mr. Examiner, we would next like to call for testimony Mr. Al Olson, representing the Minnesota Federation of Teachers.

EXAM. ERICKSON: Mr. Olson, please state and spell your name and give your address.

MR. OLSON: Alan Olson, A-l-a-n, O-l-s-o-n, Minnesota Federation of Teachers, 175 Aurora Avenue, St. Paul, 55103.

Mr. Examiner, members of the audience, the position the Minnesota Federation of Teachers has taken on coaching licensure is based on two premises. Number one, as has been stated, we also believe that coaching is teaching. That coaching is the same type of teaching that goes on in the classroom, teaching beyond just the mechanical skills of playing a game, teaching such things as teamwork, socialization skills, communication skills, training and personal health skills and because of these types of teaching activities we believe that coaches must be trained in all aspects of teaching functions.

The second premise that we base our position on is that by the nature of many of the athletic events there is high risk factors. Because of this we believe that the people that are coaching must be trained in

the care and prevention of athletic injuries and that the safety, health and welfare of the student be of utmost in our minds when we send people out there to do these coaching activities.

Now with these premises in mind the Minnesota Federation of Teachers has the following positions on coaches licensure.

Number one, it is our belief that all head coaches of interscholastic sports at every level should be required to hold a teaching license and a coaching license. To obtain that licensure we agree with the proposed rule Section D, the requirements stated therein.

Number two, we believe that non-teachers be allowed to assist licensed coaches under an on-site supervisory relationship only.

Number three, that an alternative plan be made available to allow districts to provide licensing requirements through in-service. We wholeheartedly agree with the Section E proposed in the rule.

Number four, that any licensure plan should have special provisions for those people who already are head coaches, and again we agree wholeheartedly with Section F, the grandperson provision in the proposed rule.

Now as you can see in our position we go a

little farther than the rule, in that we believe all head coaches should be licensed, but even though this proposed rule is not exactly what we propose, we do feel that it is a step in the right direction to help assure that athletics be a professional teaching function of the school district and that the safety and well-being of the students will be protected. We whole-heartedly support this rule. Thank you for your time and consideration in this matter.

EXAM. ERICKSON: Thank you, Mr. Olson.

DR. WADDICK: Mr. Examiner, we had suggested to you in one of the exhibits provided by Ms. Fishman that there would be two additional oral presentations to be made. One, by the Minnesota State High School League. That presentation I expect will not be orally made. You are in receipt, however, of a letter of support from the High School League for the rule as proposed. And we had anticipated a presentation to be made by the Minnesota Parent, Teacher, Student Association, and the individual whom I had expected to make that presentation, unless he has been replaced by somebody else, appears not to be in the audience, but may arrive sometime later in the morning, and if so, we would wish that that individual would then have the opportunity to speak, so Mr. Examiner, I believe that

concludes the oral presentation by the Department and individuals whom we were familiar with who were found to be in support of the rules as proposed.

EXAM. ERICKSON: At this point we will take one more witness and then we will take a break. Mr. McMoore. Please state and spell your name and give your address.

MR. McMOORE: Donald W. McMoore, D-o-n-a-l-d, W. M-c-M-o-o-r-e, 807 N. E. Broadway, Minneapolis, 55413.

Mr. Hearing Examiner, my name is Donald W. McMoore, Director of Health, Physical Education and Athletics for the Minneapolis Public Schools.

As Director of Athletics for the Minneapolis Public Schools, included in my responsibilities is the task of working with building principals and the Personnel Department in an effort to fill coaching positions at the ten high schools.

Because of the tremendous number of turnovers of staff within the district in the past few years, it has become a horrendous task to fill positions with local staff people. As a result of this and in an effort to continue to provide boys and girls with athletic opportunities, many non-teachers have been hired to coach who, in my judgment, have the expertise to perpetuate what I deem as being a quality program.

This move has become necessary because many of our older teachers have made the choice to discontinue coaching. As you are aware, Special School District #1 like many other districts, is experiencing an enrollment decline. This decline has forced reductions in the number of teachers needed. In addition, the reductions, because of teacher seniority provisions, have come from the ranks of less experienced teachers; generally, it is from these ranks that we recruit coaches. In a large district, such as Minneapolis, the more experienced teachers may have "coaching burnout" or have not kept up-to-date with additional requirements for coaching certification. There may be a conflict of interest between the seniority rights of teachers and the need for qualified coaches in districts with declining student enrollments.

That Whereas, the Minneapolis Public Schools sponsors twenty-one interscholastic athletic opportunities for boys and girls enrolled in the district's ten high schools;

And Whereas, these interscholastic options are part of the overall educational program for boys and girls;

And Whereas, citizens expect the Minneapolis Public Schools to continue to provide this variety of

educational opportunities;

And Whereas, the school district's employment policies state that seniority is the deciding factor in determining tenure for its teachers;

And Whereas, as a direct result of the seniority factor determining employment, many young teacher-coaches are being excessed because of declining enrollment;

And Whereas, many older teachers have made the decision to discontinue involvement in these twenty-one interscholastic athletic opportunities for boys and girls;

And Whereas, in the ensuing years, some schools, because of varied reasons including lack of coaches, may curtail participation in some of these educational opportunities;

And Whereas, because of these curtailments in particular schools, boys and girls may be deprived of the option to continue to participate;

Now Therefore Be it Resolved That: The Department of Health, Physical Education and Athletics of the Minneapolis Public Schools and the Minneapolis Public School Board of Education requests that the Minnesota Board of Teaching repeal the suggested requirements for coaching licensure as outlined in the proposal

5 MCAR 1.0533 regarding Head Varsity coaches of Interscholastic Sports in senior high schools. If the above resolution is not acceptable, Minneapolis, being a city of the first class, requests permission to in-service coaches for licensure. I will entertain any questions from the Board of Education.

EXAM. ERICKSON: Dr. Waddick?

DR. WADDICK: Mr. Examiner. Mr. McMoore, thank you for sharing your statement with us. I think for the record, Mr. Examiner, we would wish to note that this hearing is being conducted under the auspices of the Minnesota State Board of Education, not the State Board of Teaching, and that if a rule were to be adopted would be a rule of the Minnesota State Board of Education, not the Board of Teaching, Mr. McMoore.

Secondly, your Resolution indicates that seniority is a factor which you utilize in the employment of individuals within the Minneapolis School District. I presume that is a factor which is applicable to employment of individuals under virtually all master contracts across the State of Minnesota, which causes me to think that your situation regarding employment is not unique to Minneapolis in itself.

Thirdly, Mr. McMoore, the final Whereas on the first page as you submitted it, indicates

a major concern on your part and the district about potential curtailment in participation as a result of the possible promulgation of the rule. I think the position from which the Department of Education personnel have come in working on this rule is an effort to weigh the desirability of involvement in a program operated by less than adequately prepared coaches, one demonstration of that being attainment of licensure versus the potential of harm that could come about as a result of instruction, training and coaching at the hands of individuals who are not appropriately trained to provide that instruction. You indicate, Mr. McMoore, that students may be deprived of the option to continue to participate in the event that this rule were to be applicable. I was last evening in preparation for this rule hearing reading an article dated, Mr. Examiner, February 8, 1981, from the St. Paul Sunday Pioneer Press, which demonstrated very abundantly -- and I would like at the conclusion of this hearing to read this or at least to introduce it into the record -- the consequences of athletic involvement with individuals who are less than adequately trained. An individual who I happen to know and respect in that article, Mr. McMoore, indicates that at the current time only 25 percent of the Minnesota coaches have been prepared in

current first aid techniques and information. I consider that to be appalling, and I consider that 25 percent level would be even lower in the absence of some kind of a licensure standard.

Mr. McMoore, as a final point in your concluding portion of the Resolution you indicate that if your proposal which would be as you say to repeal the proposed rule is not acceptable, and it would not be a repeal but a failure to adopt, you would wish the authority as a city of the first class -- and your status as a city of the first class is inappropriate. Your status is as a school district by the way -- requests permission to in-service coaches for licensure, and I think I would contend that that is exactly the authority that you have under 5 MCAR 1.0533, Section E, which is the alternate route to licensure which would provide the district as the major school district in Minnesota still the opportunity to probably inexpensively and I would think expediently provide that kind of training over the year of time that would be available to result in the licensure which hopefully your teaching personnel would wish to attain, those who do not have it.

Mr. McMoore, I made a long series of comments in connection with the Resolution, but I think

that they are reasonable, pertinent and your Resolution I think also contains some concerns that you have expressed at previous hearings to the Board of Teaching.

MR. McMOORE: May I respond to some of your comments? What was initially -- what was the first comment that you made?

DR. WADDICK: My first comment, Mr. McMoore, was to indicate that the Board of Teaching is not the Agency that is promulgating the rules, but the Minnesota State Board of Education.

MR. McMOORE: That's my mistake. That's inconsequential in terms of what I am talking about.

DR. WADDICK: It's a technicality.

MR. McMOORE: What was the second statement you made?

DR. WADDICK: The second statement that I made, Mr. McMoore, was to acknowledge the portion of your Resolution in which you indicate that seniority is one of the employment provisions by which coaches are secured in Minneapolis.

MR. McMOORE: The teachers are secured, and as I indicated to you further, that because of this the younger teachers are being laid off and they are the ones -- they are the people who really we look to for coaches and for reasons -- one reason or the

other, older teachers choose not to participate. I am not saying we are unique. I understand that. I understand that most school districts because of their affiliation with the federations and etc. hire in terms or retain persons in terms of seniority. I understand that, so I am not trying to be unique in that. I am just stressing that to you to try to indicate to you some of the concerns that I have.

I believe you mentioned something about the last statement, about in-servicing your own teachers, rather coaches. If you notice I read -- fully read your proposal, and what I am suggesting is that without having any contact with the colleges and universities, we can do the same kind of things. We have many, as I indicated to you before, we have many older teachers who are still teaching in our school system who have had a background of coaching experience and I see no reason why we should have to go through the colleges and universities to require or rather to permit these people to do in-services for our teachers and coaches.

EXAM. ERICKSON: Mr. McMoore, then you are proposing then that you do that in-servicing yourself with your own personnel rather than contract with colleges and universities?

MR. McMOORE: That's right, because

basically it's a dollar issue. Someone else mentioned something about teachers should be better compensated to coach and also said something about they should be given additional relief time. All of that costs money. All of that costs money and I believe -- I can't speak for other districts. I can speak for Minneapolis. Our district is like many districts, we are having some financial problems and everything is predicated around dollars. That's why the suggestion that someone else made about coaching being better compensated, fine, if there is dollars to compensate, but there is no dollars to compensate, so we are trying to find an economical way in which we can get our people licensed, if in fact this rule is passed.

DR. WADDICK: And I would think, Mr. Examiner and Mr. McMoore, that the rule does cover the possibility of those kinds of arrangements under the Section E which I cited.

MR. McMOORE: If in fact the universities and colleges will allow us to do this at no expense to the school district or to the students involved, fine. It is based on dollars.

DR. WADDICK: I think, Mr. Examiner, Mr. McMoore, it's probably unlikely that any of this kind of activity is going to be accomplished with absolutely

no expense by anybody, but I think that the expenses could be accommodated to because of the size of your district as an adjunct faculty to the university or some other training institution were Minneapolis to propose to pursue that route.

MR. McMOORE: Thank you, Mr. Examiner.

EXAM. ERICKSON: At this point we will take a 10 minute recess.

(Whereupon a short recess was taken.)

EXAM. ERICKSON: Back on the record. We just had an off-the-record discussion and no one in the public has indicated that they need longer than five working days to submit written comments. In addition, the Agency has requested that the record be closed at the end of the working day on Thursday, April 9th, which is five working days from today's date. Consequently the record will close at the end of the working day on Thursday, April 9th. Mr. Mitchell, please state and spell your name and give your address.

MR. MITCHELL: I am Jim Mitchell, Superintendent of Schools, Fairmont, Minnesota. My address is 115 South Park Street, Fairmont. I am speaking against part of the proposed change and that is the part that requires a teaching license in order to coach. I am representing not only the Fairmont School

District but seven other school districts in Martin County and also the Superintendents in the South Central Conference which includes St. Peter, Waseca, Wells, Blue Earth, St. James and New Ulm.

Using Fairmont as an example, over the last four years we have reduced 35 certified staff positions and most of the teachers are -- in fact all of them that were reduced are the lowest on seniority and most of them had extracurricular responsibilities. Due to the reduction in force in Fairmont it has been necessary for us to recruit coaches from the community. This year we have 12 citizens who are not teachers who are coaching in assistant coach capacity. One of the other Superintendents in Martin County indicated to me last week that if you can walk as a teacher you coach in my school district and everybody coaches and I still don't have enough to fill the coaching needs and as a result must go to the community, so I guess what I am saying here is that if it reaches a point where you can't find anybody from your teaching staff to assume the responsibility as head coach the question comes, do we discontinue opportunities for kids or do we take somebody from the community, give them the necessary courses that you are requiring, which we don't have any disagreement in that, the first aid, psychology

of coaching, but let him then coach and not make this person go back to get a four year teaching certificate in order to assume this responsibility.

Very quickly let me just conclude by saying that our girls gymnastics coach has resigned. The person who -- the only person who is interested in that job is somebody from the community who has a physical education teaching major certified in a different state and has had six years of head coaching experience, would be willing to take on this responsibility, does not want to go back and get a teaching certificate in the State of Minnesota because she does not want to teach fulltime. If this rule goes through this person would not be eligible. We have just had a resignation from our girls basketball coach. The assistant coach is a pastor in the community, does an outstanding job as a coach. He is the only candidate for the position. He does not intend to go back through four years to get a teaching license. We will be discontinuing two major sports in Fairmont if this change goes through and in the next three years we are projecting a reduction of 22 more staff positions. We are going to wipe out our extracurricular program. Questions?

EXAM. ERICKSON: Thank you. Any questions from the Agency? Thank you, Mr. Mitchell. Dr. Waddick,

I'm sorry.

DR. WADDICK: One of the purposes for hearings of this sort obviously is to acquaint individuals who propose rules with the realities that exist out in the field in the event that the rule were to be implemented. You provided us a real time situation in your school district. You cited gymnastics which I consider to be a high risk sport with the likelihood of some tort liability associated with it in a degree greater than that of other sports. How willing is the district to entertain the opportunity of experiencing a very expensive suit possible by having employed an individual who is not licensed?

MR. MITCHELL: As I stated, Dr. Waddick, this person -- the only separation that she has from becoming a certified teacher in the State of Minnesota is the fact that she has not taken the Human Relations course and it is the idea that she would have to go back and do that. I don't see that there would be any liability on the part of the school district. If we were to hire somebody for that sport that had had absolutely no training in gymnastics I think that we would be liable, but in this case that I just gave you, and I was using gymnastics as an example, that we have a person who has a teaching license from a different state.

Now I guess what we are saying is that that teaching license from Minnesota is better than the teaching license from Iowa, and I don't see a liability problem with the example that I gave.

DR. WADDICK: May I ask, Mr. Examiner, further to embellish upon our understanding of the real world, what is the salary of -- at which you would employ such an individual, Mr. Mitchell?

MR. MITCHELL: $1800.

DR. WADDICK: And the individual would prefer to forfeit $1800 as opposed to negotiating with the Teacher Licensing Section of the Department of Education about a provisional arrangement?

MR. MITCHELL: What I am suggesting, Dr. Waddick, is that within the arrangement guidelines that there would be exceptions to this where a person would be able to become the coach without having the teacher's certificate. The hardship clause is good for a year or two years, but at that point if she has not received a teaching certificate as you have defined, she is no longer eligible to coach, so you can negotiate it, sure, for a year or possibly two, but what happens at that point?

DR. WADDICK: Mr. Examiner, moving to a more positive approach, because we are going to hear

this kind of testimony throughout the morning, I expect, and perhaps we can diminish some of it, I would like to ask Mr. Mitchell as a functioning practicing superintendent of schools, what would you propose as a practical positive alternative arrangement to the enigma that you are suggesting that you are going to experience?

MR. MITCHELL: I would propose that once a school district has exhausted all available staff members or resources within the certified teaching ranks to assume a head coaching position, that they be allowed to go to non-certified people as long as this person meets the requirements for the coaching certificate which includes the courses that have already been defined.

DR. WADDICK: Mr. Examiner, Mr. Mitchell, would you propose that to be an arrangement in perpetuity or an arrangement that would be annually reviewable?

MR. MITCHELL: I would prefer that it be indefinite, that it would not have to be annually reviewable.

DR. WADDICK: Thank you.

EXAM. ERICKSON: Thank you, Mr. Mitchell. Tom Porter. Mr. Porter, please state and spell your name and give your address.

MR. PORTER: Tom Porter, P-o-r-t-e-r. I

am the Chairman of the Department of Physical Education at St. Olaf College, Northfield, Minnesota 55057. Mr. Examiner, having been assured that previously submitted statements to you and to the Department of Education by our Department and by several members of our Department are as good as having them read here I will not take the time to reiterate the points and the arguments presented in them. The main topic that we had was the term maximum. But I would like to enter for the record the extreme concern expressed by our Department of Education then with the maximum limitations and concern that this might be a precedent setting situation that would have ramifications as far as future regulations for teacher training and teacher certification in other areas, and I thank you for the time and I will not take the time to duplicate the statements that have already been submitted.

EXAM. ERICKSON: Mr. Porter, what kind of a maximum credit limitation could you live with, do you think?

MR. PORTER: Our Statement from the Department to you, we suggested that some range of requirements would be much more acceptable rather than the maximum, and we would have difficulty accepting the terminology presented previously this morning and

minimal and adequate, we find these things at contrast, and in our statement to you we have suggested a range of semester or quarter credits that would be more acceptable.

EXAM. ERICKSON: Dr. Waddick.

DR. WADDICK: Mr. Examiner, and Mr. Porter -- Dr. Porter, you have alluded to a range, and I think we have seen some correspondence from several of the institutions of higher education. Our maximum-minimum or minimum-maximum, whichever, was proposed as 12 quarter credits. What kind of a range would you propose?

MR. PORTER: We are on a semester basis, so that would be 9 semester credits, and our suggestion as we stated was 9 to 15 semester credits. Our present requirements at this time for coaching certification come to 11 semester credits.

DR. WADDICK: 9 to 15 in terms of semester hours would be equivalent to 12 to 18 quarter hours, isn't it?

MR. PORTER: Approximately.

DR. WADDICK: Thank you.

EXAM. ERICKSON: Thank you. Alan Page. Mr. Page, please state and spell your name, give your address.

MR. PAGE: My name is Alan Page, A-l-a-n, P-a-g-e, here representing Breck School. I am with the law firm of Lindquist and Vennum, 4200 IDS Center, Minneapolis, 55402.

Mr. Examiner, members of the audience, I would first like to state that we are not here to raise any issues as to reasonable rules regarding first aid and the care and prevention of the athletic injuries. Breck School has its own -- is beginning its own in-service program to provide for the training in the area of first aid and the care and prevention of athletic injuries. However I am here to raise the issue of an independent school being subject to the licensure or the certificate requirement for head school coaches or head varsity coaches. Breck School is an accredited school accredited by the Independent School Association of the Central States and as such is required to meet all the requirements that they have to maintain that accreditation, and Breck School does not feel that the State has the right or the responsibility to dictate to independent schools their teaching requirements.

The view from the independent -- from Breck at least is that this is an attempt by the State to infringe upon its right to hire coaches by going through -- hire teachers by going through coaching

responsibilities. The Minnesota High School League four years ago agreed not to impose across the board certification of -- certification standards for varsity coaches in independent schools and as I said before this is viewed as an attempt to control the certification process of school teachers through coaching responsibilities. Breck wants to voice a strong objection to any attempt along that line.

As I mentioned before Breck is an accredited school through ISACS, and that goes for both the academic as well as extracurricular activities. Breck School hires teachers from across the country. Approximately 80 percent of its teachers do have Minnesota teaching certificates, however there are those who do not, and in any given year of the new teachers anywhere from 10 to 40 percent will not have a Minnesota teaching license, and to cite you an example of what something like this would mean to schools such as Breck, one of its coaches, the soccer coach, is Roy McCrohan, I think it's M-c-C-r-o-h-a-n, he is the former coach of the Minnesota Kicks, in the NASL, and to -- he is not a licensed teacher and would be almost impossible to at this stage fulfill the requirements for a teaching license, and to lose that kind of skill and ability in coaching young children would be a tragedy.

As I said before there is no concern on our part about reasonable rules and regulations regarding the first aid and the care and prevention of injuries. That is something that I don't think anybody can argue with. Thank you.

EXAM. ERICKSON: Dr. Waddick.

DR. WADDICK: Mr. Examiner, Mr. Page, I don't know how Breck School developed the notion that the State of Minnesota was intending by this rule to require licensure of its teaching staff because that to the best of my knowledge has not been the intent nor under current statute does the State of Minnesota have the authority to require licensure of non-public teaching staff and therefore while I find your testimony interesting in the event that we were ever to begin proposing licensure of non-public staff, that, Mr. Examiner, is not the intent and the association with this rule, nor is it a power of the State Board of Education at this time.

MR. PAGE: I guess our purpose was to make sure that that was not your purpose and that it is not your purpose.

EXAM. ERICKSON: I take it, though, the implication is that because of the fact that the coaches have to be licensed teachers that necessarily overlaps

into the teaching makeup of Breck School, is that correct?

MR. PAGE: Yes.

EXAM. ERICKSON: What arrangement is it that if the State doesn't have licensure requirements for teachers at the independent or the private schools, what arrangement is it that that -- well, that makes them able to control the licensure of coaches? Dr. Droubie?

DR. DROUBIE: Mr. Examiner, the licensing rules indicate that simply -- any licensing rule that anyone that is eligible for a license may apply for it but our authority does not extend to teachers and coaches in non-public schools.

EXAM. ERICKSON: Okay.

DR. DROUBIE: Anyone in a non-public school that is a teacher may apply for a license and if they are eligible they will be granted on the same basis as one in a public school, but we have no licensing authority over those schools.

EXAM. ERICKSON: Either teachers or coaches, is that correct?

DR. DROUBIE: That is correct, and Mr. Page's concern is not reflected in the language of the rule at all or any statute.

EXAM. ERICKSON: Okay, thank you, Mr. Page. Jack Amann.

MR. AMANN: My name is Jack Amann, A-m-a-n-n, Mankato State University, P. O. Box 28. I am Chairperson of the Physical Education Department. I apologize for my voice quality so I will try to keep it brief, but I will steer my comments toward the word again maximum credit hours required for certification.

It would be very difficult for Mankato State University to adequately prepare coaches in the five areas that were listed by the proposal in a matter of 12 quarter hours. We have had an ongoing reduction of our courses that we have offered in our coaching certification program over the past number of years and we can no longer do this and feel adequate in preparing people professionally.

I do not know where the figures of the margin of 30 to 40 hours at the state universities and colleges came from. I have been under the impression that the range was more like 24 to 31 credit hours across the State. I may be wrong. That is only on hearsay or inquiry. We are at 25 or 26 at Mankato State. We could reduce and without feasibility down to perhaps 18 credit hours, but I would feel very inadequate -- I would feel ashamed perhaps of backing

anybody going into the field with that type of preparation. Let me give you an example. We took one course to try to meet the needs that are evident in school administration in filling positions, and particularly in the sciences. This is difficult. We instituted a course called Scientific Foundations of Coaching, which incorporated anatomy, kinesiology and exercise physiology. We are having problems with that. We are not doing the job. We are team teaching. If you are talking about economics, as Mr. McMoore did, we have those problems also. We cannot afford to use three teachers for one course to make that course apply to preparation. So it would be very difficult for us to come down to that maximum of 12. I am sure that we would fade out of the picture and merely establish coaching minor for those who are in need of it, and let the in-service job -- in-service approach do the job as the schools want to do this. We could not -- we will not relinquish our moral and ethical responsibility for preparing any students for any profession.

EXAM. ERICKSON: Thank you. Dr. Waddick?

DR. WADDICK: Mr.Examiner, Dr. Amann, so that I am sure that I heard you properly, you indicate while reluctant to reduce the range that currently seems to be a mean of about 25 credit hours, 18 might

be doable, is that --

MR. AMANN: 18 would be doable, but with reservation. I would agree with whomever the Board communicated at the higher education level as you stated earlier in your reading, I would agree that there are some courses being required in coaching certification now that could be considered luxuries. That is my personal opinion. That is the opinion of some of my staff members. For instance sport administration, athletic management control, what have you. I am -- I do not agree that that should probably be a requirement to prepare a coach. It should be a requirement to prepare an athletic director who is possibly in a dual role. Officiating is required, exposure to officiating on a practice basis, that is being required. I am not so sure that that is necessary. I have trouble with the idea of in order to coach, be a certified teacher and take the same courses that we are using to have teachers become certified and for lack of a better term water it down, to do the same thing with coaches and that is what we would have to do and as I said particularly in the science area as per the proposal.

EXAM. ERICKSON: Dr. Waddick.

DR. WADDICK: Mr. Examiner, Dr. Amann, you

indicated if I heard you properly that morally and ethically Mankato State would be reluctant or in fact would not engage in a training program which offered people as being trained with a minimum of 12 quarter hours.

MR. AMANN: That's right.

DR. WADDICK: How do you feel about proposals that some people have advanced, if I may, Mr. Examiner, that perhaps a week and a half of training would be adequate to be recognized as a coach?

MR. AMANN: I could not accept that.

DR. WADDICK: Thank you.

EXAM. ERICKSON: Thank you, Dr. Amann. Judy Johnson. Ms. Johnson, please state and spell your name and give your address.

MS. JOHNSON: My name is Judy Johnson, J-o-h-n-s-o-n, Burnsville High School, 600 East Highway 13, Burnsville, Minnesota 55337.

Mr. Examiner, I am here representing the Minnesota State High School Coaches Association for Girls Sports, Inc. Theoretically, the Coaches Association supports the rules developed by the Education Department. We believe coaching is teaching, and coaches at all levels should have teaching expertise. The grandparent clause provides the majority of present

head varsity coaches in girls sports an opportunity to qualify immediately.

One question that does not seem to be formally addressed happens in the following situation: A person with a teaching license with coaching certification coaches, but does not teach. His or her teaching license expires and cannot be renewed because of lack of experience. May this person coach without a valid teaching license?

Realistically, the Coaches Association feels compelled to respond to the present shortage of qualified coaches, particularly women. The growth of girls sports in the past decade and the teacher cuts in many districts have contributed to the shortage of coaches. Just by my own example I coach in the Lake Conference. I coach basketball. Out of 18 coaches of girls' basketball two are women. In Region 1, which is in southern Minnesota there are 16 girls' basketball coaches. Two are women. We feel it is very important to our young female athletes to have women as coaches and role models. Presently, the majority of women qualified to coach is young but unable to acquire permanent teaching positions. Many young people are discouraged from going into education because of the limited job opportunities, yet have a desire to coach. We are

finding that many companies and businesses provide flexible hours so that a person could meet his or her coaching responsibilities.

As an alternate route to receiving coaching licensure, we would like to propose the following: a person may coach at the varsity level if he or she possesses a bachelor's degree from an accredited college, or university, plus a coaching minor. This coaching minor would include all the courses cited in 5 MCAR § 1.0533 and the supervised coaching practicum. The coaching minor could include additional courses beyond these so that the school would be confident the coach is familiar with educational organization, procedures, and policies.

The Coaches Association for Girls Sports sincerely hopes you will consider our proposal as another avenue to gain coaching licensure. We feel it is a partial solution to a complex problem.

EXAM. ERICKSON: Thank you. Any questions by the Agency? Dr. Droubie?

DR. DROUBIE: Mr. Examiner and Ms. Johnson, in reply to your question about the renewal of a teaching license, the rule that we are proposing for coaching licensure is based upon the premise that the person does hold a valid teaching license and it does not expire.

The person would have to maintain a teaching license, but the rule is written in such a way that the coaching license will expire on exactly the same day that the teaching license expires. All of them can be renewed simultaneously through the same continuing education committee through a local school district, so we are not talking about a separate renewal system, different from that required to maintain say an elementary teaching license or social studies teaching license. It would all be done together simultaneously for a total of 120 renewal units currently required now, so we are not proposing a separate system at all.

EXAM. ERICKSON: Dr. Droubie, can a teacher who just coaches but doesn't teach, can they renew their teaching license?

DR. DROUBIE: Yes, under the present continuing education system you can maintain your teaching license without actively teaching.

EXAM. ERICKSON: Further questions? Thank you, Ms. Johnson. Rex Domino. Please state and spell your name and give your address.

MR. DOMINO: R-e-x, D-o-m-i-n-o, Dover-Eyota High School, E-y-o-t-a, Athletic Director, Eyota, Minnesota, 55934. Most of the things I come to testify here about have already been taken care of, but

I do have one question here that I would like to ask and I would hope that it would be cleared up for me. It's been stated several times that the rule is concerned about the health, safety and well-being of our athletes in our schools, but according to the rule that's being passed here, it seems to be saying more so we are concerned about the health, safety, well-being for varsity sports only, and I would just like a clarification on that, because we are only saying that the varsity sports are the only ones who need to have the athletic training or the first aid, so on, and if you would correct me if I am not right in saying this, that you suggested it would be a good thing for B Squad, junior high, junior varsity coaches, is that they would have some type of in-service training given by the school, and I wondered if we can do it for those coaches, if we couldn't do it also for varsity coaches.

EXAM. ERICKSON: Dr. Waddick.

DR. WADDICK: Mr. Examiner, Mr. Domino, you have struck upon one of the areas of accommodation in the Statement of Need and Reasonableness that I spoke to. As was indicated by Kenneth Peatross, Executive Secretary for the Board of Teaching, this rule has been some eight years in the process of development and has gone through several public hearings. It was

alleged in prior public hearings that the rule embraced far too large an area of applicability. Consequently we have reduced its area of applicability at the current moment only to varsity sports. I think that the intimation of your comment is that in that connection the rule is less than adequate, or conversely, deficient, because a student could as easily be injured in other levels of competition as could occur in interscholastic varsity competition. The Department of Education at least on the behalf of the people who participated in creating the rule recognized that. We recognize that as both a limitation and a deficiency and it represents a compromise with the realities that people have continued to advise us of and I think professionally I take some small degree of umbrage with your comments because you have identified for us an area in which the rule is less than adequate.

MR. DOMINO: Okay.

EXAM. ERICKSON: Thank you. R. L. Thienes.

MR. THIENES: Mr. Examiner, that was better than most. My name is Robert Thienes, T-h-i-e-n-e-s. I am principal of White Bear Senior High School, 5040 Bald Eagle Avenue, White Bear Lake, 55110. I am here speaking on behalf of the St. Paul Suburban Conference which represents 10 schools, basically the northeast and

south of St. Paul.

All of us are experiencing the same thing that our first speakers spoke to this morning, and I won't repeat, except for an example. I have over 23 teachers with more than 20 years of experience, that I have not been able to hire a teacher coming from the University for the last three or four years. We don't anticipate being able to do that in the near future. We do, however, in all of our schools have experienced teachers both in the area of health, in the area of coaching, the area of physical education. We believe that Section I believe it is E should be modified to the point to present school districts to provide their own program using certified people in the same like manner that we did in qualifying people for Human Relations. Thank you.

EXAM. ERICKSON: Dr. Waddick.

DR. WADDICK: Mr. Examiner, Mr. Thienes, you concluded so quickly that I am still trying to track what it was you said in your final sentence. Would you repeat that?

MR. THIENES: I am quite certain that I cannot repeat it word for word, but take paragraph E of your proposal, alternative routes to licensing. What we are merely suggesting is that school districts

be empowered to propose and conduct their own program with their own experienced teachers in the same manner that we were able to do for Human Relations.

DR. WADDICK: It was that point, Mr. Examiner, Mr. Thienes, that -- where I fell off the stream of your comment. What did you do with your own teachers in relation to Human Relations?

MR. THIENES: Well, we had a district organized program under the direction of one of the Assistant Superintendents. We brought in people from various areas that conducted the program, not necessarily from colleges and universities, but people from the community, and submitted, from what I recall, a comprehensive program, to somebody for approval.

DR. WADDICK: I think probably, Mr. Thienes, Mr. Examiner, submitted that to another portion of the Division within the Department of Education for which I am responsible. At that time would that have been the Equal Educational Opportunities Section that was reviewing that?

DR. DROUBIE: Yes, Mr. Erickson, there is an essential difference. It is true that Human Relations programs were conducted differently. School districts were permitted to develop their own program but what we have here is a rule that addresses the preparation

of teachers. The Human Relations program was simply intended to develop an awareness of Human Relations problems. It was not a teacher preparation rule, but this rule addresses the preparation of coaches to actually teach and in that sense it was felt to be desirable to conduct that on an alternative basis in conjunction with colleges and universities and that is why the Human Relations program was done a little bit differently, Mr. Erickson.

DR. WADDICK: Mr. Erickson and Mr. Thienes, I suspect as you indicated your proposal is analogous to Mr. McMoore's from Minneapolis and in an adjunct faculty relationship with an institution such as the University, I suppose what you are proposing could be done.

MR. THIENES: Yes, except we are proposing that we use our own resources within our school district or within adjoining school districts.

DR. WADDICK: And what I am suggesting is that in an adjunct relationship with the University or an institution of higher education I think that that would be doable.

MR. THIENES: Ya, that we understand. I think it is the feeling of the Conference that -- that with the experienced people we have within our

districts that that is not necessary.

DR. WADDICK: Mr. Examiner, by the comment that is not necessary, you are suggesting the adjunct relationship to an institution of higher education?

MR. THIENES: That is true, sir.

EXAM. ERICKSON: Thank you. Roger Worner.

MR. WORNER: My name is Roger Worner, W-o-r-n-e-r, Assistant Superintendent, White Bear Lake Schools, address, 3375 Willow Avenue, White Bear Lake, Minnesota, 55110. I am pleased to have the opportunity to address the Hearing Examiner, members of the State Department of Education and the audience on behalf of the School Board and Administration of Independent School District Number 624.

I wish to convey that Independent School District Number 624 unanimously opposes the proposed rule as prepared. I would like to share with you a few perspectives if I could using your blackboard on a view of one school district from the trenches and I suspect, though I cannot confirm, the view of our school district from the trenches, the North Suburban School District, very much typifies school districts throughout the State of Minnesota as we currently exist and as we would be affected by the implementation of this proposed rule.

I ask to present this information by and large to address, if not refute, a couple of comments which I may have taken slightly out of context that were prepared or presented earlier. Namely, that through this rule we will not see a decline in extracurricular programming. To address the comment, we may not have a shortage or we may currently have a shortage, that we do not believe this rule will limit participation on the part of students. In fact our school district and our administrators and as far as I know the school districts in the surrounding areas in fact reject all of those assumptions based on present facts and figures in the local school districts, so if I may I will take this opportunity to share with you and the audience a few pieces of information.

EXAM. ERICKSON: Mr. Worner, if you are going to put this on the -- you have to say them verbally or else submit them to me on a written sheet because I am not going to take the blackboard with me when I leave.

MR. WORNER: Right. The first point I would like to make is that currently the school district employs 163 coaches. We anticipate next year we will employ 163 coaches. Of that 163, 110 are in district coaches. Obviously then 53 or approximately 1/3 are

out of district. Under current requirements we must have this year 12 coaches between our two high schools at the senior high school level who meet the requirements in the proposed rule or in other words 12 coaches that are required to have licensure, special licensure. Next year under the proposed rules with 11 boys programs and 11 girls programs in each of the two high schools we will have to have 40 coaches with required licensure. When we look at our staff this year, in all of those sports, the head coaching positions, to determine how many of them fulfill licensing requirements we have 23, which means approximately 50 percent of the current coaches that we have serving in head coaching capacities this year will not meet licensing standards next year. We anticipate vacancies at the present time, and we are posting them, from 80 coaching positions this past year, and I will not put this on the board. We were forced to cancel in our high schools two sports because of our inability to secure licensed coaches, a wrestling program and a gymnastics program.

It is our assumption that indeed the proposed rules will have a dramatic impact on our school district's athletic programs, our extracurricular programs. We expect the programs will be cancelled. We expect we will be unable to secure

coaches who meet the provisions of the proposed rule. We expect that -- it was quoted earlier a vast majority of the staffing problems will be eliminated by just requiring head coaches to be licensed. We do not believe that. We do not necessarily believe that the rule as proposed was better than nothing. So there are many, many provisions of the rule with which we concur and with which we are eager and willing to work. Many of the provisions of the rule, or at least a few of the provisions of the rule, we believe ought to be modified to allow school districts to bring present coaches and coaches that will need to be hired from the outside up to licensing standards.

I think earlier today in some of the testimony that was provided it was implied when one spoke in opposition to passage of the rule that local school districts do not believe in increasing the expertise, the talents, the background of their coaches. In fact virtually every school district does.

A few other points that I would like to make, perhaps they are not entirely relevant, but in listening to the proceedings earlier this morning, I think there were some interesting points that were made that were swept aside. A comment was made about or a question was raised to one of the gentlemen who

spoke about the fact that 60 hours -- would 60 hours or would a week and a half as proposed by some school districts be enough to increase the competencies of a coach to a point where the university official would feel happy or comfortable. The answer was no. The rule implies or proposes that staff members who are on board do indeed receive 60 hours of instruction if they are not licensed and be allowed to be licensed in future years. 60 hours is a week and a half and that happens to be one of the provisions with which our school district feels very favorable.

Another point that was made that we will not see a sudden decline in extracurricular programs. I think statewide we will. I do not believe that based on our track record, good salary schedule, with many fine opportunities for excellent programs we have been able to attract coaches in the past in the numbers that we needed them, and I cannot imagine that the imposition of this rule in its present form is going to cause more coaches to be interested in coaching to our school district and not cause some coaches who have served in our school district for many, many years not to consider dropping out of the coaching ranks. We have not formally surveyed our coaches, but have spoken to many of them and asked if in fact this

rule as stated without modification is adopted would they or would they not continue in the coaching ranks and we have received responses from many coaches, more than a dozen, that they would not stay in the coaching ranks if they were forced to go through the certification provisions as applied in certain passages of this rule.

We believe, as has already been stated, that to implement some of the training programs as suggested in the rule will be very costly. We are a district of declining enrollment, as most of the school districts in the state are. We were affected by budgetary revisions this past year. We have had a budgetary freeze on for seven months in our school district.

We are as a school district very excited about the prospect of either having someone else develop for us and provide to us training programs which we will carry out, either individually as a school district, through the ECSU, through the Minnesota State High School League or through a joint district cooperation. We believe that we have competent qualified staff members who are certified by the State Department of Education in physical education and health related areas, first aid, cardio pulmonary resuscitation and many, many other areas who would serve well in providing

training. We would also like to be able to select staff members who may be part of a professional team, college team of consultants, to bring them in and determine our own instructional programs or to follow guidelines established by the State Department of Education. We have no problems with the provision of training. We are pleased to provide the training. It is the matter of whether or not we must be forced to cooperate and meet the standards of a college or university in lieu of our preparation and dissemination of our own program. We believe we can provide these programs by ourselves or jointly with others. We believe that the number of credits required for coaches who may be outside of the school district who may not have permanent employment are excessive. We do believe that there are other agencies and other school districts that are amply willing to cooperate with us in carrying out such instructional programs and would be very very pleased if the State Department of Education would decide on the curriculum, disseminate it to the school districts, and give us guidance in the school districts.

EXAM. ERICKSON: Dr. Waddick.

DR. WADDICK: Dr. Worner, I think the essence of your testimony was depicted on the blackboard,

at least as far as I am personally concerned. You have indicated that you would be required next year to have some 4 --

MR. WORNER: 44.

DR. WADDICK: 44 licensed coaches?

MR. WORNER: Right.

DR. WADDICK: Of which 23 currently are licensed, leaving a deficit of 21 I would gather?

MR. WORNER: Right.

DR. WADDICK: Requiring licensure in order to be in conformity with the rule. Your comment indicated that it would be a burden or a hardship I thought I heard because you have to come into conformity with this if I understood you next year. Now the applicable implementation date of the rule is July 1, 1982, which would provide those individuals some 15 months by my computation in which to train up to licensability.

MR. WORNER: My point was not the timetable, the 15 months. My point is that in many instances we are hiring head coaches one week or one day prior to the beginning of the season, or two weeks after the beginning of the season. The problem is one of in-accessibility to coaches, the coaching turnover, as has been indicated by the gentleman from Minneapolis

and several others. These 80 vacancies will be posted now and 50 percent of those will not be filled for six, seven months. Where are we? We perceive it to be a significant problem. It has been for the four years I have been in the school district.

It is not a matter I want to emphasize of the school district being unwilling to design and implement programs of instruction. I think the 60 hour program as suggested there is a fine one. I think it is a very serious concern on our part, and I suspect several other school districts, about the cooperative design and dissemination of those programs.

We feel we have very qualified staff members and if we can't, we feel we can cooperate with Roseville, Moundsview, Stillwater, North St. Paul, Columbia Heights, several others, in designing adequate programs under the guidance of the State Department of Education. In fact we would welcome the development of the curriculum as I said earlier. It is the matter of the establishment of a cooperative relationship that may be held at a district site. It may be held at the University of Minnesota. If that is the case, we say you must go over for 60 hours of instruction to the State of Minnesota -- or the University of Minnesota, our staff members say we think we ought to be reimbursed

for that, or we don't think we want to go or we think that it is an unreasonable burden or will you provide the program inside of the school district. We think it is reasonable to offer that program under the guidance of the State Department in our local school district.

As far as the other issue is concerned, the 12 credit issue, or someone suggested 15 or 18 credits, clearly for people inside the school district who cannot be grandpersoned in, they will not accept that. They will not accept that, not for $1200 a year or $1600 a year or $2,000 a year. The vast majority of those people will drop out of the coaching ranks and many of those are people who have coached for us for a dozen or two dozen years. They will clearly drop out. In the case of people who are outside of the school district, we are kind of at the whim, with 80 people, who in the final analysis, with the 53 we hired, if those people come to us with certification, that's fine. If they do not come to us with certification, you know, maybe our school board and our Superintendent of Schools will request that we ask for the provisions of the -- the provisional certificate, which causes me to want to make one other comment.

We were talking earlier I think when the

gentleman from Fairmont was addressing this group about tort liability, about an individual who is outside in the community and not licensed as a teacher, and I don't want to get into that other than to make a point. We have had some contact with our legal firm asking them about our potential liability of hiring in the fall sports season a non-licensed coach who does not meet state certification standards, who within the first week or two after attending one class at the University of Minnesota or Macalaster, Gustavus, some place, after attending one class a freak accident occurs, are we any less liable for a provisionally certified coach, and if in fact we aren't any less, I know that it will be the recommendation of our School Board that we not request in any instance provisionally certified coaches.

EXAM. ERICKSON: Dr. Droubie, do you want to make a comment?

DR. DROUBIE: Mr. Worner, you made a comment about you have many coaches that have coached two dozen years and do not want to earn the 12 credits. It should be pointed out that the 12 credit requirement is a licensure requirement for new coaches. Those that have coached several dozen years or whatever in your school district will only be required to pick up the

60 hours minimal requirement or, you know, the first aid and the care and prevention of athletic injuries and I can't believe -- you indicate that they would be unwilling to refresh themselves.

MR. WORNER: I don't think they'd be unwilling to take the 60 hours.

DR. DROUBIE: You understand they do not need the 12 --

MR. WORNER: I misspoke there.

DR. DROUBIE: Okay, and may I ask you a question on the figures that you are using, just for my own clarification, when we are talking about those requiring licensure, you do understand that we are speaking only of head varsity coaches?

MR. WORNER: I fully understand that.

DR. DROUBIE: So your 163 includes all of your coaches, is that correct?

MR. WORNER: Absolutely. That's correct. The purpose of putting this up on the board is to indicate to you the influx of out of district coaches. I realize that this is the crux of the issue right here.

DR. DROUBIE: I want to make that clear, that your 163 is not pertinent to the rule that is being discussed.

MR. WORNER: Other than as it reflects the number of coaches that we are hiring from outside of the school district which has a bearing on the comment that we do not think that this rule should limit opportunities for students in the school districts.

EXAM. ERICKSON: Dr. Waddick.

DR. WADDICK: Mr. Examiner. My memory is very poor, Dr. Worner, did the White Bear Lake School District testify in connection with the previously proposed rule as advanced by the Board of Teaching?

MR. WORNER: I don't recall. I am not even sure of the date of that hearing.

DR. WADDICK: A couple of years ago. If you were familiar with that proposed rule and that hearing that rule would have dealt with the whole 163 coaches to whom Dr. Droubie was making reference. I think it is germane for us to reflect that we have retreated very substantially, and possibly to the disadvantage of some students in connection with the kind of protection that they might be expected to be assured, to the fairly minimal number that you have cited, of 44 of the 163, or roughly one-fourth, I believe, that would be of the entire group. I don't know, Mr. Worner -- Dr. Worner, what you would propose were you responsible for a licensure operation in the

State of Minnesota, but I am going to ask you the question. Would you license coaches or not?

MR. WORNER: Yes. Not in this fashion I would not.

DR. WADDICK: And you would license them for what reason?

MR. WORNER: For the purpose of affirming that they had certain background information, certain requisites prior to or at the time of delivering coaching services in the school district.

DR. WADDICK: And the consequence of those background experiences would hopefully result in what?

MR. WORNER: In the conduct of the athletic programs in a manner which would be safe and would be effective.

DR. WADDICK: Mr. Examiner and Dr. Worner, I think then you and we share the same objective.

MR. WORNER: The same objective.

DR. WADDICK: The conduct of programs which are appropriate, safe, fair, etc. It is our contention that the situations that you have cited are real. I don't believe anybody representing the State has suggested that there is no potential for reduction of programs, at least I don't think I have said that,

and I don't think anybody representing the State has indicated that there is no shortage of coaches, because we are aware through numerous correspondences that there is a shortage in varying dimensions. What I think we have asserted is in connection with the desire to provide opportunity there also is a counterpart responsibility to provide protection and we think that our proposal is a fairly modest proposal to provide a threshhold of that protection.

MR. WORNER: Only to summarize by saying I think that we have a two-fold purpose. All of us are interested in and concerned about increasing the standards of coaching. We are also interested in the operation of programs for boys and girls. My points are that we can achieve the first goal, the licensure and the instruction of staff members, in a form that is significantly modified from this one, but fulfills the intent of this rule and also that we can provide continuing programming service for students.

I guess I would leave you with the -- my thought that I think rather than a conservative impact on instructional programs, athletic programs in the state, this rule, if it is adopted as proposed, will have a significant impact both on the number of available coaches and on the programs that are offered

to students.

MS. FISHMAN: May I ask a couple of questions?

EXAM. ERICKSON: Ms. Fishman.

MS. FISHMAN: When you hire coaches in your school do you look -- do you look for athletic expertise in particular areas? I mean when you hire somebody to coach something, you look for areas of expertise?

MR. WORNER: Uh-huh.

MS. FISHMAN: So that if you are hiring someone to coach soccer, for instance, or swimming or whatever sport it is, you want that person to know something about the sport?

MR. WORNER: Uh-huh.

MS. FISHMAN: Would you also look for their awareness of certain areas like whether or not that person knows something about anatomy or athletic injuries or the way in which the body works?

MR. WORNER: We would. We do not always see that in staff members. In other words, there are many, many occasions where we are reduced to one applicant, one applicant who meets the teaching certification requirements, and in many instances we are drawing people from our own staff who have nominal athletic competencies.

MS. FISHMAN: So if you are looking for someone to coach a particular area, you may be forced at the present time at least to call upon someone to coach who may not have any expertise or any knowledge in some of these other areas besides the skill alone?

MR. WORNER: That's right.

MS. FISHMAN: Now in that case, it would certainly be better for the students and for the school district, I suppose for everybody concerned, if you could have a teacher -- or excuse me, if you could have a coach who had some expertise outside of just how to swim or just how to play soccer, knew something about athletics and physiology and things of that sort?

MR. WORNER: There is no doubt about it.

MS. FISHMAN: Now if there was a requirement that a coach would have to be licensed, a school district would have to follow suit and get someone who was prepared and had the expertise, and concerning the liability the school district might have, would you agree that a school district might have more liability if it hired a coach who knew nothing about for instance physiology, the body, how it works than if the school district hired someone who did know about these things?

MR. WORNER: I think the question is

predicated on whether or not the school district has the pool from which it can draw. The fact is there is not a pool, and most of the people I believe who are outside of the school district pool into which we are trying to draw will be dramatically limited by this rule and in many instances the people who are excluded by the rule will be people who are more qualified than the people who are included by the rule. That is the problem we are running into. It is not a --

MS. FISHMAN: But that is a problem that you run into always when you license. That is a problem that happens with licensed teachers in academic -- more academic areas as well, isn't it? Couldn't you argue that, for instance, a mathematician who worked with a corporation was perhaps as well qualified to teach math as someone who went through a university and had a teaching certificate in math?

MR. WORNER: I suspect you could probably argue that on either side of the question, yes.

MS. FISHMAN: All right, but if we go for a licensed mathematics teacher we feel somehow that we are making sure that there are certain minimum requirements that are met with that license?

MR. WORNER: Yes.

MS. FISHMAN: And that same reasoning then would follow with coaches, that at least we are making sure that we have certain minimal requirements?

MR. WORNER: There is no doubt about it, but the fact is that if the pool already exists out here with some people, and mind you an inadequate pool, and some people do not meet those standards, and some people will not meet those standards and there are not more flexible means of allowing that certification or that licensure to happen, all that we have done is taken a very heavy demand and placed it onto a very small supply and further reduced the supply, and the option that we will have it seems to me very clearly, our school district has felt this this past year, the last two years in fact, is to eliminate programs. I understand what you are saying and I agree with you, the issue of licensure, if we can find alternative ways, and I believe that we can, to achieve this end, I don't think there will be a school district that will object to it.

EXAM. ERICKSON: Okay, thank you. I think we have gone around in a circle on this a couple of times already.

MR. WORNER: Thank you.

EXAM. ERICKSON: Let's go off the record.

(Off-the-record discussion.)

EXAM. ERICKSON: Back on the record. Mr. Mach.

MR. MACH: I am Frank Mach, M-a-c-h, Director of Physical Education and Athletics for men and women at the College of St. Thomas.

Okay. I wrote a letter to the previous Hearing Examiner back in '79. I'm not sure if those are still in the stack or not, but I have been with this problem since making it the basis of my doctoral study back in '68 and '69, and subsequent being appointed to the original task force on this topic in what, '74 or '75? I don't recall for sure. I remember that Dr. Droubie didn't have a speck of gray in his hair at that time. It's been a while. I have seen a lot of time and problems pass with this. My concern was then and is now that there are two extreme pressures being brought. We have heard them all. I don't have to repeat them. We have the tremendous need for coaches and on the other hand a desire I think on the part of all of us, including those that have the need, to have qualified prepared coaches, and I want to say this that I don't believe tort liability, whatever angle we want to approach it from, I don't believe the certification or licensure

equates with qualification, and I think the licensure means little if we conduct ourselves improperly and are negligent.

I was really happy to hear two of the earlier comments, Dr. Amann and Judy Johnson, because back in those early days, well were the excesses that existed and sympathetic and empathetic with the concerns of those people who were saying, hey, these programs are excessive, I felt like a voice crying in the wilderness trying to say, hey, let's compromise, let's try to come to some sort of a reasonable solution to meet these two problems, these two extreme pressures from either end, and that solution basically was to have a program that would properly prepare, and I'm talking certainly pre-service now.

What happens at the in-service, I guess I didn't agree with some of the people that spoke earlier. I don't think that necessarily has to be affiliated with an institution of higher education. I think that there are people -- I know there are people very well qualified to prepare in-service, people who have already learned a great deal by the school of hard knocks and what I am trying to say is that we want to be sure that we minimize the errors of the trial and error process of coaching before

these people go out into the profession, and so our concern is with pre-service and I have time and time and time again had young people come into my office and say I want to get my coaching license today. We used to call it coaching certificate, but the first question always has to be, well, what is your major, and are you preparing to teach. Very, very often the answer was no, I am not. Oh, I didn't know I had to have a teaching certification to be a coach. These people are good people. They are people who are for the most part participating in athletics, which many of the people who go into a licensed program are not and have not and obviously never will. They are kids who want to be involved in coaching, recognize the limitations of the job market in teaching and I think should be given the opportunity to prepare in some other career field and at the same time get good and appropriate preparation in coaching, so that we can assure that we have met, as we have heard many times before, a reasonable standard of preparation.

Now I know that is not a popular position with a lot of agencies in education, and I understand why, but I think at some point we have to make some sort of a compromise between these two extreme demands and I was very happy to hear it coming from the coaching--

women's coaching or girls' coaching it's called in the high schools, that they agree with that position. I had never spoken to Judy Johnson about that, so I -- it's totally coming from two different areas without any preparation to the presentations. But I have been saying it for a long time and I am going to say it one more time, that I think we need to compromise. We need to have a solid enough program to prepare the coaches but not necessarily require them to be certified teachers, but I would require as Judy said earlier a baccalaureate degree. I think that gives the evidence of maturity. It doesn't mean we are going to pull a kid in off the street, give him a couple of courses and tell him he can go out and coach. I think that is -- there is certainly something to be learned about human relations in general, human skills through the four years of college education, and I submit that the vast majority of coaching failures is learning the area of human skills, not the area of athletic skills.

The second proposal I hesitate -- or the second problem I hesitate to bring up because it's been kicked around quite a bit, and that is the maximum credit requirements. All I can say, we just can't do it as institutions of higher learning. We just cannot

in the pre-service program meet the knowledge, skills and understandings as defined in the proposed legislation within this maximum cap level that's placed upon us. It just can't be done and we can create courses that touch on it lightly and the wording says principles of kinesiology, principles of anatomy and principles of physiology, and I guess my question would be which principles should we select out and put into this thing we call a coaching preparation course? That is I guess part of the reason for my compromise position. I would rather be in the position of being able to pre-service train the coaches as well as I might reasonably be expected to do prior to the time they go into the coaching profession and not -- again not with excesses, not with excessive credits, not try to build up our FTE or anything else, but merely trying to assure that the students whom these coaches go out to work with will have the benefit of somebody that understands them reasonably well, understands the sport reasonably well, and understands the procedures and standards of care essential to preserving their health and well being.

I'd like to mention just in conclusion here what we have as a course of preparation at St. Thomas at the present time, at least -- this does exclude the

history of the principles of physical education course which was the basic tent of the men's and still is of the men's program, but what we have in our catalog now is a program that we thought, since we had hoped the catalog would be essentially in tune with what we had heard being developed during the past six or seven years, and it is the one we are working with now, except we are still requiring the principles course, until this new program comes in, but we are talking about a 14 semester hour program, and here is the way it would break down. It'll just take about 30 seconds and I know you are all getting hungry, but basically our first course would be what we call principles of theory and techniques of athletic coaching. Now that requires 4 semester hours, enough credits to do the job well. Half of it is related to the administrative aspects of coaching, the kinds of things I was talking about, you know, working on the public relations aspect kinds of things that are peculiar to coaches that teachers don't have to worry about, and then a course in theory and techniques of specific sports which is a part of that particular course, okay. So there are coaching theory and athletic administration, sports administration, coaching administration, all combined in one. Then we have another four credit

course in human anatomy and physiology and I don't know how you can touch even any place close to adequately on human anatomy and physiology without requiring at least a semester of work in this area and this incidentally is not -- even as an applied lab science or applied lab course. We don't require the necessity to go into the biology labs. We want a good understanding of the various systems with which they will be working and the human body when they're going to be coaching, training athletes. We require a two credit course in kinesiology, a two credit course in athletic training techniques, and that's that care and prevention course we are talking about, and a two credit course in exercise physiology and finally the coaching practicum which we are simply tacking on as a no credit thing in order to keep the credits down as much as we possibly can, and I might say in the area of athletic training techniques or -- I must have amused somebody -- the area of athletic training and prevention and care of athletic injuries is best and most effective as a cap to some of this other scientific basic knowledge. You can take a first aid course from any Red Cross Chapter in the basic principles of first aid, but it really is very, very minimal with regard to preventing and caring for athletic injuries.

So I guess I will conclude by saying in summary those are my two major concerns. I think there ought to be some kind of a compromise position. I proposed that and I'd be willing to propose it in detail to the Commission, and secondly, that I am saying, and I think I am saying on behalf of every school representative I have talked to in the last two or three years, that we cannot do the kind of job that is being proposed in terms of knowledge, understandings and skills within a 12 quarter hour maximum.

EXAM. ERICKSON: Thank you. Dr. Droubie?

DR. DROUBIE: Dr. Mach, your proposal then comes down to a requirement of a baccalaureate degree in some field, not teaching, any field, right?

MR. MACH: Right.

DR. DROUBIE: And 14 minimum -- 14 semester hours of credit in a coaching program so we'd be licensing head varsity coaches with any type of baccalaureate degree that have completed a coaching program, period. Is that what your proposal boils down to?

MR. MACH: Ya, it does, except that I wouldn't -- it may not be the program we have right now because the program we have right now assumes that

there would be a teaching certification in addition to that.

DR. DROUBIE: So really then if we took your proposal and said that coaches need a baccalaureate degree, the credits conceivably could be a great deal higher than the 14 semester hours and I don't see how that is going to really alleviate any supply and demand problems that have been discussed.

MR. MACH: I am not -- I am not proposing -- I would not propose a great deal higher at all. I think that the concern that coaching is a part of education is a valid concern and I think obviously it is. There might be room for a course say in the education department or one that now exists in the -- say in the introduction to education or the case may be where the non-education trained person can at least get some orientation as to where athletics fits into the total education picture in the schools where they're going to work, but beyond that I would say significantly not much more is required, but I guess, you know, I wouldn't propose that has to be required. That can be for other people to look at.

EXAM. ERICKSON: Dr. Waddick.

DR. WADDICK: Mr. Mach, both you and Judy Johnson have proposed a possible alleviation of the

supply situation, and this is a very speculative kind of question that I am going to ask, but it is being suggested by both you and she, that the rule envision the opportunity for somebody who is not prepared to be a teacher but whom has the kind of preparation in coaching to become licensed, licensable and employable as a coach. Assuming there is a coaching shortage, and I think that is a valid assumption, what percentage of that shortage would you feel would be alleviated through this option?

MR. MACH: That is -- that is very speculative I will say, but I would say there might be in the event, first of all, with kids not knowing that there is this kind of restriction, and many do and many don't know the restriction, and for instance, they don't want to be a teacher, I'd say that still there would be a minimum of 12 to 15 kids a semester that I come across that want to know about the coaching license who are not in teacher training. I really don't -- I really don't know. I think if it were something that were made known to students in pre-service programs that this opportunity is available, that we would see enough of them going into it. See my concern there, what I'm saying, is people getting coaching licensure who really are getting it primarily

to get the job and they don't really have much of a background in -- participatory background or even a great interest background, and somebody alluded to the more qualified people not getting the job. I see the more qualified potential coaching students going out of that and just getting into the youth programs or whatever that they end up in. I would rather see them working within the school framework.

DR. WADDICK: Are you referring to the more qualified potential coaches or the more qualified athletes?

MR. MACH: Potential coaches, because they're interested, they're -- they have been involved in sports, so forth. I think that is a much better potential coach than someone who recognizes the fact that he can't get a job in social studies without getting a coaching licensure.

DR. WADDICK: The answer to my question then is athletes, not necessarily coaches?

MR. MACH: Well, I don't see it that way, but you can interpret it any way you wish.

DR. WADDICK: Well, it was, Mr. Examiner, a genuine question because Judy Johnson has raised this in another setting, and I suffer from the bias of many years ago of thinking about somebody matriculating

through St. Thomas and perhaps your business program with the expectation and ambition of going out and taking a job with IBM, CDC, somebody or other, and that would in my estimation have fairly explicitly excluded the likelihood that that person is going to show up at Washburn High School in South Minneapolis at 3:15 three, four afternoons a week to commence coaching the basketball or football squad or whatever squad. The world does not operate like that.

MR. MACH: I suppose it very well doesn't, but we also have people that go into sales, insurance, not totally self-employed but in programs or work lines that they have more flexibility to schedule than the 9 to 5 IBM man.

DR. WADDICK: Thank you for filling my curiosity.

EXAM. ERICKSON: Thank you. Ma'am.

MS. BLEIK: My name is Fran Bleik, and I am from St. Cloud. I am at the St. Cloud State University but the comment or two I will make will be my own personal reaction. B-l-e-i-k. One of the questions -- first question I guess I would like to direct to any of the representatives from the schools here, some of them have left, but I am thinking about White Bear Lake, Minneapolis or any public school system, I

guess I'd like to have someone give me some information in terms of the background of the head coaches in your institutions or your schools, maybe somebody from the public school system, are these people all physical education majors? Any of them physical education majors?

EXAM. ERICKSON: Let's go off the record.

(Off-the-record discussion.)

EXAM. ERICKSON: Back on the record. Ms. Bleik.

MS. BLEIK: If the head coaches are physical education majors I don't have much concern in terms of their ability to coach. The concern I do have is for the licensed teacher or person in other areas who may not have any of the background that the major student would have, and I guess I am looking at some of the experiences that we are having with students, and this supports some things that Dr. Mach and others have said, that students are utilizing the coaching licensure basically for job opportunities, and unfortunately that licensure appears to be more important than the -- actually the teaching certificate, but that's some of the things we are seeing.

And the other question I would like to direct would be to one of the representatives from the State Department of Education and what, if you do not

get any proposals from any of the colleges or universities for a licensure program, what would your next procedure be?

DR. DROUBIE: Well, Mr. Examiner, I really don't expect that to happen because I think that if the requirement stays at 12 credits, I think with some ingenuity that the training will take place, and it is a minimal requirement. I really do not foresee colleges not submitting programs to -- some may decide, as Mankato has indicated, that they're not willing to do it, but I don't expect that will -- that we'll have all 22 institutions refusing to submit programs or just saying they're unable to do it because it looks to me right now that a number of them are within a few --

MS.BLEIK: I would indicate that probably I would add St. Cloud State to the list of people, that it would be very doubtful if we would present a program to meet the 12 credits at this point. And I guess the other thing, based on what I heard today, I would tend probably to support the two public school people who have indicated that they would like to go an alternative route in terms of setting up their own program. To me this probably will be the quickest way that they're going to get the help that they need to get these coaches trained, whether it's adequate or

not, but based on the fact that I think there are a number of universities and colleges that do question being able to get the maximum credits down to 12, that the only way you're going to get support is to bring in individuals, maybe from those institutions, who might volunteer or work into a program where the school district sets it up.

EXAM. ERICKSON: For training, how many credits do you think are appropriate or semester hours?

MS. BLEIK: We are talking about at St. Cloud State a credit system, credit hour system, and based on the requirements that you people have set up we are talking about 27 credits, and we are also looking at the situation where we have a number of other programs that utilize the courses that we offer and based on economics again which has been pointed out, both sides, we would have a very difficult time setting up a second set of courses and I would classify them as watered down to handle the coaching licensure situation.

DR. WADDICK: Did I understand correctly, Ms. Bleik, that you indicated the minimum number of credits that you feel would accomplish the training at an appropriate level for a person to be licensed as a coach would be 27?

MS. BLEIK: We are looking at our -- looking

at your proposal and of the courses that we could offer that would take care of the requirements.

DR. WADDICK: I did understand you, the third time now, correctly, that the minimum number of credits that St. Cloud State would include for appropriate training experience would be 27 quarter hour credits?

MS. BLEIK: What we are looking at right now.

DR. WADDICK: What is your position at St. Cloud?

MS. BLEIK: I am Coordinator for Physical Education.

DR. WADDICK: When you indicate that St. Cloud State might choose not to offer a program, is that an official statement or --

MS. BLEIK: I told you a while ago that some of the reactions would be mine. At this point as I look at this we are talking about 27 credits and we have talked about this in the past, at staff meetings and so forth, how we can meet this particular requirement.

EXAM. ERICKSON: Dr. Droubie.

DR. DROUBIE: Mr. Examiner, this is a real critical issue. We are saying that the current

requirements now existing in many colleges is a contributing factor to the shortage of coaches. 27, 30, 35 is not uncommon, not an uncommon requirement, and it is contributing to the problem, and that is why we are saying that there ought to be a more reasonable number of credits. Maybe it isn't 12, but if it is too many more we are not going to have coaches and I think the point we should keep in mind is that we are talking about an entry level license. It is a license to begin practicing. It isn't -- it isn't intended to turn out someone that knows everything there is to know about children and coaching, and certainly people that complete the 12 credit program will go on in-service-wise, workshops, seminars, other courses to, you know, better prepare themselves. We are talking about what is minimally needed to protect children that are taking part in interscholastic sports at the varsity level and as that article pointed out that Dr. Waddick will submit as part of the testimony, the problem exists with the head coaches. If you will read the article, it indicates that the problem is more prevalent with head varsity coaches, not assistant coaches, not B Squad coaches and not junior high coaches, and we are talking about head varsity coaches needing a minimal entry level of preparation and I can't believe that --

that it has to be 30 -- at the 25, 30, 35 credit level, and I think that is the essential point that we are trying to make.

EXAM. ERICKSON: Needless to say everybody has their own opinion on that, and Ms. -- is it Bleik --

MS. BLEIK: Bleik.

EXAM. ERICKSON: -- Bleik has got hers. Anything further, Ms. Bleik?

MS. BLEIK: Well, I guess I would just reiterate the point that if we do develop other courses it means watering down the program we have at the present and from an economic standpoint we don't have the staff to do it and I would concur with the proposal that the public school systems have made.

EXAM. ERICKSON: Fine, thank you. Any further comments or questions? Ma'am, please state, spell your name and give your address.

MS. McINTYRE: Dorothy E. McIntyre, M-c-I-n-t-y-r-e. I represent the Minnesota State High School League, 2621 Fairoaks Avenue, Anoka.

Mr. Examiner, I was in the audience and I indicated earlier today that in representing our organization we had submitted a letter to you in support of the proposed rules, and I only want to make just a couple of comments after listening to the testimony

this morning.

Basically the Board of Directors of the Minnesota State High School League do support the rules that are proposed here today and we want to make that very clear. We think that they do address the realities of the program as best we can, and in this day and age, and I guess I am one of the older senior members of this study of certification when I participated back in 1970 and the very first proposal that would have set a separate standard for coaches of girls sports in lieu of the one that was existing at that time for coaches of boys sports, so to those of us who have come down this very long and arduous trail of certification we believe that these proposals which the State Department of Education has now developed, and every single one of them we have attacked at some point or another and said that they need a very realistic approach to it, and we think that the State Department in looking at each one as proposed here does reflect many of the concerns of the schools.

And that one of the key things that needs to be considered is at this point there is no certification for coaches of girls sports and the one that is in existence applies to only six boys sports and that one of our basic premises is that certification is

needed for the head varsity coaches in all sports. It may be impossible to meet everybody's needs today and it may not be possible to do something that is viewed as being perfect, but the premise we'll rest on is that certification is needed. If in time there is further evidence that the requirement of the coaches possessing teaching license continues to increase, we do hope that there may be some consideration given to that area. I am not today, however, prepared to say that the High School League will endorse the concept that would carte blanche include a non-teacher to be a head varsity coach, although we do think there are some considerations and that perhaps whether it be now or later that that may need to be very seriously considered.

As you know the League has no rule separate from the standards established by the State Department of Education for coaches. At one time it did, and it now has none, which means that the coaches in our member schools will meet only the requirements established by the State Department of Education.

I think one thing that seems to be a little bit unclear is that colleges and universities, while meeting the minimum standards, as I understand it, certainly have the option to extend the courses which

they offer and their requirements for a coaching minor or whatever program they require beyond that and I am sure that many individuals will make -- will take advantage of those opportunities, and that the nine credits are only the minimal to be passed on for approval by the State Department of Education.

So in that context without repeating what has been stated earlier by others, we support the concerns which they have, but more than that, that in addition to that, that we not hesitate any longer and that we do move forward with the certification program which can apply to all head varsity coaches and we do commend the State Department of Education, although we have in the past taken a stand, sometimes concern and sometimes opposition to many of the proposals, we think you have dealt with many of them very realistically and we will support the proposals with their basic concepts.

EXAM. ERICKSON: Any further comments or questions on the proposed rule? Okay, let me remind everyone that the record in this matter as we have previously determined will close then at the end of the working day on Thursday, April 9th. All comments must be to me by that time. Dr. Waddick, anything further?

DR. WADDICK: Mr. Examiner, before we

conclude, I would like to thank you as the presiding hearing officer for this hearing. We have enjoyed an informational atmosphere which I think has contributed to the Department's and the staff's and our legal counsel's better understanding of what the public itself is concerned about, and once again our appreciation.

EXAM. ERICKSON: Thank you. Okay, seeing -- let's go off the record.

(Off-the-record discussion.)

EXAM. ERICKSON: Because of some concerns expressed from the audience the record in this matter will remain open through the end of the working day on Monday, April 13th.

DR. WADDICK: And the identity of the person expressing the concern on behalf of the State University System is --

MR. CHINN: Jim Chinn, Assistant Vice Chancellor for Academic Affairs.

(Whereupon the hearing adjourned.)

REPORTER'S CERTIFICATE

I, Nancy J. Duehn, do hereby certify that I recorded in stenotypy the proceedings had in the foregoing matter on the 2nd day of April, 1981, at St. Paul, Minnesota, before Peter Erickson, Hearings Examiner;

I further certify that I thereafter transcribed into typewriting the foregoing transcript;

I further certify that said transcript of said hearing constitutes a full, true and correct transcript of the proceedings to the best of my ability.

Dated this 8th day of April, 1981.

Nancy J. Duehn

Nancy J. Duehn
6935 Empire Lane
Maple Grove, Minnesota 55369
Phone: (612) 425-1599

Our File No. 723

RULE REVIEW CHECKLIST

DATE RULE RECEIVED 8/25
DATE FOR REVIEW 9/8
DATE DUE 9/14

Adopted w/a hearing X
Adopted w/o a hearing
Temporary rule

Approved 9/14 Disapproved Returned to Agency

Resubmitted Due
Approved Disapproved Returned to Agency

Date filed w/Secretary of State 9/14 REVISOR APPROVED ✓

✓ Rule as Adopted

✓ Rule as Proposed

✓ Order Adopting 8.11.81

✓ Notice of Intent to Solicit Outside Opinion 8.11.80

✓ Order for rulemaking
4.2.81 Date of Hearing

✓ Certificate of Board's Authorizing Resolution

✓ Notice of rulemaking
✓ Sufficiency

✓ Affidavit of Mailing Notice of rulemaking
2.17.81 At least 30 days prior to hearing/~~adoption~~

✓ Mailing list Certificate

✓ Publication in State Register
2.23.81 At least 30/~~20~~ days prior to hearing/~~adoption~~

✓ Hearing Examiner's Report

✓ Chief Hearing Examiner's Report(s)
5.13.81 Approving H.E.'s Report
✓ 7.24.81 Approving agency action

✓ Agency's Findings of Fact

N/A LCRAR Report or agency Affidavit

✓ Certificate of Board's Resolution Adopting Rules

N/A Order Approving Incorporation by Reference

✓ Statement of Need and Reasonableness

N/A Petition for Adoption of a Rule

✓ Record (includes transcript or tape, exhibits, comments received by agency, requests for a hearing, and other relevant materials)

✓ Certificate of Compliance w/Rulemaking Procedures

✓ Affidavit of Mailing Notice of Submission to Attorney General

✓ Notice of Submission to the Attorney General

STATE OF MINNESOTA

DEPARTMENT ATTORNEY GENERAL

Office Memorandum

TO : HOWARD B. CASMEY
Commissioner, Department of Education

DATE: September 14, 1981

ATTN: Lois E. Steinhaus
Education Statistics Section

FROM : Ted A. Martinez
Special Assistant
Attorney General

PHONE: 296-0315

SUBJECT: In the Matter of the Proposed Adoption of Rules of the State Board of Education Governing Licensure of Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR § 1.0533

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. Please 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 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 to the rules in the approved set

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

TAM/cae

Enc.

cc: Kathy Burek
Duane Harves

Rule as Adopted

Chapter Twenty-Seven A: Licensure of Supervisory and Support Personnel; Issuance, Suspension, and Revocation

5 MCAR § 1.0533 Head varsity coaches of interscholastic sports in senior high schools.

A. Applicability. Every senior high school shall have a licensed head varsity coach for each interscholastic sport except as otherwise provided in C., below. Each person who is employed and functions as a head varsity coach of an interscholastic sport in a senior high school shall hold a valid Minnesota teaching license and shall satisfactorily complete a preparation program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches of interscholastic sports.

B. Definitions. For purposes of this rule, the following definitions shall apply:

1. Head varsity coach. The teacher who has the primary responsibility for a senior high school varsity interscholastic sport.

2. Interscholastic sports. A sport in which there is scheduled competition with athletic teams of another school within and outside the school district.

3. Senior high school. A secondary school consisting of grades 10-12 or grades 9-12 in a four-year secondary school and grades 9-12 in six-year secondary schools.

C. Scope. Nothing in this rule shall prohibit a school district from employing an unlicensed person as assistant to a licensed head varsity coach of an interscholastic sport or to coach a junior high school sport.

D. Qualifications for licensure. All candidates recommended for licensure as a head varsity coach of interscholastic sports shall have satisfactorily completed a program approved by the Minnesota Board of Education consisting of 12 to 18 quarter hours or the equivalent containing components designed to provide candidates recommended for licensure with knowledge, skills, and understandings in all of the following areas:

1. First aid and prevention and care of athletic injuries.

2. Science of sports, including principles of anatomy and kinesiology and principles of exercise physiology.

3. Theory and practice of sports techniques.

4. Psychology of sports and coaching.

5. Satisfactory completion of a supervised field experience in coaching consisting of no fewer than 40 clock hours.

E. Alternative route to licensure. A school district may contract with Minnesota colleges and universities which offer approved programs leading to the licensure of head varsity coaches to develop jointly the program of instruction outlined above. Such jointly developed programs must be approved by the Minnesota Board of Education. Recommendation of candidates for head varsity coaching licensure shall be the responsibility of the college or university through which the program was developed.

F. Teachers employed as head varsity, assistant, or junior high school coaches prior to July 1, 1982. A person holding a valid Minnesota teaching license who, prior to the effective date of this rule, is currently employed or was previously employed as a head varsity, assistant, or junior high school coach, as verified by the superintendent of schools of the school district employing the coach, and who can provide verification of completion of six quarter hours or 60 clock hours of instruction in first aid and the prevention and care of athletic injuries shall, upon application, be issued a license as head varsity coach of interscholastic sports.

G. Effective date. The provisions of this rule are effective on July 1, 1982, for applicants for the initial license as a head varsity coach of interscholastic sports.

H. School district hardship situations. In cases where a local school district is unable to employ a licensed head varsity coach of interscholastic sports, the superintendent of such school district may request the commissioner of education to grant a provisional license for one school year, renewable upon application on a year to year basis to a teacher or a baccalaureate degreed person to serve as a head varsity coach of an interscholastic sport upon evidence submitted by the superintendent of schools that the following conditions have been met:

1. Evidence that the school district is unable to employ a licensed head varsity coach of interscholastic sports for the current school year, and

2. The person to be employed under such authorization holds a current, valid Minnesota teaching license or a baccalaureate degree, and

3. The person to be employed under such authorization has experience in the sport and can demonstrate to the superintendent of schools that he/she has the fundamental knowledge and skills necessary for coaching the sport, and

4. Verification of completion of six quarter hours or 60 clock hours of instruction in first aid and the care and prevention of athletic injuries.

I. Licenses as head varsity coaches shall be renewed according to provisions of 5 MCAR § 3.005 continuing education/relicensure.

APPROVED AS TO LEGALITY

August 14 19 81

WARREN SPANNAUS, ATTORNEY GENERAL

BY Ted A. Mondale

SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
SEP 14 1981
Joan Anderson Growe
Secretary of State
2:45 p.m.

State Board of Education
Department of Education
Special Services Division

Order Adopting
Rules

In the Matter of the Proposed
Adoption of Rules of the State Board
of Education Governing Licensure of
Head Varsity Coaches of Interscholastic
Sports in Senior High Schools
5 MCAR § 1.0533

The above-entitled matter came on for hearing before Hearing Examiner Peter C. Erickson on April 2, 1981, at 9:00 a.m. in Conference Room D of the fifth floor of the Veterans Service Building in the City of St. Paul, Minnesota. After proper notice required by Minnesota Statutes Section 15.0412 was served upon all persons, associations, and other interested groups registered with the Secretary of State and upon those who filed with the Department of Education for that purpose.

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

NOW, THEREFORE, IT IS ORDERED that this rule identified as licensure requirements of head varsity coaches of interscholastic sports in senior high schools is adopted this 11th day of August, 1981, pursuant to authority vested in the State Board of Education by Minnesota Statute § 125.05, as amended by Laws of 1980, Chapter 345, S. 2.

State of Minnesota

Secretary, State Board of Education

Member, State Board of Education

ADMIN 1000 (Rev. 1/78)
SF-00006-01

STATE OF MINNESOTA

Office Memorandum

DEPARTMENT Education
736 Capitol Square Bldg.

TO : Special Ass't. Attorney General
G25 Administration Building

DATE: August 20, 1981

FROM : Lois E. Steinhaus L.E.S.
Education Statistics Section

PHONE: 6-4428

SUBJECT: Approval for Rules Governing Head Varsity Coaches of Interscholastic Sports 5 MCAR S 1.0533
Rules With Hearing - EDU 81-002-PE

Enclosed is the complete record of the Hearing.

Also enclosed are four copies of the Rules as Adopted (one copy showing changes from the proposed rule to the adopted rule) and two copies of the Order Adopting Rules. In addition, is a copy of each of the following:

1. Certificate of Board's Resolution Adopting Rules
2. Notice of Intent to Solicit Outside Opinion and any written material received - none
3. Order for Hearing
4. Certificate of Board's Authorizing Resolution
5. Notice of Hearing
6. Affidavit of Mailing
   Affidavit of the Notice....Rulemaking Mailing List
   Affidavit of the Additional Notice....Rulemaking Mailing List
   Certificate
7. Rules as Proposed
8. Hearing Examiner's Report
9. Chief Hearing Examiner's Reports
10. Findings of Fact and Conclusions
11. Statement of Need and Reasonableness
12. Affidavit of Mailing Notice of Submission to the Attorney General and accompanying Notice

PRINTED ON RECYCLED PAPER

State of Minnesota
Department of Education

State Board of Education
Special Services Division

IN THE MATTER OF: The Proposed Adoption of a Rule of the State Board of Education Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools
5 MCAR § 1.0533

Order for Hearing

IT IS HEREBY ORDERED THIS 12th day of January, 1981, that a public hearing on the proposed rule captioned above be held in the Veterans Service Building, Room D, 20 West 12th Street and Columbus Avenue, St. Paul, Minnesota 55155 on April 2, 1981, commencing at 9:00 a.m. and continuing until all representatives of associations or 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 persons who have registered their names with the State Board of Education for that purpose and be published in the State Register.

State of Minnesota
Board of Education

Secretary

CERTIFICATE OF BOARD'S
AUTHORIZING RESOLUTION

I, Howard B. Casmey, do hereby certify that I am secretary of the Board of Education, 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 of Education duly and properly called and held on the 12th day of January, 1981; that a quorum was present at said meeting; and 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 the Board of Education shall call a hearing for the purpose of informing the public concerning the proposed rule of the Board governing the licensure requirements for head varsity coaches of interscholastic sports in senior high schools; and that the commissioner or his deputy is authorized to sign an order and notice of such hearing to be conducted pursuant to Minnesota Statutes, chapter 15 and rules of the Office of Administrative Hearings.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 12th day of January, 1981.

Howard B. Casmey
Secretary, Board of Education

Elroy O. Johnson
Member, Board of Education

State Board of Education
Department of Education
Special Services Division

In the Matter of Proposed Adoption
of a Rule of the State Board of
Education Governing Licensure
Requirements for Head Varsity
Coaches of Interscholastic Sports
in Senior High Schools 5 MCAR § 1.0533

Notice of Hearing

A public hearing concerning the proposed rule will be held at Veterans Service Building, Room D, 20 West 12th Street and Columbus Avenue, St. Paul, Minnesota 55155 on April 2, 1981, commencing at 9:00 a.m. The proposed rule may be modified as a result of the hearing process. Therefore, if you are affected in any manner by the proposed rule, you are urged to participate in the rule hearing process.

Following the agency's presentation at the hearing all interested or affected persons will have an opportunity to ask questions and make comments. Statements may be made orally and written material may be submitted. In addition, whether or not an appearance is made at the hearing, written statements or material may be submitted to Peter Erickson, Hearing Examiner, Room 300, 1745 University Avenue, St. Paul, MN 55104, telephone (612) 296-8118 either before the hearing or within five working days after the close of the hearing. The hearing examiner may, at the hearing, order that the record be kept open for a longer period not to exceed 20 calendar days. The rule hearing procedure is governed by Minn. Stat. §§ 15.0411-15.0417 and 15.052, and by 9 MCAR §§ 2.101-2.113 (Minnesota Code of Agency Rules). If you have any questions about the procedure, call or write the hearing examiner.

Notice is hereby given that 25 days prior to the hearing, a Statement of Need and Reasonableness will be available for review at the agency and at the Office of Administrative Hearings. This Statement of Need and Reasonableness will include a summary of all the evidence and argument which the agency anticipates presenting at the hearing justifying both the need for and the reasonableness of the proposed rule or rules. Copies of the Statement of Need and Reasonableness may be obtained from the Office of Administrative Hearings at a minimal charge.

The Board's statutory authority to promulgate the proposed rules is provided by Minn. Stat. § 125.05, as amended by Laws of 1980, ch. 345, § 2.

The Board estimates that there will be no cost to local bodies in the State to implement the rule for the two years immediately following its adoption within the meaning of Minn. Stat. § 15.0412, subd. 7 (1978).

A copy of the proposed rules is attached hereto. One free copy may be obtained by writing to George B. Droubie, Capitol Square Building, 550 Cedar Street, St. Paul, MN 55101. Additional copies will be available at the door on the date of the hearing. If you have any questions on the content of the proposed rule, contact George B. Droubie.

Notice: Any person may request notification of the date on which the Hearing Examiner's Report will be available, after which date the Board may not take any final action on the rules for a period of five 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. If you desire to be so 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 Hearing Examiner's Report, or to the Board, in the case of the Board's submission or resubmission to the Attorney General.

Minn. Stat. ch. 10A requires each lobbyist to register with the State Ethical Practices Board within five days after he or she commences lobbying. A lobbyist is defined in Minn. Stat. § 10A.01, subd. 11 (1979 Supp.) 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 one month or more than $250, not including his own 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 his own 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.

The statute provides certain exceptions. Questions should be directed to the Ethical Practices Board, 41 State Office Building, St. Paul, MN 55155, telephone (612) 296-5615.

State of Minnesota
State Board of Education

Howard B. Casmey, Secretary

Date: January 12, 1981

State of Minnesota
Department of Education

State Board of Education
Special Services Division

IN THE MATTER OF: The Proposed Adoption of Rules of the State Board of Education Governing the Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR § 1.0533

Affidavit of Mailing

Harold Klecker, being first duly sworn, deposes and says:

That on the 17 day of February, 1981, at the City of St. Paul County of Ramsey, State of Minnesota, he served the attached Notice of Hearing, by depositing in the State of Minnesota Central Mail System (or) in the United States mail at said City of St. Paul, a copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached Affidavits of the Notice of the State Board of Education Rulemaking Mailing List and Additional Notice of the State Board of Education Mailing List.

Harold E Klecker

Subscribed and sworn to before me
this 17th day of February
1981.

Betty L. King
Notary Public

BETTY L. KING
Notary Public, Dakota Co. MN
My Commission Expires
June 13, 1983

State of Minnesota
Department of Education

State Board of Education
Special Services Division

IN THE MATTER OF: The Proposed Adoption of Rules of the State Board of Education Governing the Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR § 1.0533

Affidavit of the Notice of the State Board of Education Rulemaking Mailing List

I hereby certify that the attached 37 sheets constitute the accurate and complete list of persons, associations, and other interested groups who as of 8:00 o'clock A .M. this 17 day of February, 1981, have requested pursuant to Minn. Stat. § 15.0412, subd. 4, that their names be placed on file with the Minnesota Department of Education for the purpose of receiving Notice of the Proposed Adoption of Rules on the subject captioned above.

State Board of Education

By Howard B. Casmey, Secretary

Subscribed and sworn to before me
this 18 day of February,
1981.

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

Luana Vadnais
Notary Public

Ramsey County, Minnesota

My Commission expires June 16, 1984.

State of Minnesota
Department of Education

State Board of Education
Special Services Division

IN THE MATTER OF: The Proposed Adoption of Rules of the State Board of Education Governing the Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR § 1.0533

Affidavit of Additional Notice of the State Board of Education Mailing List

I hereby certify that included in the attached 37 sheets are persons on the Education Statistics memo series mailing list which includes school superintendents, directors of AVTIs, ECSUs, vocational centers, joint power districts and other interested persons, who pursuant to Minn. Stat. § 15.0412, subd. 4, receive Notice of the Proposed Adoption of Rules on the subject captioned above. This notice was in addition to that required for persons on the State Board of Education rulemaking mailing list of persons who have specifically requested notice of rulemaking proceedings.

State Board of Education

Howard B. Casmey, Secretary

Subscribed and sworn to before me this 18 day of February, 1981.

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

Luana Vadnais
Notary Public

Ramsey County, Minnesota

SUPERINTENDENT

MINNEAPOLIS
SPECIAL SCH DIST 0000
807 NE. BROADWAY
MINNEAPOLIS MINN
55413

SUPERINTENDENT

EDINA
INDEP SCH DISTRICT 0273
5555 W. 70TH ST.
EDINA MINN
55435

SUPERINTENDENT

OSSEO
INDEP SCH DISTRICT 0279
317 2ND AVE NW.
OSSEO MINN
55369

SUPERINTENDENT

ST. LOUIS PARK
INDEP SCH DISTRICT 0283
6425 W. 33RD ST.
ST. LOUIS PARK MINN
55426

SUPERINTENDENT

MOUNDS VIEW
INDEP SCH DISTRICT 0621
2959 HAMLINE AVE. N.
ROSEVILLE MINN
55113

SUPERINTENDENT

ST. PAUL
INDEP SCH DISTRICT 0625
360 COLBORNE ST.
ST. PAUL MINN
55102

SUPERINTENDENT

BIWABIK
INDEP SCH DISTRICT 0693
BOX 669
BIWABIK MINN
55708

SUPERINTENDENT

EVELETH
INDEP SCH DISTRICT 0697
801 JONES ST.
EVELETH MINN
55734

SUPERINTENDENT

HIBBING
INDEP SCH DISTRICT 0701
8TH AVE. E. & 21ST ST.
HIBBING MINN
55746

SUPERINTENDENT

NETT LAKE
INDEP SCH DISTRICT 0707

NETT LAKE MINN
55772

SUPERINTENDENT

HOPKINS
INDEP SCH DISTRICT 0270
1001 STATE HWY. 7
HOPKINS MINN
55343

SUPERINTENDENT

MINNETONKA
INDEP SCH DISTRICT 0276
261 SCHOOL AVE.
EXCELSIOR MINN
55331

SUPERINTENDENT

RICHFIELD
INDEP SCH DISTRICT 0280
7001 HARRIET AVE. S.
RICHFIELD MINN
55423

SUPERINTENDENT

WAYZATA
INDEP SCH DISTRICT 0284
210 D HWY. 101 N.
WAYZATA MINN
55391

SUPERINTENDENT

NORTH ST. PAUL-MAPLEWOOD
INDEP SCH DISTRICT 0622
2055 E. LARPENTEUR AVE.
MAPLEWOOD MINN
55109

SUPERINTENDENT

METROPOLITAN ECSU
INDEP SCH DISTRICT 0920
360 COLBORNE
ST. PAUL MINN
55102

SUPERINTENDENT

BUHL
INDEP SCH DISTRICT 0694
BOX 710
BUHL MINN
55713

SUPERINTENDENT

FLOODWOOD
INDEP SCH DISTRICT 0698
BOX 287
FLOODWOOD MINN
55736

SUPERINTENDENT

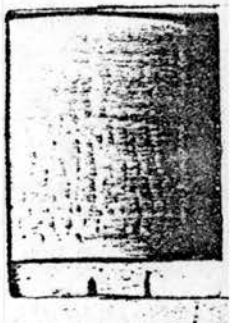
MOUNTAIN IRON
INDEP SCH DISTRICT 0703

MOUNTAIN IRON MINN
55768

SUPERINTENDENT

TOWER-SOUDAN
INDEP SCH DISTRICT 0708

TOWER MINN
55790





SUPERINTENDENT

BLOOMINGTON
INDEP SCH DISTRICT 0271
8025 PENN AVE. S.
BLOOMINGTON MINN
55431

SUPERINTENDENT

CHESTONKA
INDEP SCH DISTRICT 0277
600 LYNWOOD BLVD.
EXCELSIOR MINN
55364

SUPERINTENDENT

ROBBINSDALE
INDEP SCH DISTRICT 0281
4148 WINNETKA AVE. N.
NEW HOPE MINN
55427

SUPERINTENDENT

BROOKLYN CENTER
INDEP SCH DISTRICT 0286
6500 HUMBOLDT AVE. N.
BROOKLYN CENTER MINN
55430

SUPERINTENDENT

ROSEVILLE
INDEP SCH DISTRICT 0623
1251 W. COUNTY ROAD B-2
ROSEVILLE MINN
55113

SUPERINTENDENT

AURORA-HOYT LAKES
INDEP SCH DISTRICT 0691
501 N. 1ST ST. W.
AURORA MINN
55705

SUPERINTENDENT

CHISHOLM
INDEP SCH DISTRICT 0695
3RD AVE. SW. & 3RD ST.
CHISHOLM MINN
55719

SUPERINTENDENT

GILBERT
INDEP SCH DISTRICT 0699
GILBERT MINN
55741

SUPERINTENDENT

PROCTOR
INDEP SCH DISTRICT 0704
201 1ST AVE. N.
PROCTOR MINN
55810

SUPERINTENDENT

DULUTH
INDEP SCH DISTRICT 0709
LAKE AVE. & 2ND ST.
DULUTH MINN
55802

SUPERINTENDENT

EDEN PRAIRIE
INDEP SCH DISTRICT 0272
8025 SCHOOL ROAD
EDEN PRAIRIE MINN
55343

SUPERINTENDENT

ORONO
INDEP SCH DISTRICT 0278
685 OLD CRYSTAL BAY RD N
LONG LAKE MINN
55356

SUPERINTENDENT

ST. ANTHONY VILLAGE
INDEP SCH DISTRICT 0282
3303 33RD AVE. NE.
ST. ANTHONY VILLAGE MINN
55418

SUPERINTENDENT

SUBURAN HENN. CO. AVTI
INDEP SCH DISTRICT 0287
1820 N. XENIUM LANE
PLYMOUTH MINN
55441

SUPERINTENDENT

WHITE BEAR LAKE
INDEP SCH DISTRICT 0624
3375 WILLOW AVE.
WHITE BEAR LAKE MINN
55110

SUPERINTENDENT

BABBITT
INDEP SCH DISTRICT 0692
SOUTH DRIVE
BABBITT MINN
55706

SUPERINTENDENT

ELY
INDEP SCH DISTRICT 0696
600 E. HARVEY ST.
ELY MINN
55731

SUPERINTENDENT

HERMANTOWN
INDEP SCH DISTRICT 0700
4190 UGSTAD ROAD
DULUTH MINN
55811

SUPERINTENDENT

VIRGINIA
INDEP SCH DISTRICT 0706
TECHNICAL BUILDING
VIRGINIA MINN
55792

SUPERINTENDENT

ST. LOUIS COUNTY
INDEP SCH DISTRICT 0710
731 3RD ST. S.
VIRGINIA MINN
55792

SUPERINTENDENT

NORTHEAST ECSU
INDEP SCH DISTRICT 0002
HALL OF FAME, BOX 657
EVELETH MINN
55734

SUPERINTENDENT

ANOKA
INDEP SCH DISTRICT 0011
11299 HANSON BLVD. NW.
COON RAPIDS MINN
55433

SUPERINTENDENT

ST. FRANCIS
INDEP SCH DISTRICT 0015
BOX 128
ST. FRANCIS MINN
55070

SUPERINTENDENT

FRAZEE-VERGAS
INDEP SCH DISTRICT 0023
BOX 186
FRAZEE MINN
56544

SUPERINTENDENT

BLACKDUCK
INDEP SCH DISTRICT 0032

BLACKDUCK MINN
56630

SUPERINTENDENT

FOLEY
INDEP SCH DISTRICT 0051
520 DEWEY ST.
FOLEY MINN
56329

SUPERINTENDENT

ORTONVILLE
INDEP SCH DISTRICT 0062
200 6TH ST. NW., BOX 247
ORTONVILLE MINN
56278

SUPERINTENDENT

MANKATO
INDEP SCH DISTRICT 0077
51 PARK LANE
MANKATO MINN
56001

SUPERINTENDENT

COMFREY
INDEP SCH DISTRICT 0081
BOX 68
COMFREY MINN
56019

SUPERINTENDENT

BARNUM
INDEP SCH DISTRICT 0091
BOX 227
BARNUM MINN
55707

SUPERINTENDENT

AITKIN
INDEP SCH DISTRICT 0001
306 SECOND ST. NW.
AITKIN MINN
56431

SUPERINTENDENT

CENTENNIAL
INDEP SCH DISTRICT 0012
NORTH ROAD & LEVER ST.
CIRCLE PINES MINN
55014

SUPERINTENDENT

SPRING LAKE PARK
INDEP SCH DISTRICT 0016
8000 HWY. 65 NE.
SPRING LAKE PARK MINN
55432

SUPERINTENDENT

LAKE PARK
INDEP SCH DISTRICT 0024
BOX 357
LAKE PARK MINN
56554

SUPERINTENDENT

KELLIHER
INDEP SCH DISTRICT 0036
BOX 147
KELLIHER MINN
56650

SUPERINTENDENT

BEARDSLEY
INDEP SCH DISTRICT 0057

BEARDSLEY MINN
56211

SUPERINTENDENT

LAKE CRYSTAL
INDEP SCH DISTRICT 0070
BOX F
LAKE CRYSTAL MINN
56055

SUPERINTENDENT

GARDEN CITY
INDEP SCH DISTRICT 0078

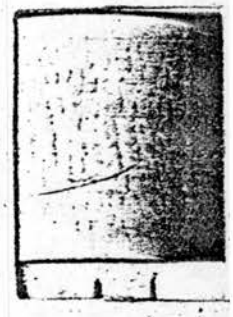
GARDEN CITY MINN
56034

SUPERINTENDENT

SLEEPY EYE
INDEP SCH DISTRICT 0084
400 4TH AVE. SW.
SLEEPY EYE MINN
56085

SUPERINTENDENT

CARLTON
INDEP SCH DISTRICT 0093
BOX 310
CARLTON MINN
55718





UPERINTENDENT

ILL CITY
NDEP SCH DISTRICT 0002
CX 69
ILL CITY MINN
5748

UPERINTENDENT

OLUMBIA HEIGHTS
NDEP SCH DISTRICT 0013
400 49TH AVE. NE.
OLUMBIA HEIGHTS MINN
5421

UPERINTENDENT

UDUBON
NDEP SCH DISTRICT 0021
CX 38
UDUBON MINN
6511

UPERINTENDENT

INE PCINT
NDEP SCH DISTRICT 0025
CX 61
CNSFORD MINN
6575

UPERINTENDENT

EDLAKE
NDEP SCH DISTRICT 0038

EDLAKE MINN
6671

UPERINTENDENT

LINTON
NDEP SCH DISTRICT 0058
CX 361
LINTON MINN
6225

UPERINTENDENT

APLETON
NDEP SCH DISTRICT 0072
01 6TH AVE. NE, BOX 365
APLETON MINN
6065

UPERINTENDENT

MBOY-GOODTHUNDER
NDEP SCH DISTRICT 0079

MBOY MINN
6010

UPERINTENDENT

PRINGFIELD
NDEP SCH DISTRICT 0085
CX 145
PRINGFIELD MINN
6087

UPERINTENDENT

LOQUET
NDEP SCH DISTRICT 0094
09 CARLTON AVE.
LOQUET MINN
5720

SUPERINTENDENT

MC GREGOR
INDEP SCH DISTRICT 0004
MAIN ST.
MC GREGOR MINN
55760

SUPERINTENDENT

FRIDLEY
INDEP SCH DISTRICT 0014
6000 W. MOORE LK. DR.
FRIDLEY MINN
55432

SUPERINTENDENT

DETROIT LAKES
INDEP SCH DISTRICT 0022
702 LAKE AVE.
DETROIT LAKES MINN
56501

SUPERINTENDENT

BEMIDJI
INDEP SCH DISTRICT 0031
15TH ST. & BELTRAMI AVE.
BEMIDJI MINN
56601

SUPERINTENDENT

SAUK RAPIDS
INDEP SCH DISTRICT 0047
901 1ST ST. S.
SAUK RAPIDS MINN
56379

SUPERINTENDENT

GRACEVILLE
INDEP SCH DISTRICT 0060
BOX 398
GRACEVILLE MINN
56240

SUPERINTENDENT

ST. CLAIR
INDEP SCH DISTRICT 0075

ST. CLAIR MINN
56080

SUPERINTENDENT

SOUTH CENTRAL ECSU
INDEP SCH DISTRICT 0922
218 OLD MAIN, BOX 9
MANKATO MINN
56001

SUPERINTENDENT

NEW ULM-HANSKA
INDEP SCH DISTRICT 0088
412 N. MINNESOTA
NEW ULM MINN
56073

SUPERINTENDENT

CROMWELL
INDEP SCH DISTRICT 0095

CROMWELL MINN
55726





SUPERINTENDENT

MOOSE LAKE
INDEP SCH DISTRICT 0097
413 BIRCH AVE.
MOOSE LAKE MINN
55767

SUPERINTENDENT

WACONIA
INDEP SCH DISTRICT 0110
24 S. WALNUT ST.
WACONIA MINN
55387

SUPERINTENDENT

CASS LAKE
INDEP SCH DISTRICT 0115
BOX 187
CASS LAKE MINN
56633

SUPERINTENDENT

WALKER-HACKENSACK
INDEP SCH DISTRICT 0119

WALKER MINN
56484

SUPERINTENDENT

MONTEVIDEO
INDEP SCH DISTRICT 0129
3RD & EUREKA
MONTEVIDEO MINN
56265

SUPERINTENDENT

CHISAGO LAKES
INDEP SCH DISTRICT 0141

LINDSTROM MINN
55045

SUPERINTENDENT

DILWORTH
INDEP SCH DISTRICT 0147
BOX 188
DILWORTH MINN
56529

SUPERINTENDENT

GONVICK-TRAIL
INDEP SCH DISTRICT 0158

GONVICK MINN
56644

SUPERINTENDENT

MOUNTAIN LAKE
INDEP SCH DISTRICT 0173
450 12TH ST.
MOUNTAIN LAKE MINN
56159

SUPERINTENDENT

BRAINERD
INDEP SCH DISTRICT 0181
300 QUINCE ST.
BRAINERD MINN
56401

SUPERINTENDENT

ESKO
INDEP SCH DISTRICT 0099

ESKO MINN
55733

SUPERINTENDENT

WATERTOWN-MAYER
INDEP SCH DISTRICT 0111
BOX 368
WATERTOWN MINN
55388

SUPERINTENDENT

PILLAGER
INDEP SCH DISTRICT 0116
BOX 38
PILLAGER MINN
56473

SUPERINTENDENT

CLARA CITY
INDEP SCH DISTRICT 0126
BOX 590
CLARA CITY MINN
56222

SUPERINTENDENT

NORTH BRANCH
INDEP SCH DISTRICT 0138
320 MAIN ST.
NORTH BRANCH MINN
55056

SUPERINTENDENT

FRANCONIA
COMMON SCH DISTRICT 0323

SHAFER MINN
55074

SUPERINTENDENT

HAWLEY
INDEP SCH DISTRICT 0150
BOX 608
HAWLEY MINN
56549

SUPERINTENDENT

CLEARBROOK
INDEP SCH DISTRICT 0161

CLEARBROOK MINN
56634

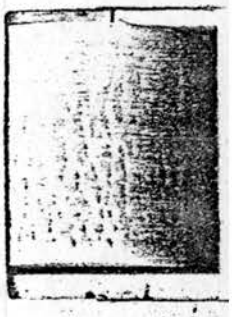
SUPERINTENDENT

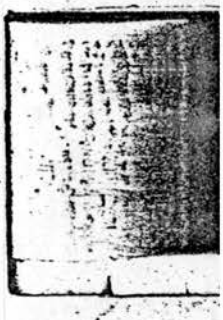
WESTBROOK
INDEP SCH DISTRICT 0175
BOX 128
WESTBROOK MINN
56183

SUPERINTENDENT

CROSBY-IRONTON
INDEP SCH DISTRICT 0182

CROSBY MINN
56441





UPERINTENDENT

RENSHALL
NDEP SCH DISTRICT 0100
CX 68
RENSHALL MINN
5797

UPERINTENDENT

HASKA
NDEP SCH DISTRICT 0112
700 CHESTNUT
HASKA MINN
5318

UPERINTENDENT

INE RIVER
NDEP SCH DISTRICT 0117
INE RIVER MINN
6474

UPERINTENDENT

AYNARD
NDEP SCH DISTRICT 0127
CX 276
AYNARD MINN
6260

UPERINTENDENT

USH CITY
NDEP SCH DISTRICT 0139
USH CITY MINN
5069

UPERINTENDENT

LYNDON-FELTON
NDEP SCH DISTRICT 0145
LYNDON MINN
6547

UPERINTENDENT

CCRHEAD
NDEP SCH DISTRICT 0152
10 4TH AVE. S.
CCRHEAD MINN
6560

UPERINTENDENT

AGLEY
NDEP SCH DISTRICT 0162
08 N. BAGLEY AVE.
AGLEY MINN
6621

UPERINTENDENT

INDOM
NDEP SCH DISTRICT 0177
CX C-177
INDOM MINN
6101

UPERINTENDENT

EQUOT LAKES
NDEP SCH DISTRICT 0186
CX 368
EQUOT LAKES MINN
6472

SUPERINTENDENT

[redacted]WOOD-YOUNG AMERICA
INDEP SCH DISTRICT 0108
NORWOOD MINN
55368

SUPERINTENDENT

BACKUS
INDEP SCH DISTRICT 0114
BACKUS MINN
56435

SUPERINTENDENT

REMER
INDEP SCH DISTRICT 0118
BOX 37
REMER MINN
56672

SUPERINTENDENT

MILAN
INDEP SCH DISTRICT 0128
BOX 180
MILAN MINN
56262

SUPERINTENDENT

TAYLORS FALLS
INDEP SCH DISTRICT 0140
TAYLORS FALLS MINN
55084

SUPERINTENDENT

BARNESVILLE
INDEP SCH DISTRICT 0146
BOX 188
BARNESVILLE MINN
56514

SUPERINTENDENT

ULEN-HITTERDAL
INDEP SCH DISTRICT 0914
ULEN MINN
56585

SUPERINTENDENT

COOK COUNTY
INDEP SCH DISTRICT 0166
BOX F
GRAND MARAIS MINN
55604

SUPERINTENDENT

STORDEN-JEFFERS
INDEP SCH DISTRICT 0178
BOX 68
STORDEN MINN
56174

SUPERINTENDENT

SOUTH ST. PAUL
SPECIAL SCH DIST 0006
700 N. SECOND ST.
SOUTH ST. PAUL MINN
55075





SUPERINTENDENT

BURNSVILLE
INDEP SCH DISTRICT 0191
100 RIVER RIDGE COURT
BURNSVILLE MINN
55337

SUPERINTENDENT

ROSEMOUNT
INDEP SCH DISTRICT 0196
14445 DIAMOND PATH W.
ROSEMOUNT MINN
55068

SUPERINTENDENT

DAKOTA COUNTY AVTI
INDEP SCH DISTRICT 0917
145TH ST. E. & AKRON RD.
ROSEMOUNT MINN
55068

SUPERINTENDENT

KASSON-MANTORVILLE
INDEP SCH DISTRICT 0204

KASSON MINN
55944

SUPERINTENDENT

EVANSVILLE
INDEP SCH DISTRICT 0208

EVANSVILLE MINN
56326

SUPERINTENDENT

DELAVAN
INDEP SCH DISTRICT 0218
BOX 125
DELAVAN MINN
56023

SUPERINTENDENT

WELLS
INDEP SCH DISTRICT 0224
250 2ND AVE. SW.
WELLS MINN
56097

SUPERINTENDENT

LANESBORO
INDEP SCH DISTRICT 0229
100 KIRKWOOD EAST
LANESBORO MINN
55949

SUPERINTENDENT

WYKOFF
INDEP SCH DISTRICT 0236
BOX 96
WYKOFF MINN
55990

SUPERINTENDENT

ALDEN
INDEP SCH DISTRICT 0242
BOX 99
ALDEN MINN
56009

SUPERINTENDENT

FARMINGTON
INDEP SCH DISTRICT 0192
510 WALNUT ST.
FARMINGTON MINN
55024

SUPERINTENDENT

WEST ST. PAUL
INDEP SCH DISTRICT 0197
1037 BIDWELL ST.
WEST ST. PAUL MINN
55118

SUPERINTENDENT

CLAREMONT
INDEP SCH DISTRICT 0201

CLAREMONT MINN
55924

SUPERINTENDENT

WEST CONCORD
INDEP SCH DISTRICT 0205
500 EUGENE ST.
WEST CONCORD MINN
55985

SUPERINTENDENT

KENSINGTON
INDEP SCH DISTRICT 0209

KENSINGTON MINN
56343

SUPERINTENDENT

ELMORE
INDEP SCH DISTRICT 0219
BOX 98
ELMORE MINN
56027

SUPERINTENDENT

WINNEBAGO
INDEP SCH DISTRICT 0225
BOX 65
WINNEBAGO MINN
56098

SUPERINTENDENT

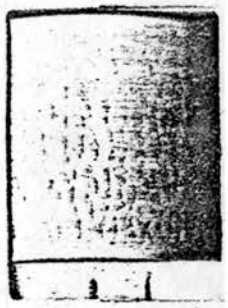
PETERSON
INDEP SCH DISTRICT 0232
BOX 8
PETERSON MINN
55962

SUPERINTENDENT

SPRING VALLEY
INDEP SCH DISTRICT 0237
BOX 72
SPRING VALLEY MINN
55975

SUPERINTENDENT

EMMONS
INDEP SCH DISTRICT 0243
BOX 13
EMMONS MINN
56029





AKEVILLE
NDEP SCH DISTRICT 0194
670 210TH ST. W.
AKEVILLE MINN
5044

UPERINTENDENT

NVER GROVE-PINE BEND
NDEP SCH DISTRICT 0199
875 INVER GROVE TR. E.
NVER GROVE HEIGHTS MINN
5075

UPERINTENDENT

CDGE CENTER
NDEP SCH DISTRICT 0202
CX 40
CDGE CENTER MINN
5927

UPERINTENDENT

LEXANDRIA
NDEP SCH DISTRICT 0206
TH & FILLMORE
LEXANDRIA MINN
6308

UPERINTENDENT

SAKIS
NDEP SCH DISTRICT 0213
4 CAK ST. E.
SAKIS MINN
6360

UPERINTENDENT

IESTER-WALTERS
NDEP SCH DISTRICT 0222
IESTER MINN
6051

UPERINTENDENT

LUE EARTH
NDEP SCH DISTRICT 0240
AST 6TH ST.
LUE EARTH MINN
6013

UPERINTENDENT

RESTON-FOUNTAIN
NDEP SCH DISTRICT 0233
CX 407
RESTON MINN
5965

UPERINTENDENT

ABEL-CANTON
NDEP SCH DISTRICT 0238
ILLMORE AVE.
ABEL MINN
5954

UPERINTENDENT

REEBORN
NDEP SCH DISTRICT 0244
CX 155
REEBORN MINN
6032

RANDOLPH
NDEP SCH DISTRICT 0195
BOX 38
RANDOLPH MINN
55065

SUPERINTENDENT

HASTINGS
INDEP SCH DISTRICT 0200
9TH & VERMILLION ST.
HASTINGS MINN
55033

SUPERINTENDENT

HAYFIELD
INDEP SCH DISTRICT 0203
HAYFIELD MINN
55940

SUPERINTENDENT

BRANDON
INDEP SCH DISTRICT 0207
BOX 185
BRANDON MINN
56315

SUPERINTENDENT

BRICELYN
INDEP SCH DISTRICT 0217
BOX 277
BRICELYN MINN
56014

SUPERINTENDENT

MINNESOTA LAKE
INDEP SCH DISTRICT 0223
BOX 218
MINNESOTA LAKE MINN
56068

SUPERINTENDENT

HARMONY
INDEP SCH DISTRICT 0228
145 MAIN AVE. S.
HARMONY MINN
55939

SUPERINTENDENT

RUSHFORD
INDEP SCH DISTRICT 0234
BOX 368
RUSHFORD MINN
55971

SUPERINTENDENT

ALBERT LEA
INDEP SCH DISTRICT 0241
109 WEST AVE.
ALBERT LEA MINN
56007

SUPERINTENDENT

GLENVILLE
INDEP SCH DISTRICT 0245
230 5TH ST. SE.
GLENVILLE MINN
56036





SUPERINTENDENT

CANNON FALLS
INDEP SCH DISTRICT 0252
820 E. MINNESOTA ST.
CANNON FALLS MINN
55009

SUPERINTENDENT

RED WING
INDEP SCH DISTRICT 0256
525 EAST AVE.
RED WING MINN
55066

SUPERINTENDENT

BARRETT
INDEP SCH DISTRICT 0262
BOX 273
BARRETT MINN
56311

SUPERINTENDENT

HOUSTON
INDEP SCH DISTRICT 0294
306 W. ELM
HOUSTON MINN
55943

SUPERINTENDENT

AKELEY
INDEP SCH DISTRICT 0301
BOX 246
AKELEY MINN
56433

SUPERINTENDENT

BRAHAM
INDEP SCH DISTRICT 0314
BOX 488
BRAHAM MINN
55006

SUPERINTENDENT

GRAND RAPIDS
INDEP SCH DISTRICT 0318
820 N. POKEGAMA AVE.
GRAND RAPIDS MINN
55744

SUPERINTENDENT

SIOUX VALLEY
INDEP SCH DISTRICT 0328
ROUTE 2
LAKE PARK, IOWA
51347

SUPERINTENDENT

ATWATER
INDEP SCH DISTRICT 0341
ATWATER MINN
56209

SUPERINTENDENT

PRINSBURG
COMMON SCH DISTRICT 0815
BOX 98
PRINSBURG MINN
56281

SUPERINTENDENT

GOODHUE
INDEP SCH DISTRICT 0253
BOX 128
GOODHUE MINN
55027

SUPERINTENDENT

WANAMINGO
INDEP SCH DISTRICT 0258
WANAMINGO MINN
55983



SUPERINTENDENT

ELBOW LAKE
INDEP SCH DISTRICT 0263
411 1ST ST. SE.
ELBOW LAKE MINN
56531

SUPERINTENDENT

SPRING GROVE
INDEP SCH DISTRICT 0297
BOX 626
SPRING GROVE MINN
55974

SUPERINTENDENT

LAPORTE
INDEP SCH DISTRICT 0306
BOX 8
LAPORTE MINN
56461

SUPERINTENDENT

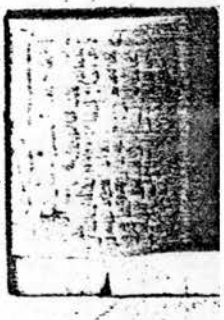
CAMBRIDGE
INDEP SCH DISTRICT 0911
430 NW. 8TH ST.
CAMBRIDGE MINN
55008

SUPERINTENDENT

NASHWAUK-KEEWATIN
INDEP SCH DISTRICT 0319
400 2ND ST.
NASHWAUK MINN
55769

SUPERINTENDENT

HERON LAKE-OKABENA
INDEP SCH DISTRICT 0330
BOX 378
HERON LAKE MINN
56137



SUPERINTENDENT

NEW LONDON-SPICER
INDEP SCH DISTRICT 0345
BOX 287
NEW LONDON MINN
56273

SUPERINTENDENT

HALLOCK
INDEP SCH DISTRICT 0351
BOX L
HALLOCK MINN
56728

UPERINTENDENT

ENYON
NDEP SCH DISTRICT 0254
01 FOREST
ENYON MINN
5946

SUPERINTENDENT

PINE ISLAND
INDEP SCH DISTRICT 0255
BOX 398
PINE ISLAND MINN
55963

UPERINTENDENT

UMBROTA
NDEP SCH DISTRICT 0260
05 MILL ST.
UMBROTA MINN
5992

SUPERINTENDENT

ASHBY
INDEP SCH DISTRICT 0261
BOX C
ASHBY MINN
56309

UPERINTENDENT

ERMAN
NDEP SCH DISTRICT 0264

ERMAN MINN
5248

SUPERINTENDENT

HOFFMAN
INDEP SCH DISTRICT 0265
BOX 306
HOFFMAN MINN
56339

UPERINTENDENT

ALEDONIA
NDEP SCH DISTRICT 0299
. MAIN ST.
ALEDONIA MINN
5921

SUPERINTENDENT

LA CRESCENT
INDEP SCH DISTRICT 0300
LANCER BLVD.
LA CRESCENT MINN
55947

UPERINTENDENT

EVIS
NDEP SCH DISTRICT 0308
OX 183
EVIS MINN
6467

SUPERINTENDENT

PARK RAPIDS
INDEP SCH DISTRICT 0309

PARK RAPIDS MINN
56470

UPERINTENDENT

CLERAINE
NDEP SCH DISTRICT 0316
OOSEVELT AVE.
CLERAINE MINN
5722

SUPERINTENDENT

DEER RIVER
INDEP SCH DISTRICT 0317

DEER RIVER MINN
56636

UPERINTENDENT

ACKSON
NDEP SCH DISTRICT 0324
05 5TH ST.
ACKSON MINN
6143

SUPERINTENDENT

LAKEFIELD
INDEP SCH DISTRICT 0325
BOX 338
LAKEFIELD MINN
56150

UPERINTENDENT

CRA
NDEP SCH DISTRICT 0332
00 E. MAPLE
CRA MINN
5051

SUPERINTENDENT

OGILVIE
INDEP SCH DISTRICT 0333
BOX 186
OGILVIE MINN
56358

UPERINTENDENT

AYMOND
NDEP SCH DISTRICT 0346
09 DAY ST.
AYMOND MINN
6282

SUPERINTENDENT

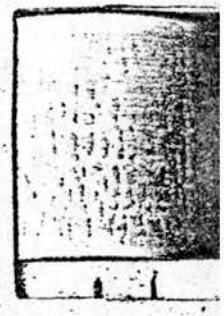
WILLMAR
INDEP SCH DISTRICT 0347
611 W. 5TH ST.
WILLMAR MINN
56201

UPERINTENDENT

UMBOLDT-ST. VINCENT
NDEP SCH DISTRICT 0352
OX 54
UMBOLDT MINN
6731

SUPERINTENDENT

KARLSTAD
INDEP SCH DISTRICT 0353
BOX 178
KARLSTAD MINN
56732





SUPERINTENDENT

KENNEDY
INDEP SCH DISTRICT 0354
BOX 127
KENNEDY MINN
56733

SUPERINTENDENT

SOUTH KOOCHICHING
INDEP SCH DISTRICT 0363
BOX 465
NORTHOME MINN
56661

SUPERINTENDENT

DAWSON-BOYD
INDEP SCH DISTRICT 0378
BOX S
DAWSON MINN
56232

SUPERINTENDENT

LE CENTER
INDEP SCH DISTRICT 0392
150 W. TYRONE ST.
LE CENTER MINN
56057

SUPERINTENDENT

HENDRICKS
INDEP SCH DISTRICT 0402
200 E. LINCOLN
HENDRICKS MINN
56136

SUPERINTENDENT

TYLER
INDEP SCH DISTRICT 0409
BOX 659
TYLER MINN
56178

SUPERINTENDENT

MINNEOTA
INDEP SCH DISTRICT 0414
504 N. MONROE ST.
MINNEOTA MINN
56264

SUPERINTENDENT

5 WEST & W CENTRAL ECSU
INDEP SCH DISTRICT 0991
SW STATE UNIVERSITY
MARSHALL MINN
56258

SUPERINTENDENT

LESTER PRAIRIE
INDEP SCH DISTRICT 0424
HICKORY AVE. & 2ND ST. N
LESTER PRAIRIE MINN
55354

SUPERINTENDENT

MAHNOMEN
INDEP SCH DISTRICT 0432
BOX 319
MAHNOMEN MINN
56557

SUPERINTENDENT

LANCASTER
INDEP SCH DISTRICT 0356
BOX 217
LANCASTER MINN
56735

SUPERINTENDENT

BELLINGHAM
INDEP SCH DISTRICT 0371
BOX 367
BELLINGHAM MINN
56212

SUPERINTENDENT

LAKE SUPERIOR
INDEP SCH DISTRICT 0381
405 4TH AVE.
TWO HARBORS MINN
55616

SUPERINTENDENT

LE SUEUR
INDEP SCH DISTRICT 0393
901 E. FERRY ST.
LE SUEUR MINN
56058

SUPERINTENDENT

IVANHOE
INDEP SCH DISTRICT 0403
BOX 9
IVANHOE MINN
56142

SUPERINTENDENT

BALATON
INDEP SCH DISTRICT 0411
330 THIRD ST.
BALATON MINN
56115

SUPERINTENDENT

LYND
INDEP SCH DISTRICT 0415
BOX 68
LYND MINN
56157

SUPERINTENDENT

BROWNTON
INDEP SCH DISTRICT 0421
BOX 338
BROWNTON MINN
55312

SUPERINTENDENT

SILVER LAKE
INDEP SCH DISTRICT 0425

SILVER LAKE MINN
55381

SUPERINTENDENT

WAUBUN
INDEP SCH DISTRICT 0435
BOX 98
WAUBUN MINN
56589





SUPERINTENDENT

INTERNATIONAL FALLS
INDEP SCH DISTRICT 0361
7TH ST. & 6TH AVE.
INTERNATIONAL FALLS MINN
56649

SUPERINTENDENT

LITTLEFORK-BIG FALLS
INDEP SCH DISTRICT 0362
BOX D
LITTLEFORK MINN
56653

SUPERINTENDENT

MARIETTA
INDEP SCH DISTRICT 0376
MARIETTA MINN
56257

SUPERINTENDENT

MADISON
INDEP SCH DISTRICT 0377
316 4TH ST.
MADISON MINN
56256

SUPERINTENDENT

LAKE OF THE WOODS
INDEP SCH DISTRICT 0390
BOX 310
BAUDETTE MINN
56623

SUPERINTENDENT

CLEVELAND
INDEP SCH DISTRICT 0391
CLEVELAND MINN
56017

SUPERINTENDENT

MONTGOMERY-LONSDALE
INDEP SCH DISTRICT 0394
601 2ND ST. NE.
MONTGOMERY MINN
56069

SUPERINTENDENT

WATERVILLE-ELYSIAN
INDEP SCH DISTRICT 0395
500 E. PAQUIN ST.
WATERVILLE MINN
56096

SUPERINTENDENT

LAKE BENTON
INDEP SCH DISTRICT 0404
101 GARFIELD ST.
LAKE BENTON MINN
56149

SUPERINTENDENT

VERDI
INDEP SCH DISTRICT 0408
BOX 7-A
VERDI MINN
56179

SUPERINTENDENT

SCOTTONWOOD
INDEP SCH DISTRICT 0412
BOX 107
SCOTTONWOOD MINN
56229

SUPERINTENDENT

MARSHALL
INDEP SCH DISTRICT 0413
401 S. SARATOGA ST.
MARSHALL MINN
56258

SUPERINTENDENT

TRACY
INDEP SCH DISTRICT 0417
934 PINE ST.
TRACY MINN
56175

SUPERINTENDENT

RUSSELL
INDEP SCH DISTRICT 0418
RUSSELL MINN
56169

SUPERINTENDENT

GLENCOE
INDEP SCH DISTRICT 0422
16TH ST. & PRYOR
GLENCOE MINN
55336

SUPERINTENDENT

HUTCHINSON
INDEP SCH DISTRICT 0423
30 GLEN ST. N.
HUTCHINSON MINN
55350

SUPERINTENDENT

STEWART
INDEP SCH DISTRICT 0426
STEWART MINN
55385

SUPERINTENDENT

WINSTED
INDEP SCH DISTRICT 0427
431 4TH ST. N.
WINSTED MINN
55395

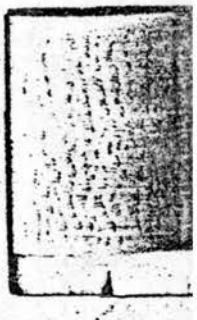
SUPERINTENDENT

ALVARADO
INDEP SCH DISTRICT 0436
BOX 816
ALVARADO MINN
56710

SUPERINTENDENT

ARGYLE
INDEP SCH DISTRICT 0437
BOX 279
ARGYLE MINN
56713





SUPERINTENDENT

MIDDLE RIVER
INDEP SCH DISTRICT 0440
BOX 130
MIDDLE RIVER MINN
56737

SUPERINTENDENT

STRANDQUIST
INDEP SCH DISTRICT 0444
BOX 6
STRANDQUIST MINN
56758

SUPERINTENDENT

EAST CHAIN
INDEP SCH DISTRICT 0453
ROUTE 1
BLUE EARTH MINN
56013

SUPERINTENDENT

TRUMAN
INDEP SCH DISTRICT 0458
BOX 276
TRUMAN MINN
56088

SUPERINTENDENT

EDEN VALLEY-WATKINS
INDEP SCH DISTRICT 0463
BOX 47
EDEN VALLEY MINN
55329

SUPERINTENDENT

ISLE
INDEP SCH DISTRICT 0473
BOX 25
ISLE MINN
56342

SUPERINTENDENT

LITTLE FALLS
INDEP SCH DISTRICT 0482
109 NE. 2ND AVE.
LITTLE FALLS MINN
56345

SUPERINTENDENT

SWANVILLE
INDEP SCH DISTRICT 0486
BOX 98
SWANVILLE MINN
56382

SUPERINTENDENT

LYLE
INDEP SCH DISTRICT 0497
BOX 38
LYLE MINN
55953

SUPERINTENDENT

FULDA
INDEP SCH DISTRICT 0505

FULDA MINN
56131

SUPERINTENDENT

NEWFOLDEN
INDEP SCH DISTRICT 0441
BOX 277
NEWFOLDEN MINN
56738

SUPERINTENDENT

WARREN
INDEP SCH DISTRICT 0446
224 E. BRIDGE ST.
WARREN MINN
56762

SUPERINTENDENT

FAIRMONT
INDEP SCH DISTRICT 0454
115 S. PARK ST.
FAIRMONT MINN
56031

SUPERINTENDENT

WELCOME
INDEP SCH DISTRICT 0459

WELCOME MINN
56181

SUPERINTENDENT

GROVE CITY
INDEP SCH DISTRICT 0464
BOX 278
GROVE CITY MINN
56243

SUPERINTENDENT

PRINCETON
INDEP SCH DISTRICT 0477
606 S. 3RD ST.
PRINCETON MINN
55371

SUPERINTENDENT

MOTLEY
INDEP SCH DISTRICT 0483
BOX 268
MOTLEY MINN
56466

SUPERINTENDENT

UPSALA
INDEP SCH DISTRICT 0487

UPSALA MINN
56384

SUPERINTENDENT

LE ROY-OSTRANDER
INDEP SCH DISTRICT 0499
BOX N
LE ROY MINN
55951

SUPERINTENDENT

CHANDLER-LAKE WILSON
INDEP SCH DISTRICT 0918

LAKE WILSON MINN
56151





JPERINTENDENT

SLC
.DEP SCH DISTRICT 0442

SLC MINN
744

JPERINTENDENT

RYGLA-GATZKE
NDEP SCH DISTRICT 0447
BX 18
RYGLA MINN
727

JPERINTENDENT

HERBURN
NDEP SCH DISTRICT 0456

HERBURN MINN
5171

JPERINTENDENT

RANADA-HUNTLEY
NDEP SCH DISTRICT 0460
BX 17
RANADA MINN
5039

JPERINTENDENT

ITCHFIELD
NDEP SCH DISTRICT 0465
01 GILMAN AVE. N.
ITCHFIELD MINN
5355

JPERINTENDENT

NAMIA
NDEP SCH DISTRICT 0480
BX B
NAMIA MINN
5359

JPERINTENDENT

IERZ
NDEP SCH DISTRICT 0484

IERZ MINN
5364

JPERINTENDENT

JSTIN
NDEP SCH DISTRICT 0492
02 4TH AVE. NE.
JSTIN MINN
5912

JPERINTENDENT

OUTHLAND
NDEP SCH DISTRICT 0500

AMS MINN
5909

JPERINTENDENT

CCLLET
NDEP SCH DISTRICT 0507
BX 108
CCLLET MINN
5074

SUPERINTENDENT

STEPHEN
INDEP SCH DISTRICT 0443
BOX 68
STEPHEN MINN
56757

SUPERINTENDENT

CEYLON
INDEP SCH DISTRICT 0451
BOX 368
CEYLON MINN
56121

SUPERINTENDENT

TRIMONT
INDEP SCH DISTRICT 0457
BOX N
TRIMONT MINN
56176

SUPERINTENDENT

COSMOS
INDEP SCH DISTRICT 0461
320 N. SATURN ST.
COSMOS MINN
56228

SUPERINTENDENT

DASSEL-COKATO
INDEP SCH DISTRICT 0466
HWY. 12 & WRIGHT CO. 100
COKATO MINN
55321

SUPERINTENDENT

MILACA
INDEP SCH DISTRICT 0912
500 SW. 4TH ST.
MILACA MINN
56353

SUPERINTENDENT

ROYALTON
INDEP SCH DISTRICT 0485
BOX 5
ROYALTON MINN
56373

SUPERINTENDENT

GRAND MEADOW
INDEP SCH DISTRICT 0495
BOX 68
GRAND MEADOW MINN
55936

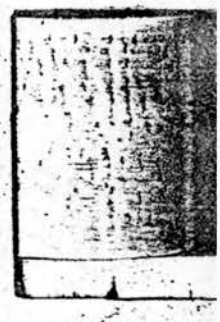
SUPERINTENDENT

SLAYTON
INDEP SCH DISTRICT 0504
2420 28TH ST.
SLAYTON MINN
56172

SUPERINTENDENT

ST. PETER
INDEP SCH DISTRICT 0508
L INCOLN DRIVE
ST. PETER MINN
56082





SUPERINTENDENT

ADRIAN
INDEP SCH DISTRICT 0511
BOX 38
ADRIAN MINN
56110

SUPERINTENDENT

WORTHINGTON
INDEP SCH DISTRICT 0518
BOX C
WORTHINGTON MINN
56187

SUPERINTENDENT

HALSTAD
INDEP SCH DISTRICT 0524

HALSTAD MINN
56548

SUPERINTENDENT

BYRON
INDEP SCH DISTRICT 0531
BOX 157
BYRON MINN
55920

SUPERINTENDENT

SOUTHEAST ECSU
INDEP SCH DISTRICT 0921
5930 BANDEL ROAD
ROCHESTER MINN
55901

SUPERINTENDENT

HENNING
INDEP SCH DISTRICT 0545
BOX 15
HENNING MINN
56551

SUPERINTENDENT

UNDERWOOD
INDEP SCH DISTRICT 0550

UNDERWOOD MINN
56586

SUPERINTENDENT

THIEF RIVER FALLS
INDEP SCH DISTRICT 0564
BOX 160
THIEF RIVER FALLS MINN
56701

SUPERINTENDENT

HINCKLEY
INDEP SCH DISTRICT 0573
BOX 308
HINCKLEY MINN
55037

SUPERINTENDENT

EDGERTON
INDEP SCH DISTRICT 0581
BOX 307
EDGERTON MINN
56128

SUPERINTENDENT

BREWSTER
INDEP SCH DISTRICT 0513
BOX 309
BREWSTER MINN
56119

SUPERINTENDENT

ADA
INDEP SCH DISTRICT 0521
105 E. 4TH AVE.
ADA MINN
56510

SUPERINTENDENT

HENDRUM-PERLEY
INDEP SCH DISTRICT 0525
BOX 39
HENDRUM MINN
56550

SUPERINTENDENT

DOVER-EYOTA
INDEP SCH DISTRICT 0533
BOX 268
EYOTA MINN
55934

SUPERINTENDENT

BATTLE LAKE
INDEP SCH DISTRICT 0542

BATTLE LAKE MINN
56515

SUPERINTENDENT

PARKERS PRAIRIE
INDEP SCH DISTRICT 0547
BOX 46
PARKERS PRAIRIE MINN
56361

SUPERINTENDENT

NEW YORK MILLS
INDEP SCH DISTRICT 0553
BOX 218
NEW YORK MILLS MINN
56567

SUPERINTENDENT

NORTHWEST ECSU
INDEP SCH DISTRICT 0928
BOX 160
THIEF RIVER FALLS MINN
56701

SUPERINTENDENT

SANDSTONE
INDEP SCH DISTRICT 0576

SANDSTONE MINN
55072

SUPERINTENDENT

JASPER
INDEP SCH DISTRICT 0582

JASPER MINN
56144





UPERINTENDENT

LLSWORTH
NDEP SCH DISTRICT 0514
X 8
LLSWORTH MINN
5129

UPERINTENDENT

CRUP
NDEP SCH DISTRICT 0522

CRUP MINN
6519

UPERINTENDENT

WIN VALLEY
NDEP SCH DISTRICT 0526

WIN VALLEY MINN
5584

UPERINTENDENT

TEWARTVILLE
NDEP SCH DISTRICT 0534
00 SW. 4TH ST.
TEWARTVILLE MINN
5976

UPERINTENDENT

EER CREEK
NDEP SCH DISTRICT 0543
CX 235
EER CREEK MINN
6527

UPERINTENDENT

ELICAN RAPIDS
NDEP SCH DISTRICT 0548
CX V
ELICAN RAPIDS MINN
6572

UPERINTENDENT

EST CENTRAL ECSU
NDEP SCH DISTRICT 0926
20 S. VINE, PO DRAWER E
ERGUS FALLS MINN
6537

UPERINTENDENT

SKOV
NDEP SCH DISTRICT 0566

SKOV MINN
5704

UPERINTENDENT

ILLOW RIVER
NDEP SCH DISTRICT 0577
OX 66
ILLOW RIVER MINN
5795

UPERINTENDENT

IPESTONE
NDEP SCH DISTRICT 0583
OX 71
IPESTONE MINN
6164

SUPERINTENDENT

[redacted]UND LAKE
INDEP SCH DISTRICT 0516
ROUND LAKE MINN
56167

SUPERINTENDENT

GARY
INDEP SCH DISTRICT 0523
BOX 47
GARY MINN
56545

SUPERINTENDENT

CHATFIELD
INDEP SCH DISTRICT 0227
CHATFIELD MINN
55923

SUPERINTENDENT

ROCHESTER
INDEP SCH DISTRICT 0535
401 2ND ST. SW.
ROCHESTER MINN
55901

SUPERINTENDENT

FERGUS FALLS
INDEP SCH DISTRICT 0544
600 FRIBERG AVE.
FERGUS FALLS MINN
56537

SUPERINTENDENT

PERHAM
INDEP SCH DISTRICT 0549
200 5TH ST. SE.
PERHAM MINN
56573

SUPERINTENDENT

GOODRIDGE
INDEP SCH DISTRICT 0561
BOX 195
GOODRIDGE MINN
56725

SUPERINTENDENT

FINLAYSON
INDEP SCH DISTRICT 0570
FINLAYSON MINN
55735

SUPERINTENDENT

PINE CITY
INDEP SCH DISTRICT 0578
605 6TH ST.
PINE CITY MINN
55063

SUPERINTENDENT

RUTHTON
INDEP SCH DISTRICT 0584
BOX 8
RUTHTON MINN
56170





SUPERINTENDENT

CLIMAX
INDEP SCH DISTRICT 0592
BOX 45
CLIMAX MINN
56523

SUPERINTENDENT

CROOKSTON
INDEP SCH DISTRICT 0593
BOX 602
CROOKSTON MINN
56716

SUPERINTENDENT

FERTILE-BELTRAMI
INDEP SCH DISTRICT 0599
FERTILE MINN
56540

SUPERINTENDENT

FISHER
INDEP SCH DISTRICT 0600
BOX 37
FISHER MINN
56723

SUPERINTENDENT

MENTOR
INDEP SCH DISTRICT 0604
MENTOR MINN
56736

SUPERINTENDENT

CYRUS
INDEP SCH DISTRICT 0611
BOX 39
CYRUS MINN
56323

SUPERINTENDENT

VILLARD
INDEP SCH DISTRICT 0615
BOX 66
VILLARD MINN
56385

SUPERINTENDENT

OKLEE
INDEP SCH DISTRICT 0627
OKLEE MINN
56742

SUPERINTENDENT

BELVIEW
INDEP SCH DISTRICT 0631
BOX 8
BELVIEW MINN
56214

SUPERINTENDENT

LAMBERTON
INDEP SCH DISTRICT 0633
BOX 278
LAMBERTON MINN
56152

SUPERINTENDENT

REDWOOD FALLS
INDEP SCH DISTRICT 0637
4TH & LINCOLN
REDWOOD FALLS MINN
56283

SUPERINTENDENT

SANBORN
INDEP SCH DISTRICT 0638
SANBORN MINN
56083

SUPERINTENDENT

BIRD ISLAND
INDEP SCH DISTRICT 0646
110 S. 9TH ST.
BIRD ISLAND MINN
55310

SUPERINTENDENT

BUFFALO LAKE
INDEP SCH DISTRICT 0647
BOX 278
BUFFALO LAKE MINN
55314

SUPERINTENDENT

FRANKLIN
INDEP SCH DISTRICT 0650
BOX 38
FRANKLIN MINN
55333

SUPERINTENDENT

HECTOR
INDEP SCH DISTRICT 0651
HECTOR MINN
55342

SUPERINTENDENT

RENVILLE
INDEP SCH DISTRICT 0654
BOX 338
RENVILLE MINN
56284

SUPERINTENDENT

SACRED HEART
INDEP SCH DISTRICT 0655
BOX 10
SACRED HEART MINN
56285

SUPERINTENDENT

NORTHFIELD
INDEP SCH DISTRICT 0659
301 UNION ST.
NORTHFIELD MINN
55057

SUPERINTENDENT

MAGNOLIA
INDEP SCH DISTRICT 0669
MAGNOLIA MINN
56158





SUPERINTENDENT

EAST GRAND FORKS
INDEP SCH DISTRICT 0595
420 4TH AVE. NW.
EAST GRAND FORKS MINN
56721

SUPERINTENDENT

ERSKINE
INDEP SCH DISTRICT 0597
BOX 209
ERSKINE MINN
56535

SUPERINTENDENT

ESSTON
INDEP SCH DISTRICT 0601

ESSTON MINN
56542

SUPERINTENDENT

MC INTOSH
INDEP SCH DISTRICT 0603

MC INTOSH MINN
56556

SUPERINTENDENT

GLENWOOD
INDEP SCH DISTRICT 0612
NE. 2ND AVE.
GLENWOOD MINN
56334

SUPERINTENDENT

STARBUCK
INDEP SCH DISTRICT 0614

STARBUCK MINN
56381

SUPERINTENDENT

PLUMMER
INDEP SCH DISTRICT 0628

PLUMMER MINN
56748

SUPERINTENDENT

RED LAKE FALLS
INDEP SCH DISTRICT 0630
BOX 367
RED LAKE FALLS MINN
56750

SUPERINTENDENT

MILROY
INDEP SCH DISTRICT 0635
BOX 10
MILROY MINN
56263

SUPERINTENDENT

MORGAN
INDEP SCH DISTRICT 0636
BOX 188
MORGAN MINN
56266

SUPERINTENDENT

NABASSO
INDEP SCH DISTRICT 0640
1333 MAY ST.
NABASSO MINN
56293

SUPERINTENDENT

WALNUT GROVE
INDEP SCH DISTRICT 0641

WALNUT GROVE MINN
56180

SUPERINTENDENT

DANUBE
INDEP SCH DISTRICT 0648
BOX 157
DANUBE MINN
56230

SUPERINTENDENT

FAIRFAX
INDEP SCH DISTRICT 0649
300 SE. 2ND ST., BOX 489
FAIRFAX MINN
55332

SUPERINTENDENT

MORTON
INDEP SCH DISTRICT 0652
BOX 68
MORTON MINN
56270

SUPERINTENDENT

OLIVIA
INDEP SCH DISTRICT 0653
709 S. 9TH ST.
OLIVIA MINN
56277

SUPERINTENDENT

FARIBAULT
INDEP SCH DISTRICT 0656
2855 NW. 1ST AVE.
FARIBAULT MINN
55021

SUPERINTENDENT

MORRISTOWN
INDEP SCH DISTRICT 0657
BOX 278
MORRISTOWN MINN
55052

SUPERINTENDENT

LUVERNE
INDEP SCH DISTRICT 0670
BOX 278
LUVERNE MINN
56156

SUPERINTENDENT

HILLS-BEAVER CREEK
INDEP SCH DISTRICT 0671
BOX 547
HILLS MINN
56138





SUPERINTENDENT

BADGER
INDEP SCH DISTRICT 0676
BOX 68
BADGER MINN
56714

SUPERINTENDENT

BELLE PLAINE
INDEP SCH DISTRICT 0716
220 S. MARKET ST.
BELLE PLAINE MINN
56011

SUPERINTENDENT

NEW PRAGUE
INDEP SCH DISTRICT 0721
721 CENTRAL AVE. N.
NEW PRAGUE MINN
56071

SUPERINTENDENT

ARLINGTON
INDEP SCH DISTRICT 0731
202 3RD AVE. NW.
ARLINGTON MINN
55307

SUPERINTENDENT

WINTHROP
INDEP SCH DISTRICT 0735
N. COTTONWOOD ST.
WINTHROP MINN
55396

SUPERINTENDENT

KIMBALL
INDEP SCH DISTRICT 0739
BOX 368
KIMBALL MINN
55353

SUPERINTENDENT

SAUK CENTRE
INDEP SCH DISTRICT 0743
9TH & STATE ROAD
SAUK CENTRE MINN
56378

SUPERINTENDENT

CENTRAL ECSU
INDEP SCH DISTRICT 0923
RM A150-EDU BLDG, UNIV
ST. CLOUD MINN
56301

SUPERINTENDENT

MEDFORD
INDEP SCH DISTRICT 0763
BOX 38
MEDFORD MINN
55049

SUPERINTENDENT

KERKHOVEN-MURDOCK
INDEP SCH DISTRICT 0775

KERKHOVEN MINN
56252

SUPERINTENDENT

GREENBUSH
INDEP SCH DISTRICT 0678
BOX 70
GREENBUSH MINN
56726

SUPERINTENDENT

JORDAN
INDEP SCH DISTRICT 0717
500 SUNSET DRIVE
JORDAN MINN
55352

SUPERINTENDENT

BECKER
INDEP SCH DISTRICT 0726
BOX 188
BECKER MINN
55308

SUPERINTENDENT

GAYLORD
INDEP SCH DISTRICT 0732
500 COURT AVE.
GAYLORD MINN
55334

SUPERINTENDENT

BELGRADE
INDEP SCH DISTRICT 0736

BELGRADE MINN
56312

SUPERINTENDENT

MELROSE
INDEP SCH DISTRICT 0740
546 N. 5TH AVE. E.
MELROSE MINN
56352

SUPERINTENDENT

ALBANY
INDEP SCH DISTRICT 0745
140 3RD ST.
ALBANY MINN
56307

SUPERINTENDENT

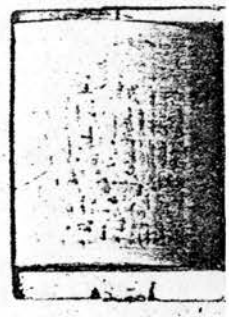
BLOOMING PRAIRIE
INDEP SCH DISTRICT 0756
202 4TH AVE. NW.
BLOOMING PRAIRIE MINN
55917

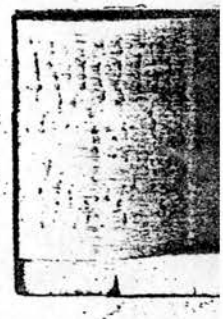
SUPERINTENDENT

HANCOCK
INDEP SCH DISTRICT 0768
BOX 367
HANCOCK MINN
56244

SUPERINTENDENT

BENSON
INDEP SCH DISTRICT 0777
1400 MONTANA AVE.
BENSON MINN
56215





UPERINTENDENT

CSEAU
NDEP SCH DISTRICT 0682
09 3RD ST. NE.
CSEAU MINN
6751

UPERINTENDENT

RICR LAKE
NDEP SCH DISTRICT 0719
5870 FRANKLIN TRAIL SE.
RICR LAKE MINN
5372

UPERINTENDENT

IG LAKE
NDEP SCH DISTRICT 0727

IG LAKE MINN
5309

UPERINTENDENT

IBBON
NDEP SCH DISTRICT 0733

IBBON MINN
5335

UPERINTENDENT

RCOTEN
NDEP SCH DISTRICT 0737
CX 38
RCCTEN MINN
6316

UPERINTENDENT

AYNESVILLE
NDEP SCH DISTRICT 0741
IGHWAY 23 WEST
AYNESVILLE MINN
6362

UPERINTENDENT

ARTELL
NDEP SCH DISTRICT 0748
OX 328
ARTELL MINN
6377

UPERINTENDENT

WATONNA
NDEP SCH DISTRICT 0761
515 WEST BRIDGE
WATONNA MINN
5060

UPERINTENDENT

CRRIS
NDEP SCH DISTRICT 0769
201 S. COLUMBIA
CRRIS MINN
6267

UPERINTENDENT

APPLETON
NDEP SCH DISTRICT 0784
128 S. HERING
APPLETON MINN
6208

PERINTENDENT

ARROAD
INDEP SCH DISTRICT 0690
BOX 130
WARROAD MINN
56763

SUPERINTENDENT

SHAKOPEE
INDEP SCH DISTRICT 0720
505 S. HOLMES
SHAKOPEE MINN
55379

SUPERINTENDENT

ELK RIVER
INDEP SCH DISTRICT 0728
400 SCHOOL ST.
ELK RIVER MINN
55330

SUPERINTENDENT

HENDERSON
INDEP SCH DISTRICT 0734
107 8TH ST.
HENDERSON MINN
56044

SUPERINTENDENT

HOLDINGFORD
INDEP SCH DISTRICT 0738
BOX 496
HOLDINGFORD MINN
56340

SUPERINTENDENT

ST. CLOUD
INDEP SCH DISTRICT 0742
628 ROOSEVELT ROAD
ST. CLOUD MINN
56301

SUPERINTENDENT

COLD SPRING
INDEP SCH DISTRICT 0750
ROCORI HIGH SCHOOL
COLD SPRING MINN
56320

SUPERINTENDENT

ELLENDALE-GENEVA
INDEP SCH DISTRICT 0762
BOX 428
ELLENDALE MINN
56026

SUPERINTENDENT

CHOKIO-ALBERTA
INDEP SCH DISTRICT 0771
BOX 87
CHOKIO MINN
56221

SUPERINTENDENT

BERTHA-HEWITT
INDEP SCH DISTRICT 0786

BERTHA MINN
56437





SUPERINTENDENT

BROWERVILLE
INDEP SCH DISTRICT 0787
BOX 195
BROWERVILLE MINN
56438

SUPERINTENDENT

LONG PRAIRIE
INDEP SCH DISTRICT 0792
205 SECOND ST. S.
LONG PRAIRIE MINN
56347

SUPERINTENDENT

WHEATON
INDEP SCH DISTRICT 0803
1700 3RD AVE. S.
WHEATON MINN
56296

SUPERINTENDENT

WABASHA
INDEP SCH DISTRICT 0811
611 BROADWAY AVE.
WABASHA MINN
55981

SUPERINTENDENT

SEBEKA
INDEP SCH DISTRICT 0820

SEBEKA MINN
56477

SUPERINTENDENT

JANESVILLE
INDEP SCH DISTRICT 0830
110 E. 3RD ST.
JANESVILLE MINN
56048

SUPERINTENDENT

SOUTH WASHINGTON COUNTY
INDEP SCH DISTRICT 0833
8040 80TH ST. S.
COTTAGE GROVE MINN
55016

SUPERINTENDENT

MADELIA
INDEP SCH DISTRICT 0837
320 BUCK AVE. SE.
MADELIA MINN
56062

SUPERINTENDENT

CAMPBELL-TINTAH
INDEP SCH DISTRICT 0852
BOX 8
CAMPBELL MINN
56522

SUPERINTENDENT

ANNANDALE
INDEP SCH DISTRICT 0876
BOX 190
ANNANDALE MINN
55302

SUPERINTENDENT

CLARISSA
INDEP SCH DISTRICT 0789

CLARISSA MINN
56440

SUPERINTENDENT

STAPLES
INDEP SCH DISTRICT 0793
3RD ST.
STAPLES MINN
56479

SUPERINTENDENT

ELGIN-MILLVILLE
INDEP SCH DISTRICT 0806
1ST STREET SE.
ELGIN MINN
55932

SUPERINTENDENT

LAKE CITY
INDEP SCH DISTRICT 0813

LAKE CITY MINN
55041

SUPERINTENDENT

MENAHGA
INDEP SCH DISTRICT 0821
BOX 160
MENAHGA MINN
56464

SUPERINTENDENT

WALDORF-PEMBERTON
INDEP SCH DISTRICT 0913

WALDORF MINN
56091

SUPERINTENDENT

STILLWATER
INDEP SCH DISTRICT 0834
6225 OASIS AVE. N.
STILLWATER MINN
55082

SUPERINTENDENT

ST. JAMES
INDEP SCH DISTRICT 0840
10TH AVE. N.
ST. JAMES MINN
56081

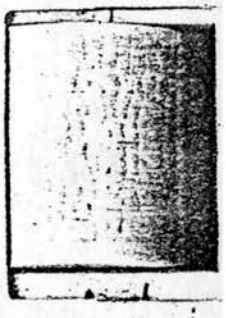
SUPERINTENDENT

LEWISTON
INDEP SCH DISTRICT 0857

LEWISTON MINN
55952

SUPERINTENDENT

BUFFALO
INDEP SCH DISTRICT 0877
109 4TH ST. NE.
BUFFALO MINN
55313





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AGLE BEND NDEP SCH DISTRICT OX K AGLE BEND 6446	0790 MINN	GREY EAGLE INDEP SCH DISTRICT GREY EAGLE 56336	0791 MINN	(
UPERINTENDENT		SUPERINTENDENT		
ORTH CENTRAL ECSU NDEP SCH DISTRICT 22 N. 2ND ST. APLES 6479	0924 MINN	BROWNS VALLEY INDEP SCH DISTRICT BOX N BROWNS VALLEY 56219	0801 MINN	(
UPERINTENDENT		SUPERINTENDENT		
AZEPPA NDEP SCH DISTRICT OX 100 AZEPPA 5956	0809 MINN	PLAINVIEW INDEP SCH DISTRICT 500 W. BROADWAY PLAINVIEW 55964	0810 MINN	(
UPERINTENDENT		SUPERINTENDENT		
ERNDALE NDEP SCH DISTRICT OX G ERNDALE 5481	0818 MINN	WADENA INDEP SCH DISTRICT BOX 151 WADENA 56482	0819 MINN	(
UPERINTENDENT		SUPERINTENDENT		
EW RICHLAND-HARTLAND NDEP SCH DISTRICT OX 188 EW RICHLAND 6072	0827 MINN	WASECA INDEP SCH DISTRICT 501 E. ELM AVE. WASECA 56093	0829 MINN	(
UPERINTENDENT		SUPERINTENDENT		
REST LAKE NDEP SCH DISTRICT 08 SW. 15TH ST. REST LAKE 5025	0831 MINN	MAHTOMEDI INDEP SCH DISTRICT 814 MAHTOMEDI AVE. MAHTOMEDI 55115	0832 MINN	(
UPERINTENDENT		SUPERINTENDENT		
E. METROPOLITAN AVTI NDEP SCH DISTRICT 300 CENTURY AVE. N HITE BEAR LAKE 5110	0916 MINN	BUTTERFIELD INDEP SCH DISTRICT BOX 189 BUTTERFIELD 56120	0836 MINN	(
UPERINTENDENT		SUPERINTENDENT		
RECKENRIDGE NDEP SCH DISTRICT 3TH ST. & DOUGLAS AVE. RECKENRIDGE 6520	0846 MINN	ROTHSAY INDEP SCH DISTRICT BOX 247 ROTHSAY 56579	0850 MINN	(
UPERINTENDENT		SUPERINTENDENT		
T. CHARLES NDEP SCH DISTRICT IGHWAY 14 EAST T. CHARLES 5972	0858 MINN	WINONA INDEP SCH DISTRICT 166 W. BROADWAY WINONA 55987	0861 MINN	(
UPERINTENDENT		SUPERINTENDENT		
ELANO NDEP SCH DISTRICT ELANO 5328	0879 MINN	HOWARD LAKE-WAVERLY INDEP SCH DISTRICT BOX 408 HOWARD LAKE 55349	0880 MINN	(

SUPERINTENDENT

MAPLE LAKE
INDEP SCH DISTRICT 0881
133 MOLAND AVE.
MAPLE LAKE MINN
55359

SUPERINTENDENT

MONTICELLO
INDEP SCH DISTRICT 0882
BOX 897
MONTICELLO MINN
55362

SUPERINTENDENT

CANBY
INDEP SCH DISTRICT 0891
307 1ST ST. W.
CANBY MINN
56220

SUPERINTENDENT

CLARKFIELD
INDEP SCH DISTRICT 0892
CLARKFIELD MINN
56223



SUPERINTENDENT

WOOD LAKE
INDEP SCH DISTRICT 0896

WOOD LAKE MINN
56297

SUPERINTENDENT

ROCKFORD
INDEP SCH DISTRICT 0883
BOX 9
ROCKFORD MINN
55373

SUPERINTENDENT

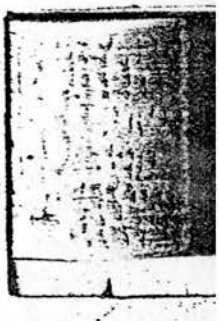
ST. MICHAEL-ALBERTVILLE
INDEP SCH DISTRICT 0885
ST. MICHAEL MINN
55376

SUPERINTENDENT

ECHO
INDEP SCH DISTRICT 0893
BOX 246
ECHO MINN
56237

SUPERINTENDENT

GRANITE FALLS
INDEP SCH DISTRICT 0894
450 9TH AVE.
GRANITE FALLS MINN
56241



NNIE BANNANNO
CM 300
45 UNIVERSITY AVE
PAUL, MN 55104

CEKER HARTFELD HEDGES
GRANT-ATTORNEYS
50 METRO DR-SUITE 800
LS, MN 55420

ELLY KLEINSCHRODT DIER
21 UNIVERSITY AVE
OM 373 SO
PAUL, MN 55104

RYLEE FITHIAN
EN & ASSOCIATES
5 PARK AVE SO
LS, MN 55404

VERN. RELATIONS DEPT
ITED WAY OF MPLS AREA
4 SO 80TH ST
LS, MN 55404

L. HELD
D SCH DIST 518
C BOX C
RTHINGTON, MN 56187

NN BOARD OF NURSING
7 DELAWARE ST SE
PLS, MN 55414

OMAS POLT
TORNEY AT LAW
CARTHY BLDG
OTA, MN 55934

RGARET SANDBERG
PT OF HEALTH
7 DELAWARE ST SE
LS, MN 55440

LE SWANSON-LAW OFFICE
ITE 113 PROFESS. BLDG
68 SO LAKE ST
REST LAKE, MN 55025

RRY WICKS, UNISERV
R-ROCHESTER ED ASSO
1 N BROADWAY

ROGER BUETTNER, ADM ASST
SO PAUL SCH DIST
700 N 2ND ST
SO ST PAUL, MN 55075

RICK CARTER
MINN ASSO HEALTH CARE
2850 METRO DR-SUITE 429
MPLS, MN 55420

JANICE DEVENS, DIR
HUMAN SERVICE AGENCY
WRIGHT CO COURTHOUSE
BUFFALO, MN 55313

LEO FITZPATRICK
8138 HENSLOWE AVE SO
COTTAGE GROVE, MN 55016

LYNN GRUBER-MN MED ASSO
900 AMER NAT'L BANK BLDG
101 E 5TH ST
ST PAUL, MN 55101

GENE JOHANNES
MINN CHIROPRACTIC ASSO
2353 RICE ST-SUITE 170
ST PAUL, MN 55113

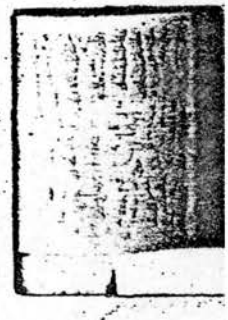
JEAN MOORHEAD
YWCA
1130 NICOLLET AVE
MPLS, MN 55403

SUSAN ROBERTSON
LCRAR-RM 430
STATE OFFICE BLDG
inter-office

EXECUTIVE DIRECTOR
SW & W CENTRAL ECSU
SOUTHWEST STATE UNIV
MARSHALL, MN 56258

MARY SAMOSZUK
MN HIGHER ED COOR BOARD
SUITE 400 CAPITOL SQUARE
ST PAUL, MN 55101





Lorraine De Nieler
1414 13th Ave. E.
Hibbing, MN 55746

Charlotte Vick
2507 Fremont N.
Mpls., MN 55411

Barbara Johnson
1636 Taylor Ave.
St. Paul, MN 55104

Kristin Larson
2215 W. 21st St.
Mpls., MN 55405

Aviva Breen - Legal Serv.
Advocacy Project
60 E. 4th St.
St. Paul, MN 55101

Marliss Johnston
Region 9
Box 3367

Kris Juliar - Rgn. 9
Development Commission
410 So. 5th St.
P.O. Box 3367
Mankato, MN 56001

Alice Anderson
175 So. Western
St. Paul, MN 55102

Sara Johnston-Rodriguez
Rgn. 9 Dev. Commission
Box 3367
410 So 5th St.
Mankato, MN 56001

Luddene Perry
Box 194
Staples, MN 56479

William R. Barda
1912 Greenwook St.
Apt. #104
Thief River Falls, MN 56701

Nancy A. Nelson
1308 W. 24th St.
Mpls., MN 55405

Alan Ingram
MN Asso-Social Workers
614 Portland
St. Paul, MN 55102

Mary E. Martin
1001 Penn Ave. N.
Mpls., MN 55411

David G. Le Moine
2419 Buchanan St. NE
Mpls., MN 55418

Ardis Kyker - MASSP
Suite 350 Hanover Bldg.
480 Cedar St.
St. Paul, MN 55101

Pat Rife
6 W. 5th Suite 790
St. Paul, MN 55102

Dr. Glenn Holman
Faribault Public Schools
2855 1st Ave. NW
Faribault, MN 55021

Eileen Wells
204¼ Chestnut St.
Virginia, MN 55792

Ken Kadlec
762 Holly Ave.
St. Paul, MN 55104

Dr. Jeanne Dorle
Roseville Schools
1251 W. Co. Rd. B-2
Roseville, MN 55113

Pete Lansdowne
So. MN Legal Services
310 Medical Arts Bldg.
Albert Lea, MN 56007

Sharon G. Kopp
Western MN Legal Service
407 W. Litchfield Ave.
Willmar MN 56201

AROL COLE, DIR
CENTRAL SP ED COOP
ROST, MN
6033

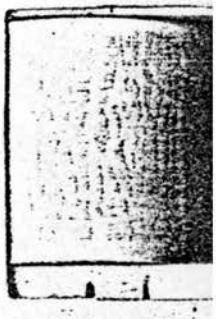
PHILLIP KOPROWSKI, DIR
WASECA RGN INTERDISTRICT
409 8TH AVE NE
WASECA, MN 56093

UGUST RIVERA, DIR OF
INFORMATION SERVICES
01 NE BROADWAY
PLS MN 55413

CHARLES SEDERBERG
300 HEALTH SERVICE BLDG
U OF M - ST PAUL CAMPUS
ST PAUL MN 55108

IM KJELSTRUP
ETROIT LAKES ED COOP
02 LAKE AVENUE
ETROIT LAKES MN 56501

THURM WETTELAND
LAKE AGASSIZ SP ED COOP
PO BOX 38
AUDOBON MN 56511



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RUNESTONE SP ED
7TH & FILLMORE
ALEXANDRIA MN 56308

GARY LEE, DIR
ST PETER INTERDISTRICT
HWY 22N
ST PETER MN 56082

DR JOHN HAUGO
MECC
2520 BROADWAY DRIVE
LAUDERDALE MN 55113

DR ALLEN MEYERS, COLLEGE
OF ED/U OF M - DULUTH
125 BOHANNON HALL
DULUTH MN 55312

GARY MOHRENWEISER
ED. MANAGEMENT SERVICES
4510 W 77TH STREET
MINNEAPOLIS MN 55435

EUGENE ZABINSKI
BOUNDARY WATERS ED COOP
600 E HARVEY STREET
ELY, MN 55731

MIDWEST SPECIAL ED COOP
600 COLUMBIA AVE.
MORRIS MN
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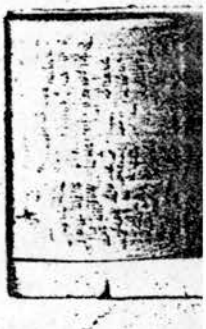

PEOPLE, INC
3725 47TH AVE SOUTH
MPLS, MN 55406

1821 UNIVERSITY AVE
ST PAUL, MN 55104

CRISTINE E BOSWELL
ASSO DIR, MARC
2344 NICOLLET AVE SO
MPLS, MN 55404

RICHARD BUSKE
DEPT OF ECONOMIC DEV.
480 CEDAR ST
ST PAUL, MN 55101

FRED CHRISTIANSEN
ROOM 911 CAPITOL SQ BLDG
550 CEDAR ST
ST PAUL, MN 55101

JEAN DAWSON, EDITOR
MINN GOVERNMENT REPORT
B-12 PRESS ROOM
STATE CAPITOL

DIR-DEVELOPMENTAL DIS-
ABILITIES PLANN OFF
200 CAPITOL SQ BLDG
ST PAUL, MN 55101

KENT EKLUND-COMMISSIONER
DEPT OF ECONOMIC DEV
480 CEDAR ST.
ST PAUL, MN 55101

JEROME E FRANKE
271 GRIGGS-MIDWAY BLDG
1821 UNIVERSITY AVE
ST PAUL, MN 55104

CONRAD FREDIN
ATTORNEY AT LAW
811 1ST NAT'L BANK BLDG
DULUTH, MN 55802

GOVERNMENT CNTR LIB
C-2359 GOVERNMENT CNTR
300 SOUTH 6TH ST
MPLS, MN 55487

LARRY HARRIS, COMM
RELATIONS-MPLS PUB SCH
807 NE BROADWAY
MPLS, MN 55413

R.J. LAVELL
DEPUTY COMMISSIONER
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MINN SCH OF REAL ESTATE
140 W 98TH ST
OXBORO PLAZA BLDG
BLOOMINGTON, MN 55420

PHILLIPS LEG SER INC
459 RICE ST
ST PAUL, MN 55103

PETER POPOVICH-PETERSON-
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314 MINNESOTA BLDG
ST PAUL, MN 55101

BRUCE T ROWE
COMM HEALTH SER BOARD
325 LAKE AV SO-SUITE 604
DULUTH, MN 55802

CHARLES SCHAFFER
DEPT-ECONOMIC DEVELOP.
480 CEDAR ST
ST PAUL, MN

DOMINIC SPOSETO
MINN DENTAL ASSO
2236 MARSHALL AVE
ST PAUL, MN 55104

M.S. SCHUMACHER
MPLS TRIBUNE
425 PORTLAND AVE
MPLS, MN 55488

HELEN TYLER
MPLS PUBLIC SCH
254 UPTON AVE SO
MPLS, MN 55405

VERNON VICK, VOC DIR
ROSEVILLE AREA SCHOOLS
1251 W CO RD B-2
ROSEVILLE, MN 55113

PETER JURKOVICH, VOC DIR
NORTHERN LITES COOP CNTR
LANCASTER PUBLIC SCHOOLS
LANCASTER MN 56735

WALT FEDERSON, VOC DIR
NORTH STAR VOCATIONAL
509 3RD ST. N.E.
BOSFAU MN 56751

JEAN HANSON, VOC DIR
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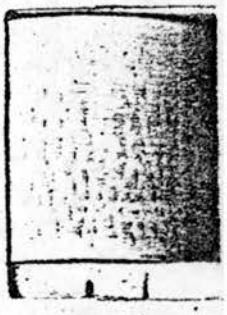
RED LAKE FALLS PUB SCH
RED LAKE FALLS MN 56750

CLEM STAPLETON, VOC DIR
PRAIRIE LAKES COOP CNTR
2011 NOBLES ST-PO BOX 48
WORTHINGTON MN 56187



BILL KOSITZKY, VOC DIR
REDWOOD VOC COOP CENTER
CLIFFWOOD PLAZA, BOX 421
REDWOOD FALLS, MN 56283

DON LAUMB, VOC DIR
RIVER VALLEY COOP CNTR
RUSHFORD HS - 102 N MILL
RUSHFORD MN 55971

KATHRYN STUART, DIR
SEC VOC ED - ST. PAUL
360 COLBORNE ST.
ST. PAUL MN 55102

KEN ROETZEL, VOC DIR
SHETEK COOP CENTER
WESTBROOK ELEM SCHOOL
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DONALD FREDERICK-VOC DIR
SOUTHERN MINN COOP CNTR
125 S BROADWAY - BOX 189
WELLS MN 56097

ROBERT JOHNSON, VOC DIR
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BARNUM MN 55707

WILLIAM KOSITZKY-VOC DIR
212 COOP CENTER
701 S. 9TH ST.
OLIVIA MN 56277

ED FIER, VOC DIR
VIKING COOP CENTER
BOX 23
HANSKA MN 56041

JAMES HOFER, VOC DIR
WOODLAND COOP CENTER
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STAPLES MN 56479

ROGER JOHNSON, VOC DIR
WRIGHT COOP CENTER
HWY 25
BUFFALO MN 55313

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CROOKSTON REGIONAL
425 WOODLAND AVE.
CROOKSTON MN 56716

KENNETH RUNBERG, DIR
CROW RIVER SP ED COOP
30 GLEN ST N
HUTCHINSON MN 55350



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DASSEL-COKATO PUB SCH
COKATO MN 55321

KENNETH MALKOVICH, DIR
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CHISHOLM MN 55719

RICK LUBANSKY, DIR
MN VALLEY INTERDISTRICT
SOUTHVIEW ELEM SCH
WACONIA MN 55387

ERIC LARSON, DIR
MOWER ED SERVICE COOP
BROWNDALE ELEM SCH
BROWNDALE MN 55918

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ORTHWEST VOC COOP CNTR
EH & LA BREE
HIEF RVR FALLS MN 56701

CD HAGEN, VOC DIR
ED RIVER VALLEY HS COOP
505 CENTRAL AVE NW
GRAND FORKS MN 56721

OM MOORE, VOC DIR
UM RIVER COOP CENTER
25 FOREST AVE.
ICRA MN 55051

AVE CZECH, VOC DIR
IBLEY COUNTY COOP CNTR
OX 304
RLINGTON MN 55307

ON RUBADO, VOC DIR
RI-COUNTY COOP CENTER
.O. BOX 657
KAND RAPIDS MN 55744

ATE JOHNSON, VOC DIR
ASECA CO COOP CENTER
09 8TH AVE NE
ASECA MN 56093

UANE CHRISTENSEN, DIR
EMIDJI RGNL INTER-
DIST COUNCIL - BOX 571
EMIDJI MN 56601

RRIS LEABO, DIR
ERGUS FALLS SP ED COOP
00 FRIBERG AVE
ERGUS FALLS MN 56537

CHN RUSSELL, DIR
ID-STATE COOP CENTER
09 N.E. SECOND AVE.
ITTLE FALLS MN 56345

ARRELL PETERSON
W REGNL I.D. COUNCIL
OX 57
EWFOLDEN MN 56738

A. ANDERSON, VOC DIR
AKLAND VOC COOP CENTER
430 NW 8TH ST
CAMBRIDGE MN 55008

MILO MC COY, VOC DIR
RED ROCK RIDGE COOP
P.O. BOX C-177
WINDOM MN 56101

DON BLUHM, VOC DIR
RUNESTONE COOP CENTER
2910 S. BROADWAY
ALEXANDRIA MN 56308

CARL MONTZKA, VOC DIR
SOUTH CENTRAL COOP CNTR
304 N. MAIN ST.
BLUE EARTH MN 56013

DENNIS THUREEN, VOC DIR
TRI-RIVER COOP CENTER
224 E. BRIDGE AVE
WARREN MN 56762

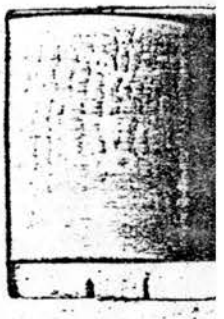
CARL E PUTNAM, VOC DIR
WEST CENTRAL VOC COOP CT
316 4TH ST - BOX 150
MADISON MN 56256

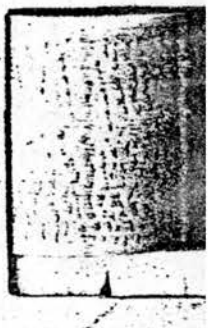
MICHAEL LEIGH DIR
BENTON STEARNS SP ED
570 FIRST ST. SE
ST CLOUD MN 56301

ED HANLON, DIR
MARTIN CO SP ED COOP
714 VICTORIA
FAIRMONT MN 56031

NEDRA MAHANEY, DIR
MN RIVER VALLEY SP ED
405 1ST AVE NW
NEW PRAGUE MN 56071

BILL MAKINEN, DIR
RIVER BEND SP SERVICES
412 N MINN ST.
NEW ULM MN 56073





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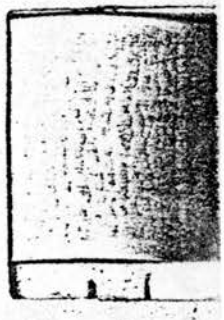
RGN I ACCT. COORD.
801 4TH AVE. S
MOORHEAD MN 56560

MARV ROBERTS
RGN II ACCT. COORD.
LAKE AVE - 2ND STREET
DULUTH MN 55805

ARLO SWANSON RGN V
P.O. BOX 1908
360 PIERCE AVENUE
NORTH MANKATO MN 56001

DON JACOBSON-RGN VI
METRO II
360 COLBORNE
ST. PAUL MN 55102



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109 S. FREEMAN AVE.
LUVERNE MN 56156

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HIGHWAY 55
PAYNESVILLE MN 56362

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MORRIS MN 56267

E. J. SHUKLE - VOC DIR
CROW RIVER COOP CENTER
BOX 67
HUTCHINSON, MN 55350

ROGER WENSCHLAG-VOC DIR
DAKOTA COUNTY VOC CNTR
P.O. DRAWER K-145TH ST E
ROSEMOUNT MN 55068

CLIFF WIKLUND - VOC DIR
DULUTH PUBLIC SCHOOLS
1217 RICE LAKE RD
DULUTH MN 55811

VOCATIONAL DIRECTOR
EAST CENTRAL COOP CNTR
P.O. BOX 102
SANDSTONE MN 55072

RON ERPELDING, VOC DIR
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P.O. BOX 1097
WILLMAR MN 56201

JIM HOFER
VOC. DIR.
BOX 322
PINE RIVER MN 56474

CLIFF CLAUSEN, VOC DIR
LAKES COOP CENTER
425 BROADWAY
DETROIT LAKES MN 56501

VOCATIONAL DIRECTOR
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221 HARRY-RICH DRIVE
WADENA MN 56482



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

HARVEY RUCKER, VOC DIR
MPLS PUBLIC SCHOOLS
807 NE BROADWAY
MPLS MN 55413

ALAN FLETCHER, VOC DIR
916 VOCATIONAL CENTER
3300 CENTURY AVE. N.
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BOBBY HANSON-IV ACCT COOR
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SOUTHWEST STATE UNIV.
MARSHALL MN 56258

AN PARKER
EGION VII - TIES
925 N CO RD B-2
OSEVILLE MN 55113

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AGASSIZ VALLEY COOP CNTR
415 JACKSON
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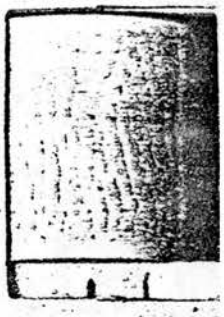

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416 S. SIBLEY
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ERRY FOLSTROM - VOC DIR
LAY CO. VOC. CNTR
323 16TH AVE S.
CORHEAD MN 56560

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R.R.2, BOX 83AA
SPRINGFIELD MN 56087

ILO MC COY - VOC DIR
ES MOINES VALLEY COOP
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GERRIE DRIESSEN, VOC DIR
DIST 11-ED SER CENTER
11299 HANSON BLVD, NW
COON RAPIDS MN 55433

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TH AVE, TECHNICAL BLDG
IRGINIA MN 55792

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518 FRIBERG AVE
FERGUS FALLS MN 56537

AVID FREIBORG, VOC DIR
IGHLAND COOP CENTER
37 WILLOW
YLER MN 56178

RAY COLVIN, VOC DIR
INTERDISTRICT COOP CNTR
N HWY 22
ST PETER MN 56082

ILL SCHERER, VOC DIR
ARTIN COUNTY COOP CNTR
00 JOHNSON ST.
AIRMONT MN 56301

JOE FREEMAN, VOC DIR
MID STATE COOP CENTER
109 NE 2ND AVE.
LITTLE FALLS MN 56345



TAN HARGER, VOC DIR
INNESOTA RIVER VOC CNTR
03 13 W. MAIN
EW PRAGUE MN 56071

JACK POWELL, VOC DIR
MINN VALLEY COOP CNTR
450 9TH AVE
GRANITE FALLS MN 56241

OHN RAPHEAL, VOC DIR
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000 18TH ST.
CQUET MN 55720

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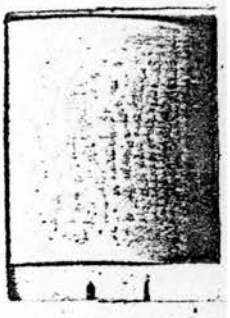
ELDON JOHNS DIRECTOR
AREA VOC TECH INSTITUTE
2101 TRINITY ROAD
DULUTH MN 55811

ROGER LEE
NORTH CAMPUS DIRECTOR
9000 NORTH 77TH AVENUE
BROOKLYN PARK MN 55445

JOHN LOBBEN
SECONDARY DIRECTOR
1820 NORTH XENIUM LANE
MINNEAPOLIS MN 55427

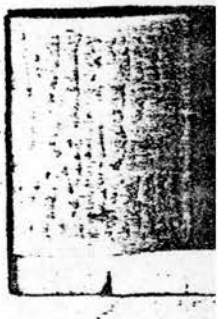
CHRIS SCHLEGEL, DIRECTOR
916 AREA VOC TECH INST.
3300 CENTURY AVE.
ST. PAUL, MN 55110



EUGENE JERECZEK, DIR
PROGRAM IMP & EVALUATION
1820 NORTH XENIUM LANE
MINNEAPOLIS MN 55427

ROBERT PAPAS
POST SECONDARY DIRECTOR
1820 NORTH XENIUM LANE
MINNEAPOLIS MN 55427

VACANCY, DIRECTOR
AREA VOC TECH INSTITUTE
PINE CITY, MN
55063



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VOC TECH INSTITUTE
2200 TECH DRIVE
ALBERT LEA MN 56007

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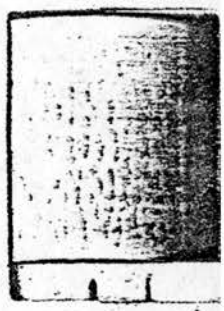

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916 VOC TECH INSTITUTE
3300 CENTURY AVENUE N
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AREA VOCATIONAL
TECHNICAL INSTITUTE
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VACANCY VOC DIR
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ST. PAUL MN 55102

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LYLE RAHN
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ANBY MN 56220

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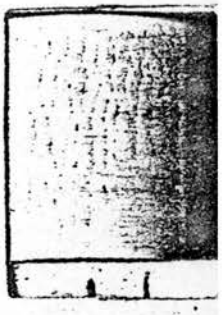

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SUB HENNEPIN VOC SCH
1820 NORTH XENIUM LANE
MINNEAPOLIS MN 55427

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AREA VOCATIONAL
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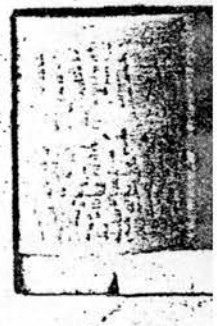

AROLD W GRUDEM SUPT
AKOTA COUNTY AVTI
OST OFFICE DRAWER K
OSEMOUNT MN 55064

HARLAN SHEELY
916 AREA VOC TECH INST.
3300 CENTURY AVE.
ST PAUL MN 55110

RON ROLLINS
DIR OF SPECIAL EDUCATION
ALBANY PUBLIC SCHOOLS
ALBANY MN 56307

ELLSWORTH STENSWICK
DIR OF SPECIAL EDUCATION
5220 W. 102ND STREET
BLOOMINGTON MN 55437



GRACE YOUNG
DIR OF SPECIAL EDUCATION
5900 HUMBOLDT AVENUE NO
BROOKLYN CENTER MN 55430

MARY TURNER
DIR OF PUPIL PERSONNEL
100 RIVER RIDGE COURT
BURNSVILLE MN 55337

CLIFFORD HOLMAN
DIR OF SPECIAL EDUCATION
CENTENNIAL PUB SCHOOLS
CIRCLE PINES MN 55014

DONALD JOHNSON
DIR OF SPECIAL EDUCATION
1400 49TH AVE NE
COLUMBIA HTS MN 55421

ROGER WHITCOMB
DIR OF SPECIAL EDUCATION
8040 - 80TH STREET SOUTH
COTTAGE GROVE MN 55016

MARCIA CARTHAUS
DIR OF SPECIAL EDUCATION
5555 W. 70TH ST.
EDINA MN 55435

DAN SULLIVAN
DIR OF SPECIAL EDUCATION
5TH & WALNUT STREETS
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DIR OF SPECIAL SERVICES
8025 SCHOOL ROAD
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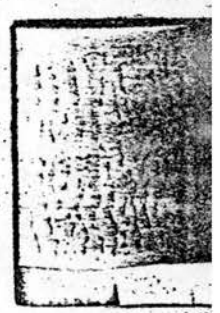


LOREN GRATZ
DIR OF SPECIAL SERVICES
9TH & VERMILLION
HASTINGS MN 55033

LOREN BENSON
DIR OF SPECIAL SERVICES
1001 STATE HIGHWAY 7
HOPKINS MN 55343

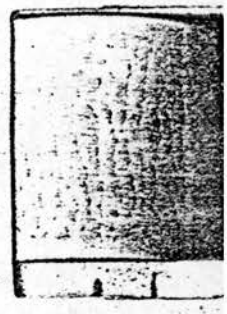
PAT BRESNAHAN
DIR OF SPECIAL SERVICES
21220 HOLYOKE AVE. W.
LAKEVILLE MN 55044

JOHN RUSSELL
DIR OF SPECIAL EDUCATION
109 NE SECOND AVENUE
LITTLE FALLS MN 56345

HOMAS MANGAN DIR SP ED
DUCATIONAL SERV CTR
1299 HANSON BLVD N.W.
ON RAPIDS MN 55433

MALCOLM MC DONALD
DIR OF SPECIAL EDUCATION
202 FOURTH AVENUE NE
AUSTIN MN 55912

NORMAN ANDRESEN
DIR OF SPECIAL EDUCATION
804 OAK STREET
BRAINERD MN 56401



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AMBRIDGE SR H.S.
30 N.W. 8TH
AMBRIDGE MN 55008

BOB DUNCAN
DIR OF SPECIAL EDUCATION
CHOSEN VALLEY ELEM SCH
CHATFIELD MN 55923

JS KOHLTS
IR OF SPECIAL EDUCATION
09 CARLTON AVENUE
LOQUET MN 55720

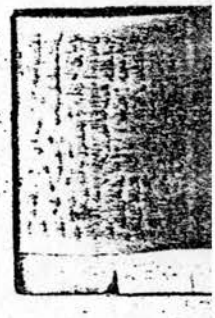
DIR OF SPECIAL EDUCATION
LAKE AVE, & 2ND ST.
DULUTH MN 55802

LENN HOLEMAN
IR OF SPECIAL EDUCATION
355 NW 1ST AVE-BOX 815
ARIBAULT MN 55021

AYNE STUTELBERG
IR OF SPECIAL EDUCATION
08 SW. 15TH ST
OREST LAKE MN 55025

D. JO GASCOLGNE
DIR OF SPECIAL SERVICES
6085-7TH ST NE.
FRIDLEY MN 55432

JULIE JACOBSEN
DIR OF SPECIAL EDUCATION
405 NINTH AVE.
GRANITE FALLS MN 56241



PHILLIP MOYE
DIR OF SPECIAL EDUCATION
9875 E INVER GROVE TRAIL
INVER GROVE HTS MN 55075

OM EMERY
IR OF SPECIAL EDUCATION
14 MAHTOMEDI AVE.
AHTOMEDI MN 55115

LYLE MC FARLING
DIR OF SPECIAL EDUCATION
51 PARK LANE
MANKATO MN 56001

UL ZEMKE
R OF SPECIAL EDUCATION
KWOOD ELEM SCHOOL
NTICELLO, MN 55362

AL SWEDBERG
DIR OF SPECIAL EDUCATION
810-4TH AVE S.
MOORHEAD MN 56560

RRY LITMAN, COOR.
ESTONKA SCHOOLS
00 LYNWOOD BLVD.
UND MN 55364

CAROL ERICSON
DIR OF SPECIAL SERVICES
2959 HAMLINE AVE NO
ST PAUL MN 55113



NALD WALDOCH
R OF SPECIAL EDUCATION
55 E LARPENTEUR AVE
RTH ST PAUL MN 55109

ALICE TUSETH
DIR OF SPECIAL SERVICES
317SECOND AVE NW
OSSEO MN 55369

VE LAMMERS
R OF SPECIAL EDUCATION
. SER. AREA, PO BOX 69
IPESTONE MN 56164

ROBERT MANNING
DIR OF SPECIAL EDUCATION
1820 XENIUM LANE NORTH
MPLS MN 55441

. VIRGINIA DIXON
R OF SPECIAL EDUCATION
34 SE. 16TH ST.
CHESTER MN 55901

JIM OMDAHL
DIR OF SPECIAL EDUCATION
14445 DIAMOND PATH WEST
ROSEMOUNT MN 55068

ICHARD HOLT
R OF SPECIAL EDUCATION
5-4TH AVE S.
T. CLOUD MN 56301

KEITH DAWSON
DIR OF SPECIAL SERVICES
6425 WEST 33RD ST.
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JOHN MESSELT
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SAUK CENTRE MN 56378

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R OF SPECIAL EDUCATION
APLES PUBLIC SCHOOLS
APLES MN 56479

HABIB KHAN
DIR OF SPECIAL SERVICES
6225 OASIS AVE. NO.
STILLWATER MN 55082



ULIE COOLIDGE
R OF SPECIAL EDUCATION
18 N. JEFFERSON
ADENA MN 56482

BARB DROLET
DIR OF SPECIAL EDUCATION
210 D STATE HWY 101 NO.
WAYZATA MN 55391

ARION PLAUDA
R OF SPECIAL EDUCATION
551 MCKNIGHT ROAD
HITE BEAR LAKE MN 55110

DR ARNIE REHMANN
DIR OF SPECIAL EDUCATION
254 UPTON SOUTH
MINNEAPOLIS MN 55405

MARGE LUKEHART
DIR OF SPECIAL EDUCATION
ALBERT LEA PUB SCHOOLS
ALBERT LEA MN 56007

KEN BURT
DIR OF SPECIAL EDUCATION
600 COLUMBIA AVENUE
MORRIS MN 56267



DONNA JOHNSON
DIR OF SPECIAL EDUCATION
MOUNTAIN IRON PUB SCH
MOUNTAIN IRON MN 55768

DARRELL PETERSON
DIR OF SPECIAL EDUCATION
P.O. BOX 57
NEWFOLDEN MN 56738

PAUL MOLSTRE
DIR OF SPECIAL EDUCATION
515 WEST BRIDGE ST.
CWATONNA MN 55060

GARY GERMANN
DIR OF SPECIAL EDUCATION
605 SIXTH STREET
PINE CITY MN 55063

RICHARD KAUFFMAN
DIR OF SPECIAL EDUCATION
70TH & HARRIET AVE SO
RICHFIELD MN 55423

PHYLLIS AMACHER
DIR OF SPECIAL EDUCATION
4148 WINNETKA AVE NO
MINNEAPOLIS MN 55427

JEANNE DORLE
DIR OF SPECIAL EDUCATION
1251 W COUNTY ROAD B-2
ROSEVILLE MN 55113

DUANE GOOGINS
DIR OF SP ED SERVICES
3303 33RD AVE. N.E.
MINNEAPOLIS MN 55418

CHARLES HAGEN
DIR OF SPECIAL EDUCATION
360 COLBORNE STREET
ST PAUL MN 55102

STAN MACK
DIR OF SPECIAL SERVICES
125 SIXTH AVE N.
SOUTH ST PAUL MN 55075

GLADYS MURRAY
DIR OF SPECIAL EDUCATION
8000 HIGHWAY 65 NO. E.
MINNEAPOLIS MN 55432



FRANCIS SPENCER
DIR OF SPECIAL EDUCATION
TECHNICAL BUILDING
VIRGINIA MN 55792

THOMAS HANSEN
DIR OF SPECIAL EDUCATION
WELLS PUBLIC SCHOOLS
WELLS MN 56097

FRED OJALA
DIR OF SPECIAL SERVICES
1037 BIDWELL ST
WEST ST PAUL MN 55118

CHARD BURKHARDT
R SP ED WASH KOSCIUKO
X 76 ST. THERESA HALL
NONA MN 55987

TERRY WALLACE
SPEC ED RGNL CONSULTANT
THIEF RVR FALLS PUB SCH
THIEF RVR FALLS MN 56701

TTY CHRISTENSON
IOT CENTER
00 CEDAR LAKE ROAD
LOUIS PARK MN 55426

ROBERT LARSON
SPEC ED RGNL CONSULTANT
ST LOUIS CO COURTHOUSE
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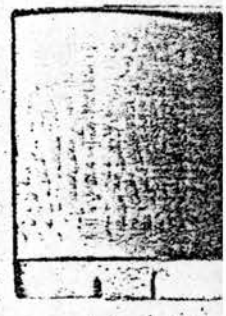

LIN BONSTROM
R OF SPECIAL SERVICE
299 HANSON BLVD NW.
ON RAPIDS MN 55433

DENNIS THORSEN
DIR OF SPECIAL EDUCATION
NEW ULM PUBLIC SCHOOL
NEW ULM MN 56073

RTIS THORSTENSON
R OF SP ED-DAK CO AVTI
DRAWER K
SEMOUNT MN 55068

JOHN HUTTMEIER
DIR OF SPECIAL EDUCATION
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BEMIDJI MN 56601

LT OTTE
R OF SPECIAL EDUCATION
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R. ERIC LARSON
DIR OF SPECIAL EDUCATION
BROWNDALE ELEM SCH
BROWNDALE MN 55918

CER
701 CHICAGO AVE
INNEAPOLIS MN 55407

AL BAAS
DIR OF SPECIAL EDUCATION
NORTH BRANCH SR HIGH
NORTH BRANCH MN 55056

ATRICIA WESTMAN
IR OF SPECIAL EDUCATION
09 THIRD ST NE.
OSEAU MN 56751

TOM NORRIS, DIRECTOR
PAWN SPECIAL EDU COOP
HUNTSINGER AVE
PARK RAPIDS MN 56470

MARTEE BUSHFIELD
DIR OF SPECIAL EDUCATION
121 E. THIRD ST.
CROOKSTON MN 56716



NTOINETTE JOHNS
IR OF SPEC SERVICES
300 CENTURY AVE N.
HITE BEAR LAKE MN 55110

OM MILLER
IR OF SPECIAL EDUCATION
55 OLD CRYSTAL BAY RD
ONG LAKE MN 55365

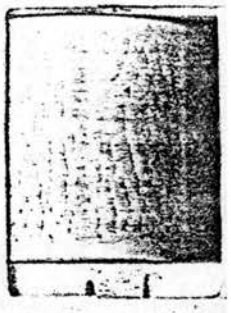
TOM TOUMI
DIR OF SPECIAL EDUCATION
REDLAKE PUBLIC SCHOOLS
REDLAKE MN 56671

BILL NAYLOR
DIR OF SPECIAL EDUCATION
611 WEST FIFTH STREET
WILLMAR MN 56201

FRANK DICRISTINA
DIR OF SPECIAL EDUCATION
1045 FOURTH AVENUE
WINDOM MN 56101

DENNIS BECCHETTI
SPEC ED RGNL CONSULTANT
139 EAST FIRST AVENUE
CAMBRIDGE MN 55008

WALLACE PIERCE
SPEC ED RGNL CONSULTANT
120 SOUTH VINE
FERGUS FALLS MN 56537



DAN BRYAN
SPEC ED RGNL CONSULTANT
9875 E. INVER GROVE TR.
INVER GROVE HTS MN 55075

JERRY ROBICHEAU
SPEC ED RGNL CONSULTANT
SOUTHWEST STATE UNIV.
MARSHALL MN 56258

ROBERT OLSON
DIR OF SPECIAL EDUCATION
AURORA PUBLIC SCHOOLS
AURORA MN 55705

SISTER CONRAD OSTRANDER
DIR OF SP ED CATH ED CTR
328 W. SIXTH ST
ST. PAUL MN 55102

JOHN LANGENBRUNNER
DIR OF SP ED, ADMIN BLDG
IND SCH DIST #361
INT'L FALLS MN 56649

DR LEO RUBERTO
DIR OF SPECIAL EDUCATION
THIEF RIVER FALLS PUB SC
THIEF RIV FALLS MN 56701

GENE BETTERMAN
DIR OF SPECIAL EDUCATION
8025 SCHOOL ROAD
EDEN PRAIRIE MN 55344

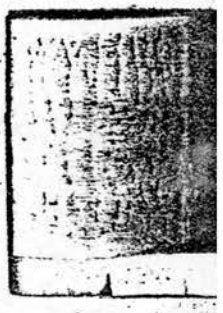
MILAN NELSON
DIR OF SPECIAL EDUCATION
261 SCHOOL AVE
EXCELSIOR MN 55331

STANLEY NERHAUGEN
DIR OF SPECIAL EDUCATION
525 EAST AVENUE
RED WING MN 55066

SUE BUTLER
DIR OF SPECIAL EDUCATION
MIDDLE SCHOOL
ST. FRANCIS MN 55070

JOHN BUTTS, DIRECTOR
3602 HIGH CREST RD NE.
SUITE 112
MINNEAPOLIS MN 55418

JOYCE HACKETT
PIERCE PLAZA, RM 209
360 PIERCE AVE
MANKATO MN 56001



TERRANCE PEARSON
DIR OF SPECIAL EDUCATION
TWO HARBORS HIGH SCHOOL
TWO HARBORS MN 55616

MS JUDY COLEY
DIR OF SPECIAL EDUCATION
MONTROSE ELEM SCHOOL
MONTROSE MN 55363

Asso of Metro School Districts
Executive Secretary
70[illegible] & Harriet Ave. So.
Richfield, MN 55423

Developmental Disabilities
State Planning Agency
Capitol Square Bldg.

gal Advocacy for Developmentally Disabled
2 Grain Exchange Bldg.
3 Fourth Ave. So.
nneapolis, MB 55415

MN Asso. for Children with Learning Disabilities
1821 University Ave.
St. Paul, MN 55104

MN Asso. for Sch. Administrators
President
Suite 350 - Hanover Bldg.
480 Cedar St.
St. Paul, MN 55101

Mpls., Asso. for Retarded Children
2344 Nicollett
Minneapolis, MN

Minnesota Asso of Retarded Citizens
president
3225 Lynda Ave. So.
Mpls., MN

Minn. Asso. of Sec. School Prin.
Executive Dir.
Suite 350 - Hanover Bldg.
480 Cedar St.
St. Paul, MN 55101

MN Comm. for the Handicapped
President
2527 Monterey Ave. So.
Mpls., MN 55416

MN Council for Handicapped
Executive Secretary
Room 208 Metro Square Bldg.

Minn. Education Asso
Executive Director
41 Sherburne Ave.
St. Paul, MN 55103

Minn. Elementary School Prin. Association
Executive Director
55 Sherburne Ave.
St. Paul, MN 55103

Minn. Federation of Teachers
175 Aurora Ave.
St. Paul, MN 55103

Minnesota School Boards Asso.
Box 119
St. Peter, MN 56082

Minn. Vocational Asso.
P.O. 16187
Elway Station
St. Paul, MN 55116

National Asso of Secondary School Principals
1904 Association Drive
Reston, Virginia 22091

MN Voc Asso of Sp Needs Personnel
Dakota County Vocational Center
P.O. Drawer K
145 St. E. & Akron Road
Rosemount, MN 55068

Sch. Administrators of Minn.
Hanover Bldg.
480 Cedar St.
St. Paul, MN 55101

United Cerebral Palsy
Griggs Midway Bldg.
1821 University Ave.
St. Paul, MN 55104

Will Antell, Asst. Commissioner
Special & Compensatory Ed.
802 Capitol Square

Roy Anderson
Special Education
802 Capitol Square

Dr. Gayle Anderson
Ed. Development Section
723 Capitol Square

George Blin
Pupil Transportation
9th Floor Capitol Square

Commissioner Casmey
7th Floor
Capitol Square

Erv Chorn
Ed. Data Systems
803 Capitol Square

Joan Gaetz
Special Education
802 Capitol Square

Mary Dolbotten
Education Media Unit

George Droubie
School Personnel Services
610 Capitol Square

Roger Delgehausen
School Personnel Services
613 Capitol Square

Joleen Durken
Education Development
7th Floor
Capitol Square

Larry Erie
Community Education
633 Capitol Square

Reynold Erickson
Pupil Personnel
631 Capitol Square

Gary Farland, Director
State Aids Section
915 Capitol Square

Bob Gramstad
Community Education
647 Capitol Square

Ron Dreyer
Vocational Education
551 Capitol Square

Mel Johnson
Vocational Education
548 Cap Square

Gerald Kleve
Assistant Commissioner
Division of Instruction
657 Capitol Square

Colleen Kish
School Personnel Services
614 Capitol Square

Floyd Keller
Planning & Evaluation
714 Capitol Square

Bob Kasper
Fiscal Services
7th Floor
Capitol Square

Dick Locke
Education Data Systems
803 Capitol Square

Ron Laliberte, Assistant
Commissioner
School Management Services
803 Capitol Square

Jim Lee, Director
Publications Section
8th Floor Capitol Square

Dan Loritz
Planning & Evaluation
7th Floor
Capitol Square

Don Modeen
Child Nutrition
508 Capitol Square

Ron Moir, Director
Financial Management
807 Capitol Square

Robert Madson, Director
Program Operations
Vocational Education
541 Capitol Square

Pete Moreno
Migrant Education
809 Capitol Square

Mary Lynne McAlonie
Special Education
802 Capitol Square

Leonard Nachman
Planning & Evaluation
717 Capitol Square

Gary Olsen
State Aids
915 Capitol Square

John Ostrem
Asst. To Deputy Commissioner
7th Floor Capitol Square

Phyllis Paul
Pupil Personnel Services
651 Capitol Square

Jerry Pavek
Director of Pupil Transport.
9th Floor Capitol Square

Don Pfiffner
State Aids Section
915 Capitol Square

Don Peterson
Community Education
664 Capitol Square

Ken Peatross
Board of Teaching
609 Capitol Square

E. Raymond Peterson
Associate Commissioner
709 Capitol Square

Patricia Strang
Monitoring
3rd Floor Capitol Square

Helen Smith
State Aids
915 Capitol Square

Stan Tikkanen
Sch. Financial Management
807 Capitol Square

Robert Van Tries
7th Floor
Capitol Square Bldg.

Von Valletta
Deputy Commissioner
7th Floor, Capitol Square

Bill White
Education Data Systems
803 Capitol Square

Shirlee Walker
6th Floor Capitol Square

Dr. Greg Waddick
Assistant Commissioner
Special Services
726 Capitol Square

Lowell Tornquist
Rm 718
Capitol Square

Sandy Hobson
Rm 710 Capitol Square

Barry Shaffer
Rm. 721 Capitol Square

Boni Pilapil
Rm 720 Capitol Square

John Comstock
Rm 720 Capitol Square

Diane Morehouse
Rm 721
Capitol Square

Marilyn Sorenson
Special Education
Rm 810 Capitol Square

John Maas
Deputy Commissioner
7th Floor, Capitol Square

Mary Honetschlager
Program Specialist - Art
Room 639 Capitol Square

Paul Day
Room 523 Capitol Square

Tricia Penn
Monitoring
3rd Floor Capitol Square

Joanne Carlson & Beth Sulliva
c/o Erv Chorn
8th Floor Capitol Square

Marilyn Mills
Professional Library
5th Floor Capitol Square

John Mercer
Rm 101 Capitol Square

Wayne Erickson
Rm. 802 Capitol Square

Norena Hale
Rm. 802 Capitol Square

Russ Andrews-Auditors Office
First Floor
Vets Building

Robert Ashbach
123 State Office Bldg.

Gary Bastian
Senate IRC
49 State Office Bldg.

Karen Baker
Room 17
Capitol Bldg.

Rey Boezi, Director
Human Resources Dept.
Metro Council
Metro Square Bldg.

Chief Clerk of the House
of Representatives
Room 211
Capitol Bldg.

Barbara Diamond
House Ed Committee
17E Capitol Bldg.

Dean Honetschlager
State Planning Agency
Rom 101 Capitol Square

Joyce Krupey
Senate Education Comm.
471 State Office Bldg.

Donna Knight
State Planning Agency
Room 101 Capitol Square

Steve Lindgren
110 State Office Bldg.

Legislators Auditors Office
Veterans Service Bldg.

Zona De Witt
Legislative Reference Library
Room 111 Capitol Bldg.

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Dept. of Finance
309 Administration Bldg.

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Capitol Bldg.

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Dept. of Economic Security
American Center Bldg.

Jim Cleary
House of Representatives
Room 17 Capitol Bldg.

Mike Bradley
Attorney General's Office
11th Floor Bremer Towers
7th & Minnesota
St. Paul, MN

Bill Asp
OPLIC
301 Hanover Bldg.

Donna Fortin-Schroeder
Head Start Advocate
Dept. of Economic Security
690 American Center Bldg.

Head of School
Blaine Christian Academy
1264 109th Avenue NE
Blaine, MN 55434

Head of School
Coon Rapids Christian School
11164 Hanson Blvd.
Coon Rapids, MN 55433

Head of School
Cross of Christ Lutheran
9931 Foley Blvd. NW
Coon Rapids, MN 55433

Head of School
Epiphany Education Center
11001 Hanson Blvd.
Coon Rapids, MN 55433

Head of School
Meadow Creek Christian
2937 Bunker Lake Blvd.
Anoka, MN 55303

Head of School
St. Stephen
506 Jackson Street
Anoka, MN 55303

Head of School
Faith Academy
4140 Fourth Street NE
Columbia Heights, MN 55421

Head of School
Immaculate Conception
4053 Quincy Street NE
Minneapolis, MN 55421

Head of School
Little Voyageur's Montessori
825 NE 51 Av,
Columbia Heights, MN 55421

Head of School
Grace High School
1350 Gardena Street NE
Fridley, MN 55432

Head of School
Kinderschule Montessori
61st Street & University NE
Fridley, MN 55421

Head of School
Woodcrest Christian
6875 University Avenue NE
Minneapolis, MN 55432

Head of School
St. Francis Christian School
Box 655
St. Francis, MN 55070

Head of School
Zion Lutheran
Route 2, Box 124
Bethel, MN 55005

Head of School
Grace Christian School
460 75th Avenue NE
Fridley, MN 55432

Head of School
Prince of Peace
7700 Monroe Street NE
Minneapolis, MN 55432

Head of School
Detroit Lakes Christian
1000 Lake Avenue
Detroit Lakes, MN 56501

Head of School
Northside Christian School
804 131st Ave. N.
Blaine, MN 55434

Head of School
Holy Rosary
1032 Washington Avenue
Detroit Lakes, MN 56501

Head of School
Seventh Day Adventist
404 Richwood Road
Detroit Lakes, MN 56501

Head of School
St. Philip
620 Beltrami Avenue
Bemidji, MN 56601

Head of School
Seventh Day Adventist
801 15th St.
Bemidji, MN 56601

Head of School
St. Mary's Mission
Redlake, MN 56671

Head of School
St. John
Box 56
Foley, MN 56329

Head of School
Sacred Heart
324 Third Avenue South
Sauk Rapids, MN 56379

Head of School
Trinity Lutheran
219 North Fourth Street
Sauk Rapids, MN 56379

Head of School
Big Stone Hutterite Colony
Graceville, MN 56240

Head of School
Trinity Lutheran
Box 144
Johnson, MN 56250

Head of School
St. John's Lutheran School
Box 37
Good Thunder, MN 56037

Head of School
St. John's Lutheran School
Route 1
Vernon Center, MN 56090

Head of School
Academy of Our Lady of
Good Counsel Hill
Mankato, MN 56001

Head of School
All Saints School
Madison Lakes, MN 56063

Head of School
Grace Christian School
6th Avenue & Lind Street
Mankato, MN 56001

Head of School
Holy Rosary School
546 Grant
North Mankato, MN 56001

Head of School
Immanuel Lutheran School
421 North Second Street
Mankato, MN 56001

Head of School
Loyola Fitzgerald
110 North Fifth Street
Mankato, MN 56001

Head of School
Mt. Olive Lutheran School
1123 Marsh Street
Mankato, MN 56001

Head of School
St. Joseph - St. John
Blue Earth & Hubbell Streets
Mankato, MN 56001

Head of School
St. Mark's Lutheran
Sibley & West 7
Mankato, MN 56001

Head of School
St. Peter & Paul
110 North Sixth Street
Mankato, MN 56001

Head of School
Wilson Community School
Box 3372
Mankato, MN 56001

Head of School
St. Paul School
Box 215
Comfrey, MN 56019

Head of School
Cathedral School
Washington & Sixth Street N.
New Ulm, MN 56073

Head of School
Central School
515 North State Street
New Ulm, MN 56073

Head of School
New Ulm Christian School
Third & Payne Streets
New Ulm, MN 56073

Head of School
St. George
Route 1
New Ulm, MN 56073

Head of School
St. Paul's Lutheran School
126 South Payne Street
New Ulm, MN 56073

Head of School
St. John's Evangelical Luth.
216 Third Avenue SE
Sleepy Eye, MN 56085

Head of School
St. Mary
104 West St. Mary's Street
Sleepy Eye, MN 56085

Head of School
School of Japanese Martyrs
Route 2, Box 111
Sleepy Eye, MN 56085

Head of School
St. Raphael
20 West Van Duesen
Springfield, MN 56087

Head of School
Our Lady of Sacred Heart
401 Avenue G
Cloquet, MN 55720

Head of School
St. Paul's Academy
18th & Wilson Avenue
Cloquet, MN 55720

Head of School
Guardian Angels
215 West Second Street
Chaska, MN 55318

Head of School
Minnesota Valley Lutheran
126 S. Payne St.
New Ulm, MN 56075

Head of School
Jonathan Montessori
Box 35
Chaska, MN 55318

Head of School
St. Hubert
306 78th Street West
Chanhassen, MN 55317

Head of School
St. John's Lutheran
Oak & 4th St.
Chaska, MN 55318

Head of School
Emanuel Lutheran School
Hamburg, MN 55339

Head of School
St. Bernard
Cologne, MN 55322

Head of School
St. John's Lutheran School
Box 66
Young America, MN 55397

Head of School
Zion Lutheran School
Route 1
Cologne, MN 55322

Head of School
St. Joseph
25 East First Street
Waconia, MN 55387

Head of School
St. Mark's & St. John's Luth.
Box 128
New Germany, MN 55367

Head of School
Trinity Lutheran School
601 East Second
Waconia, MN 55387

Head of School
Lutheran High School
Box 143
Mayer, MN 55360

Head of School
SS Peter & Paul
Box 656
Watertown, MN 55388

Head of School
Zion Lutheran School
Box 108
Mayer, MN 55360

Head of School
Bug-O-Nay-Ge-Shig

Cass Lake, MN 56633

Head of School
Daystar Christian School
Zion Harbor
Federal Dam, MN 56641

Head of School
Chisago Lakes Baptist Academy
Box 57
Chisago City, MN 55013

Head of School
Assumption
Barnesville, MN 56514

Head of School
Daystar Ministry
121 Sixth Avenue South
Moorhead, MN 56560

Head of School
St. Francis de Sales
1330 Eighth Avenue North
Moorhead, MN 56560

Head of School
St. Joseph
202 Tenth Street South
Moorhead, MN 56560

Head of School
Christian Day
710 North 11th Street
Mountain Lake, MN 56159

Head of School
Westbrook Christian School
Westbrook, MN 56183

Head of School
Lake Region Christian School
Highway 210 West, Box 428
Brainerd, MN 56401

Head of School
St. Francis of Assisi
817 Juniper Street
Brainerd, MN 56401

Head of School
Seventh Day Adventist
Box 491
Brainerd, MN 56401

Head of School
St. John the Baptist
12508 Lynn Avenue South
Savage, MN 55378

Head of School
Hastings Parochial
600 Tyler Street
Hastings, MN 55033

Head of School
St. John the Baptist
Vermillion, MN 55085

Head of School
Private Christian Liberty
Academy
Moose Lake, MN 55767

Head of School
St. Mary
Route 1
New Trier, MN 55033

Head of School
St. Mathias
Hampton, MN 55031

Head of School
All Saints
20950 Howland Ave West
Lakeville, MN 55044

Head of School
Berea Lutheran School
9308 Rich Valley Blvd.
Inver Grove Heights, MN 55075

Head of School
Rosemount Baptist School
14400 Diamond Path West
Rosemount, MN 55068

Head of School
St. Joseph School
14355 S. Robert Trail
Rosemount, MN 55068

Head of School
Heritage Christian School
1451 Stickney Street South
St. Paul, MN 55075

Head of School
Holy Trinity School
745 Sixth Avenue South
South St. Paul, MN 55075

Head of School
Providence School
19 Avenue N & Bromley
South St. Paul, MN 55075

Head of School
Faith Christian School
502 Hwy. 33 N.
Cloquet, MN 55720

Head of School
Jesus is Lord Academy
14675 Audrey Lane
Rosemount, MN 55068

Head of School
Archbishop Brady
1200 Oakdale Avenue
West St. Paul, MN 55118

Head of School
Convent of the Visitation
2475 Dodd Road
West St. Paul, MN 55120

Head of School
St. Croix Lutheran
110 Crusader Avenue
West St. Paul, MN 55118

Head of School
St. Joseph School
1138 Seminole Avenue
West St. Paul, MN 55118

Head of School
St. Michael
335 East Hurley
West St. Paul, MN 55118

Head of School
St. Thomas Academy
949 Mendota Heights Road
West St. Paul, MN 55120

Head of School
Trinity Lone Oak Lutheran
2950 Dodd Road
Eagan, MN 55121

Head of School
Emanuel Lutheran School
115 Crusader Avenue
West St. Paul, MN 55118

Head of School
St. Mary
Fifth & Hawthorne
Alexandria, MN 56308

Head of School
Zion Lutheran School
310 Lake Street
Alexandria, MN 56308

Head of School
St. Agnes School
307 Fourth Avenue West
Osakis, MN 56360

Head of School
Our Lady of Mt. Carmel
Box 128
Easton, MN 56025

Head of School
St. Casimir
330 Second Avenue SW
Wells, MN 56097

Head of School
St. John's Lutheran
Box 248
Wykoff, MN 55990

Head of School
Hollandale School
Box 182
Hollandale, MN 56045

Head of School
St. Paul's Lutheran School
1100 West Minnesota
Cannon Falls, MN 55009

Head of School
St. John's School
Route 3
Goodhue, MN 55027

Head of School
Concordia-Immanuel Lutheran
1805 Bush Street
Red Wing, MN 55066

Head of School
Our Redeemer's Lutheran
1534 West Avenue
Red Wing, MN 55066

Head of School
St. John's Lutheran School
421 East Avenue
Red Wing, MN 55066

Head of School
St. Joseph
Seventh & North Park
Red Wing, MN 55066

Head of School
Christ Evangelical Lutheran
223 East Fifth
Zumbrota, MN 55992

Head of School
Bethany Academy
6820 Auto Club Road
Minneapolis, MN 55438

Head of School
Mt. Hope-Redemption School
927 East Old Shakopee Road
Minneapolis, MN 55420

Head of School
Nativity of Mary
9901 Bloomington Freeway
Minneapolis, MN 55420

Head of School
Town & Country Montessori
10313 Stanley Circle
Bloomington, MN 55437

Head of School
Chapel Hill Academy, Inc.
17850 Duck Lake Terrace
Eden Prairie, MN 55344

Head of School
New Testament Christian
12901 Valley View Road
Eden Prairie, MN 55344

Head of School
Calvin Christian School
4015 Inglewood Avenue South
Minneapolis, MN 55416

Head of School
Concy's Montessori
4801 France Avenue South
Minneapolis, MN 55410

Head of School
Edina Montessori School
4501 Colfax Avenue South
Minneapolis, MN 55401

Head of School
Our Lady of Grace School
5051 Eden Avenue
Minneapolis, MN 55436

Head of School
St. Peter's Lutheran School
5421 France Avenue South
Edina, MN 55410

Head of School
Good Shepherd Middle School
145 Jersey Avenue South
Minneapolis, MN 55426

Head of School
Blake Schools (Grades K-5)
110 Blake Road
Hopkins, MN 55343

Head of School
Blake Schools (Grades 6-8)
110 Blake Road
Hopkins, MN 55343

Head of School
Groves Learning Center
2000 Hopkins Crossroad
Minnetonka, MN 55343

Head of School
Hopkins Consolidated School
1320 Excelsior Avenue West
Hopkins, MN 55343

Head of School
Bloomington Lutheran School
10600 Bloomington Ferry Rd.
Bloomington, MN 55438

Head of School
Hopkins Montessori
4215 Fairview Avenue
Minnetonka, MN 55343

Head of School
Immaculate Heart of Mary
13505 Excelsior Blvd.
Minnetonka, MN 55343

Head of School
Minneapolis Jr. Academy
3500 Williston Road
Hopkins, MN 55343

Head of School
Annunciation School
525 West 54th Street
Minneapolis, MN 55419

Head of School
Ascension School
1726 Dupont Avenue North
Minneapolis, MN 55411

Head of School
Blake Schools (Grades 9-12)
511 Kenwood Parkway
Minneapolis, MN 55403

Head of School
Breck School
4200 West River Road
Minneapolis, MN 55406

Head of School
Bryant Avenue Baptist School
5601 Bryant Avenue South
Minneapolis, MN 55419

Head of School
Child Garden Total Envirnment
900 Mt. Curve Avenue
Minneapolis, MN 55403

Head of School
Christ the King School
3210 West 51st
Minneapolis, MN 55410

Head of School
De La Salle School
25 West Island Avenue
Minneapolis, MN 55401

Head of School
Fourth Baptist Christian
2105 Fremont Avenue North
Minneapolis, MN 55411

Head of School
Heart of Earth Survival
1209 Fourth Street SE
Minneapolis, MN 55414

Head of School
Holy Rosary
2430 18th Avenue South
Minneapolis, MN 55404

Head of School
Immanuel Lutheran School
2201 Girard Avenue North
Minneapolis, MN 55411

Head of School
Incarnation School
3800 Pleasant Avenue South
Minneapolis, MN 55409

Head of School
Day Community
308 15 Av., SE
Minneapolis, MN 55414

Head of School
Operation De Novo
321 3 St S
Mpls, MN 55404

Head of School
Lake Country School
1601 Laurel Avenue
Minneapolis, MN 55403

Head of School
Minneapolis Lutheran School
4242 Wentworth Avenue South
Minneapolis, MN 55409

Head of School
Minnehaha Academy
3107 47th Avenue South
Minneapolis, MN 55406

Head of School
Nokomis Montessori
5300 Tenth Avenue South
Minneapolis, MN 55419

Head of School
Northeast Regional Ed. Center
Holy Cross, 1630 Fourth St.NE
Minneapolis, MN 55413

Head of School
Northeast Regional Ed. Center
St. Cyril School
229 13th Avenue NE
Minneapolis, MN 55413

Head of School
Our Lady of Victory School
5140 Fremont Avenue North
Minneapolis, MN 55430

Head of School
Pilgrim Lutheran School
3901 First Avenue South
Minneapolis, MN 55409

Head of School
Powderhorn Christian School
4500 Clinton Av. S,
Minneapolis, MN 55409

Head of School
Regina School
4225 Third Avenue South
Minneapolis, MN 55409

Head of School
Resurrection School
5435 11th Avenue South
Minneapolis, MN 55417

Head of School
St. Albert the Great
2840 33rd Avenue South
Minneapolis, MN 55406

Head of School
St. Anne
2620 Russell Avenue North
Minneapolis, MN 55411

Head of School
St. Austin
4021 Thomas Avenue North
Minneapolis, MN 55412

Head of School
St. Bridget
3820 Emerson Avenue North
Minneapolis, MN 55412

Head of School
St. John's Lutheran School
610 NE Broadway
Minneapolis, MN 55413

Head of School
St. Kevin
59th Street & 27th Avenue S.
Minneapolis, MN 55417

Head of School
St. Stephen
2123 Clinton Avenue South
Minneapolis, MN 55404

Head of School
St. Thomas the Apostle
2900 West 44th Street
Minneapolis, MN 55410

Head of School
Second Foundation School
1219 University Avenue SE
Minneapolis, MN 55414

Head of School
Soul's Harbor
230 Nicollet Mall
Minneapolis, MN 55401

Head of School
South Parks Consolidated
1120 East 37th Street
Minneapolis, MN 55407

Head of School
Southside Family
2647 Bloomington Avenue So.
Minneapolis, MN 55407

Head of School
Trinity First Lutheran
1115 East 19th Street
Minneapolis, MN 55404

Head of School
Visitation
4530 Lyndale Avenue South
Minneapolis, MN 55409

Head of School
Katahdin School
23 SE 4th St.
Minneapolis, MN 55414

Head of School
Deephaven Montessori
18325 Minnetonka Blvd.
Wayzata, MN 55391

Head of School
Home Covenant School
5570 Covington Road
Excelsior, MN 55331

Head of School
Calvary Memorial Church Sch.
2420 Dunwoody Ave.
Wayzata, 55391

Head of School
Minnetonka Montessori
233 School Ave.
Excelsior, MN 55331

Head of School
St. John the Baptist School
638 Mill Street South
Excelsior, MN 55331

Head of School
St. Therese
18325 Minnetonka Blvd.
Wayzata, MN 55391

Head of School
Our Lady of the Lake School
2411 Commerce Blvd.
Mound, MN 55364

Head of School
Holy Name of Jesus School
155 County Road 24
Wayzata, MN 55391

Head of School
Brookdale Christian Center
6030 Xerxes Avenue North
Brooklyn Center, MN 55430

Head of School
St. Alphonsus School
71st & Halifax Avenue North
Minneapolis, MN 55429

Head of School
St. John's Lutheran School
9141 Highway 101
Osseo, MN 55369

Head of School
Seventh Day Adventist
4849 East Main,
Maple Plain, MN 55359

Head of School
St. Vincent de Paul School
600 First Avenue NW
Osseo, MN 55369

Head of School
Faith Home School
19800 Manor Road
Excelsior, MN 55331

Head of School
Academy of Holy Angels
6600 Nicollet Avenue South
Minneapolis, MN 55423

Head of School
Assumption
305 East 77th Street
Richfield, MN 55423

Head of School
Fraser School, Inc.
2400 West 64th Street
Minneapolis, MN 55423

Head of School
Mt. Calvary Lutheran School
6541 16th Avenue South
Minneapolis, MN 55423

Head of School
St. Peter
6720 Nicollet Avenue South
Minneapolis, MN 55423

Head of School
St. Richard
7540 Penn Avenue South
Minneapolis, MN 55423

Head of School
Plymouth Christian School
13030 47th Avenue North
Minneapolis, MN 55442

Head of School
Sacred Heart School
4050 Hubbard Avenue North
Minneapolis, MN 55422

Head of School
St. Margaret Mary School
2225 Zenith Avenue North
Minneapolis, MN 55422

Head of School
St. Raphael School
5501 Nevada Avenue North
Crystal, MN 55428

Head of School
St. Charles Borromeo School
2727 Stinson Blvd. NE
Minneapolis, MN 55418

Head of School
Benilde-St. Margaret School
2501 Highway 100 South
Minneapolis, MN 55416

Head of School
Discoveries for Children
Vernon & 41st Street
St. Louis Park, MN 55418

Head of School
Edina Montessori School, Inc.
4003 Wooddale Avenue South
St. Louis Park, MN 55416

Head of School
Golden Years' Montessori
3700 Alabama Avenue
St. Louis Park, MN 55416

Head of School
Holy Family School
5925 West Lake Street
Minneapolis, MN 55416

Head of School
Metropolitan Open School
41st & Vernon Avenue South
St. Louis Park, MN 55416

Head of School
Most Holy Trinity
3946 Wooddale Avenue South
Minneapolis, MN 55416

Head of School
Timothy Lutheran School
7814 Minnetonka Blvd.
Minneapolis, MN 55426

Head of School
Torah Academy
8200 West 33rd
St. Louis Park, MN 55426

Head of School
Blake Schools (Grades K-6)
301 Peavey Lane
Wayzata, MN 55391

Head of School
Minnetonka Montessori
705 Highway 101 North
Wayzata, MN 55391

Head of School
Redeemer Lutheran School
115 West Wayzata Blvd.
Wayzata, MN 55391

Head of School
St. Bartholomew School
645 East Rice Street
Wayzata, MN 55391

Head of School
St. John's Lutheran School
720 North Marshall
Caledonia, MN 55921

Head of School
St. Mary
318 East South Street
Caledonia, MN 55921

Head of School
Crucifixion
420 Second Street South
La Crescent, MN 55947

Head of School
St. Peter
Box 357
Hokah, MN 55941

Head of School
MN Assoc. of Private Schools
Nevis, MN 56467

Head of School
Park Rapids First Baptist
Christian School
Park Rapids, MN 56470

Head of School
Grasston Christian
Academy
Grasston, MN 55030

Head of School
Calvary Bible Academy
Box 336
Cambridge, MN 55008

Head of School
Seventh Day Adventist School
Route 2, Box 95
Cambridge, MN 55008

Head of School
Christian Community School
510 Golf Course Road
Grand Rapids, MN 55744

Head of School
St. Joseph School
614 North Second Avenue West
Grand Rapids, MN 55744

Head of School
Frontier Farm School
Route 1, Box 36
Effie, MN 56639

Head of School
Immanuel Lutheran School
620 Bush Street
Lakefield, MN 56150

Head of School
St. Paul's Lutheran School
Route 3
Lakefield, MN 56150

Head of School
Nature's Way
Box 47
Middle River, MN 56737

Head of School
St. Philip School
225 East Third Street
Litchfield, MN 55355

Head of School
Central Lutheran School
300 Northeast 16th Street
Austin, MN 55912

Head of School
Community Christian School
Box 68
Pease, MN 56363

Head of School
Faith Christian School
Oakland, Mn 55912

Head of School
St. Paul's Lutheran School
Route 1
Ceylon, MN 56121

Head of School
Crosier Seminary Prep.
Onamia, MN 56359

Head of School
Pacelli School
311 Northwest Fourth Street
Austin, MN 55912

Head of School
Fairmont Christian School
1345 Albion Avenue
Fairmont, MN 56031

Head of School
North Star Christian Academy
400 East Broadway
Little Falls, MN 56345

Head of School
Queen of Angels
912 First Avenue Northeast
Austin, MN 55912

Head of School
St. James Lutheran School
Box 305
Northrop, MN 56075

Head of School
Our Lady of Lourdes School
205 Northwest Third Street
Little Falls, MN 56345

Head of School
St. Augustine-St. Edward
511 Fourth Avenue Northwest
Austin, MN 55912

Head of School
St. John Vianney School
901 South Prairie Avenue
Fairmont, MN 56031

Head of School
St. Mary
307 Southeast Fourth Street
Little Falls, MN 56345

Head of School
St. Paul's Lutheran
106 9 Place Southwest
Austin, MN 55912

Head of School
St. Paul's Lutheran School
201 Oxford Street
Fairmont, MN 56031

Head of School
St. John Nepomuk School
Lastrup, MN 56344

Head of School
Sacred Heart School
Adams, MN 55909

Head of School
St. Paul's Lutheran School
114 East Fourth Street North
Truman, MN 56088

Head of School
St. Joseph School
Pierz, MN 56364

Head of School
Chandler Christian School
Box 125B
Chandler, MN 56122

Head of School
St. Anthony School
Box 469
Watkins, MN 55389

Head of School
St. Michael School
Buckman, MN 56317

Head of School
St. Paul's Lutheran School
Box 394
Fulda, MN 56131

Head of School
Austin Christian Academy
301 Southwest Fourth Street
Austin, MN 55912

Head of School
Immanuel Lutheran School
Route 1
Courtland, MN 56021

Head of School
Nay-Ah-Shing School
Star Route
Onamia, MN 56359

Head of School
St. John's Lutheran School
Route 2
Atwater, MN 56209

Head of School
Central Minnesota Christian
Box 98
Prinsburg, MN 56281

Head of School
Christian Community School
Highway 23
Willmar, MN 56201

Head of School
Heritage School
Karlstad, MN 56732

Head of School
St. Thomas Aquinas School
Box 712
International Falls, MN
56649

Head of School
Seventh Day Adventist School
Loman Route 7
International Falls, MN
56649

Head of School
St. Michael School
318 Fifth Avenue
Madison, MN 56256

Head of School
St. Anne School
511 North Fourth
LeSueur, MN 56058

Head of School
Holy Redeemer School
205 Vine Avenue West
Montgomery, MN 56069

Head of School
Lonsdale Consolidated School
Lonsdale, MN 55046

Head of School
Buffalo Ridge Accelerated
Christian Academy
Lake Benton, MN 56149

Head of School
St. Peter
Box 112
Balaton, MN 56115

Head of School
Samuel School of Christ
500 Village Drive
Marshall, MN 56258

Head of School
Holy Redeemer School
501 South Whitney
Marshall, MN 56258

Head of School
St. Edward School
Fourth & Washington Street
Minneota, MN 56264

Head of School
St. Eloi School
Ghent, MN 56239

Head of School
St. Mary School
225 Sixth Street
Tracy, MN 56175

Head of School
First Evangelical Lutheran
1015 14th Street East
Glencoe, MN 55336

Head of School
St. Pius X
1103 East Tenth Street
Glencoe, MN 55336

Head of School
Hutch ABC
Box 476
Hutchinson, MN 55350

Head of School
Immanuel Lutheran School
Route 3
Hutchinson, MN 55350

Head of School
Maplewood Academy
700 North Main Street
Hutchinson, MN 55350

Head of School
Our Savior's Lutheran
800 North Bluff Street
Hutchinson, MN 55350

Head of School
St. Anastasia School
400 Lake Street
Hutchinson, MN 55350

Head of School
St. John's Lutheran School
Route 4
Hutchinson, MN 55350

Head of School
Silver Lake Catholic School
Silver Lake, MN 55381

Head of School
Holy Trinity School
110 Winsted Avenue West
Winsted, MN 55395

Head of School
St. Michael School
Route 1, Box 23
Mahnomen, MN 56557

Head of School
St. Rose of Lima
Box 825
Argyle, MN 56713

Head of School
Trinity Lutheran School
Box 387
Nicollet, MN 56074

Head of School
John Ireland School
618 South Fifth Street
St. Peter, MN 56082

Head of School
Norseland Lutheran School
Route 3, Box 40
St. Peter, MN 56082

Head of School
St. Anthony & St. Kilian
Lismore, MN 56155

Head of School
Calvary Christian School
Box 383, 1401 Fourth Avenue
Worthington, MN 56187

Head of School
Faith Christian School
Box 38
Bigelow, MN 56117

Head of School
St. Mary
12th Street & 8th Avenue
Worthington, MN 56187

Head of School
Worthington Christian
1118 Johnson Avenue
Worthington, MN 56187

Head of School
Worthington Montessori
230 Clary Street
Worthington, MN 56187

Head of School
Faith Christian School
2810 Southeast 40th Avenue
Rochester, MN 55901

Head of School
Seventh Day Adventist
75 at Dresser Drive NE
Rochester, MN 55901

Head of School
Lourdes
Center St. & 7th Ave. W.
Rochester, MN 55901

Head of School
Montessori Child Dev. Center
4435 Bamber Valley Road SW
Rochester, MN 55901

Head of School
Resurrection Lutheran
407 14th Street Northwest
Rochester, MN 55901

Head of School
Rochester Central Lutheran
2619 Ninth Avenue Northwest
Rochester, MN 55901

Head of School
Rochester Christian School
921 37th Street Northwest
Rochester, MN 55901

Head of School
Rochester Montessori
2211 Salem Road Southwest
Rochester, MN 55901

Head of School
St. Francis School
318 11th Avenue Southeast
Rochester, MN 55901

Head of School
St. John
420 West Center
Rochester, MN 55901

Head of School
St. Pius X
14th Street & 12th Avenue NW
Rochester, MN 55901

Head of School
New York Mills Christian
103 Hayes Ave.
New York Mills, MN 56567

Head of School
Stewartville Christian
500 Southeast First Avenue
Stewartville, MN 55976

Head of School
Hillcrest Lutheran Academy
Box 317
Fergus Falls, MN 56537

Head of School
Our Lady of Victory
426 West Cavour
Fergus Falls, MN 56537

Head of School
St. John's Lutheran School
Route 1
Ottertail, MN 56571

Head of School
Seventh Day Adventist
Box 84'
Clitherall, MN 56524

Head of School
St. Henry School
253 Second Street Southwest
Perham, MN 56573

Head of School
St. Paul's Lutheran School
560 Second Street Southwest
Perham, MN 56573

Head of School
St. Bernard School
117 Knight Avenue North
Thief River Falls, MN 56701

Head of School
Seventh Day Adventist
1004 South Tindolph
Thief River Falls, MN 56701

Head of School
St. Mary School
815 West Sixth Avenue
Pine City, MN 55063

Head of School
Kingsway
Thief River Falls, MN 56701

Head of School
Edgerton Christian School
Box 236
Edgerton, MN 56128

Head of School
Free Christian School
Box 431
Edgerton, MN 56128

Head of School
Leota Christian School
501 E. Main
Leota, MN 56153

Head of School
Southwest Christian School
451 Elizabeth Street West
Edgerton, MN 56128

Head of School
Seventh Day Adventist School
Holland, MN 56139

Head of School
Crookston Catholic School
220 East Third Street
Crookston, MN 56716

Head of School
Mt. St. Benedict Academy
East Summit Avenue
Crookston, MN 56716

Head of School
Bible Baptist School
310 Fifth Avenue North
East Grand Forks, MN 56721

Head of School
Sacred Heart School
126 Third Street Northwest
East Grand Forks, MN 56721

Head of School
Gladstone Christian Academy
1717 English St.
St. Paul, MN 55109

Head of School
River Heights Lutheran
1708 River Road NW
East Grand Forks, MN 56721

Head of School
Northside Christian School
7901 Red Oak Drive NE
Minneapolis, MN 55432

Head of School
Harbon Montessori
Long Lake Road & Highway 694
St. Paul, MN 55412

Head of School
Oak Hill Montessori
4665 Hodgson Road
St. Paul, MN 55112

Head of School
St. John the Baptist School
845 Second Avenue Northwest
New Brighton, 55112

Head of School
St. Odilia School
3495 North Victoria Street
St. Paul, MN 55112

Head of School
Capitol City School
1220 South McKnight
St. Paul, MN 55119

Head of School
Christ Lutheran School
2475 East 17th Avenue
North St. Paul, MN 55109

Head of School
Gethsemane School
2410 Stillwater Road
St. Paul, MN 55119

Head of School
Hill-Murray School
2625 East Larpenteur Avenue
St. Paul, MN 55109

Head of School
Little School of Montessori
Frost & Mantor
Maplewood, MN 55109

Head of School
Presentation of the Blessed
Virgin Mary
1725 Kennard Street
St. Paul, MN 55109

Head of School
St. Peter School
2620 North Margaret Street
North St. Paul, MN 55109

Head of School
Transfiguration School
953 Ferndale Avenue
St. Paul, MN 55119

Head of School
Walther Jr. High School
2410 Stillwater Road
St. Paul, MN 55119

Head of School
Concordia Academy
2400 North Dale Street
St. Paul, MN 55113

Head of School
Corpus Christi School
2131 North Fairview
St. Paul, MN 55113

Head of School
Kinderhaus Montessori
Fernwood & Ryan
Roseville, MN 55113

Head of School
King of Kings Lutheran
2330 North Dale Street
St. Paul, MN 55113

Head of School
St. Jerome School
384 East Roselawn Avenue
St. Paul, MN 55117

Head of School
St. John the Evangelist
2621 McMenemy Road
St. Paul, MN 55117

Head of School
St. Rose of Lima School
2072 Hamline Avenue North
St. Paul, MN 55113

Head of School
Bethune Montessori
440 University Avenue
St. Paul, MN 55103

Head of School
Blessed Sacrament School
1800 Ames Avenue
St. Paul, MN 55119

Head of School
Cathedral Montessori
328 West ~~Kellogg~~ 6 St
St. Paul, MN 55102

Head of School
Central Lutheran School
775 North Lexington Parkway
St. Paul, MN 55104

Head of School
Cheder of St. Paul
15 Montcalm Court
St. Paul, MN 55116

Head of School
Krueger Christian
1630 E. Geranium
St. Paul, MN 55106

Head of School
Children's Center Montessori
1536 West Minnehaha
St. Paul, MN 55104

Head of School
Children's House Montessori
341 South Hamline Avenue
St. Paul, MN 55105

Head of School
Children's Center
Montessori I
1536 West Minnehaha
St. Paul, MN 55104

Head of School
Christ Household of Faith
355 Marshall Avenue
St. Paul, MN 55102

Head of School
Cretin School
495 South Hamline Avenue
St. Paul, MN 55116

Head of School
Dayton Avenue Montessori
217 Mackubin Street
St. Paul, MN 55102

Head of School
Derham Hall
540 Warwick
St. Paul, MN 55116

Head of School
East St. Paul Lutheran
School Ass'n.
674 Johnson Parkway
St. Paul, MN 55106

Head of School
Environment for Learning, Inc.
921 Bayless Avenue
St. Paul, MN 55114

Head of School
Faith Baptist Christian
1360 Mississippi Street
St. Paul, MN 55101

Head of School
Guadalupe Area Project
381 East Robie
St. Paul, MN 55107

Head of School
Highland Catholic School
2017 Bohland Avenue
St. Paul, MN 55116

Head of School
Highland Park Montessori
225 South Cleveland Avenue
St. Paul, MN 55104

Head of School
Holy Childhood
1435 Midway Parkway
St. Paul, MN 55108

Head of School
Holy Spirit School
1406 Randolph Avenue
St. Paul, MN 55105

Head of School
Immaculate Heart of Mary
1550 Summit Avenue
St. Paul, MN 55105

Head of School
Jewish Community Center
1375 St. Paul Avenue
St. Paul, MN 55116

Head of School
Macalester Child Center
1652 Summit Avenue
St. Paul, MN 55105

Head of School
Apple School
1885 University Av. S.E.
St. Paul, MN 55104

Head of School
Maternity of Mary
592 West Arlington Avenue
St. Paul, MN 55117

Head of School
McIntyre Center for
Gifted Child
630 Laurel Av
St. Paul, MN 55104

Head of School
Morning Star Montessori
1791 North Albert
St. Paul, MN 55113

Head of School
Montessori Foundation of MN
1003 East Ivy
St. Paul, MN 55106

Head of School
Nativity School
1900 Stanford Avenue
St. Paul, MN 55105

Head of School
Red School House
643 Virginia Street
St. Paul, MN 55103

Head of School
Sacred Heart & St. John
835 East Fifth Street
St. Paul, MN 55106

Head of School
St. Adalbert School
262 Edmund
St. Paul, MN 55103

Head of School
St. Agnes School (Elementary)
525 Thomas Avenue
St. Paul, MN 55103

Head of School
St. Agnes School (Secondary)
525 Thomas Avenue
St. Paul, MN 55103

Head of School
St. Andrew School
1028 Van Slyke Avenue
St. Paul, MN 55103

Head of School
St. Bernard School (Elem.)
1167 Albemarle Street
St. Paul, MN 55117

Head of School
St. Bernard School (Sec.)
170 West Rose Avenue
St. Paul, MN 55117

Head of School
St. Casimir School
930 East Geranium Avenue
St. Paul, MN 55106

Head of School
St. Columba School
1330 Blair Avenue
St. Paul, MN 55104

Head of School
St. Frances de Sales School
426 Osceola Avenue South
St. Paul, MN 55102

Head of School
St. Gregory the Great School
1668 Montreal Avenue
St. Paul, MN 55116

Head of School
St. James School
486 View Street
St. Paul, MN 55102

Head of School
St. John's Lutheran School
771 Margaret Street
St. Paul, MN 55106

Head of School
St. Luke School
1065 Summit Avenue
St. Paul, MN 55105

Head of School
St. Mark School
1983 Dayton Avenue
St. Paul, MN 55104

Head of School
St. Matthew School
10 West Winifred Street
St. Paul, MN 55107

Head of School
St. Pascal Baylon School
1770 East Third Street
St. Paul, MN 55106

Head of School
St. Patrick School
471 East Magnolia Avenue
St. Paul, MN 55101

Head of School
St. Paul Academy-Summit
1712 Randolph Avenue
St. Paul, MN 55105

Head of School
St. Paul Academy-Summit
(Lower)
1150 Goodrich Avenue
St. Paul, MN 55105

Head of School
Temple Baptist School
200 West Seventh
St. Paul, MN 55102

Head of School
Urban Catholic Community
School-St. Peter Claver
1060 West Central Avenue
St. Paul, MN 55104

Head of School
St. Mary of the Lake
112 Bald Eagle Avenue
White Bear Lake, MN 55110

Head of School
St. Pius X School
3878 Highland Avenue
White Bear Lake, MN 55110

Head of School
White Bear Montessori
501 Bloom Avenue
White Bear Lake, MN 55110

Head of School
St. Joseph School
Box 215
Red Lake Falls, MN 56750

Head of School
St. Michael School
Morgan, MN 56266

Head of School
Zion Lutheran School
Box 116
Sanborn, MN 56083

Head of School
Our Lady of Victory School
Lucan, MN 56255

Head of School
St. Anne School
Wabasso, MN 56293

Head of School
St. Mary School
140 South Tenth Street
Bird Island, MN 55310

Head of School
Emanuel Lutheran School
Route 2
Fairfax, MN 55332

Head of School
St. Andrew School
Fairfax, MN 55332

Head of School
St. John's Lutheran School
Box 531
Fairfax, MN 55332

Head of School
St. Aloysious
1005 West Fairview
Olivia, MN 56277

Head of School
Bethlehem Academy
105 Third Avenue Southwest
Faribault 55021

Head of School
Bishop Whipple Schools
Box 218
Faribault, MN 55021

Head of School
Consolidated Catholic Schools
of Faribault
15 Southwest Third Avenue
Faribault, MN 55021

Head of School
Montessori House of
Children, Inc.
309 Erblang Ave
Faribault, MN 55021

Head of School
Peace Lutheran School
3rd Avenue SW & 3rd Street
Faribault, MN 55021

Head of School
Seventh Day Adventist
301 NW 5th St.
Faribault, MN 55021

Head of School
Trinity Lutheran School
526 NW Fourth Street
Faribault, MN 55021

Head of School
W. Roby Allen School
525 East Fifth Street
Faribault, MN 55021

Head of School
Wilson Center School
Box 917
Faribault, MN 55021

Head of School
Trinity Lutheran School
Route 1
Morristown, MN 55052

Head of School
Laura Baker School
211 Oak
Northfield, MN 55057

Head of School
St. Dominic School
216 North Spring Street
Northfield, MN 55057

Head of School
Hills Christian School
Box 27
Hills, MN 56138

Head of School
Duluth Cathedral School
1215 Rice Lake Road
Duluth, MN 55811

Head of School
Holy Rosary School
2802 East Fourth Street
Duluth, MN 55812

Head of School
Lakeview Montessori
1600 North Eighth Avenue East
Duluth, MN 55805

Head of School
Lakeview Christian Academy
1600 N. 8th Ave. E.
Duluth, MN 55805

Head of School
St. Anthony School
1028 East Eighth Street
Duluth, MN 55805

Head of School
St. James School
715 North 57th Avenue West
Duluth, MN 55807

Head of School
St. Jean School
2421 West Second Street
Duluth, MN 55806

Head of School
St. John School
Woodland Ave. & Chisholm St.
Duluth, MN 55803

Head of School
St. Michael School
4828 Pitt Street
Duluth, MN 55804

Head of School
McKinley Christian Academy
Box A
McKinley, MN 55761

Head of School
Assumption School
2310 Seventh Avenue East
Hibbing, MN 55746

Head of School
St. Leo School
39th St. & 2nd Ave. East
Hibbing, MN 55746

Head of School
St. Rose School
2 South Sixth Avenue West
Proctor, MN 55810

Head of School
Marquette
311 3 St. S.
Virginia, 55792

Head of School
Grand Marais Bible School
Route 1, Box 79
Meadowlands, MN 55765

Head of School
Bible Baptist
2801 W 1st St.
Duluth, MN 55806

Head of School
Our Lady of the Prairie
215 North Chestnut
Belle Plaine, MN 56011

Head of School
Trinity Lutheran School
501 West Church Street
Belle Plaine, MN 56011

Head of School
St. John the Baptist School
215 Second Street
Jordan, MN 55352

Head of School
St. Wencelaus School
227 East Main Street
New Prague, MN 56071

Head of School
St. Michael School
16280 Duluth Avenue SE
Prior Lake, MN 55372

Head of School
Prior Lake Christian School
7690 Credit River Road
Prior Lake, MN 55372

Head of School
Shakopee Area Catholic
305 South Scott
Shakopee, MN 55379

Head of School
St. Andrew School
428 Irving Avenue
Elk River, MN 55330

Head of School
Christian Alliance Academy
829 School St.
Elk River, MN 55330

Head of School
St. John's Lutheran School
9243 Viking Blvd Northwest
Elk River, MN 55330

Head of School
St. Martin School
21201 Church Ave.
Rogers, MN

Head of School
St. John's Lutheran School
Route 2
Arlington, MN 55307

Head of School
St. Paul's Lutheran School
510 West Adams
Arlington, MN 55307

Head of School
Immanuel Lutheran School
417 High Ave.
Gaylord, MN 55334

Head of School
Immanuel Lutheran School
Box 177
Gibbon, MN 55335

Head of School
St. Peter's Lutheran School
Route 1
Gibbon, MN 55335

Head of School
Holy Family School
Albany, MN 56307

Head of School
St. Pius V School
Albany, MN 56307

Head of School
Holy Cross School
Route 1
Kimball, MN 55353

Head of School
St. Boniface School
527 Main Street
Cold Spring, MN 56320

Head of School
SS Peter & Paul School
Box 188
Richmond, MN 56368

Head of School
Our Lady of Grace School
Route 2
Freeport, MN 56307

Head of School
Sacred Heart School
Box 38
Freeport, MN 56331

Head of School
St. John School
Route 1, Box 222
Melrose, MN 56352

Head of School
St. Mary School
320 Fifth Avenue Southeast
Melrose, MN 56352

Head of School
Holy Spirit School
1615 11th Avenue South
St. Cloud, MN 56301

Head of School
John XXIII - Cathedral
7th Avenue & 3rd
St. Cloud, MN 56301

Head of School
Montessori School
302 Fifth Avenue South
St. Cloud, MN 56301

Head of School
St. Anthony School
24th Avenue & First Street N.
St. Cloud, MN 56301

Head of School
St. Augustine School
428 Second Street Southeast
St. Cloud, MN 56301

Head of School
St. John's Preparatory
Collegeville, MN 56321

Head of School
St. Joseph School
108 Sixth Avenue North
Waite Park, MN 56387

Head of School
St. Joseph Laboratory
Box 188
St. Joseph, MN 56374

Head of School
St. Mary Help of Christians
Route 3, Box 41
St. Cloud, MN 56301

Head of School
St. Mary's Cathedral
823 First Street South
St. Cloud, MN 56301

Head of School
SS Peter & Paul School
11th Ave & 12th St. N.
St. Cloud, MN 56301

Head of School
St. Wendelin School
Route 8, Box 68
St. Cloud, MN 56301

Head of School
St. Francis Xavier
Sartell, MN 56377

Head of School
Holy Family School
231 Sinclair Lewis Avenue
Sauk Centre, MN 56378

Head of School
Prairie Mennonite School
Route 1
Blooming Prairie, MN 55917

Head of School
Marian - St. Mary's School
Marian Drive
Owatonna, MN 55060

Head of School
Owatonna Christian School
265 26th Street Northeast
Owatonna, MN 55060

Head of School
St. Isidore School
Route 2, Box 90
Owatonna, MN 55060

Head of School
St. Mary School
411 Colorado
Morris, MN 56267

Head of School
St. Francis Xavier School
501 12th Street North
Benson, MN 56215

Head of School
Pioneer Private School
Route 1
Bertha, MN 56437

Head of School
Stony Ridge School
Route 1
Hewitt, MN 56453

Head of School
Browerville Parochial School
Box 186
Browerville, MN 56438

Head of School
Meadow View School
RR 2
Long Prairie, MN 56347

Head of School
St. Mary of Mt. Carmel
425 Central Avenue
Long Prairie, MN 56347

Head of School
Trinity Lutheran School
610 Second Avenue Southeast
Long Prairie, MN 56347

Head of School
Sacred Heart School
324 North Fourth Street
Staples, MN 56479

Head of School
St. John's Lutheran School
516 West Chestnut
Lake City, MN 55041

Head of School
Immanuel Lutheran School
30 South Wabasha
Plainview, MN 55964

Head of School
St. Felix School
130 East Third Street
Wabasha, MN 55981

Head of School
Christian Liberty School
Menahga, MN 56464

Head of School
Hillside
Route 1
Wadena, MN 56482

Head of School
Seventh Day Adventist
222 Third Street Northeast
Wadena, MN 56482

Head of School
St. Ann School
519 Second Street Southeast
Wadena, MN 56482

Head of School
Trinity Lutheran School
501 N. Main St.
Janesville, MN 56048

Head of School
Sacred Heart School
308 West Elm Avenue
Waseca, MN 56093

Head of School
Grace Alliance Christian
432 11th Ave. Southeast
Forest Lake, MN 55025

Head of School
Forest Lake Montessori
807 Hwy 97
Forest Lake, MN 55025

Head of School
St. Peter School
1250 South Shore Drive
Forest Lake, MN 55025

Head of School
St. Jude of the Lake School
600 Mahtomedi Avenue
Mahtomedi, MN 55115

Head of School
Park Grove Academy
8333 Hemingway Avenue South
Cottage Grove, MN 55016

Head of School
Rose of Sharon School
7241 80th Street South
Cottage Grove, MN 55016

Head of School
St. Andrew School
1001 Holly Avenue
St. Paul Park, MN 55071

Head of School
Woodbury Montessori
6695 Upper Afton Road
Woodbury, MN 55119

Head of School
St. Croix School
621 South Third Street
Stillwater, MN 55082

Head of School
Salem Lutheran School
14940 62nd Street North
Stillwater, MN 55082

Head of School
St. Mary School
223 First Street Northeast
Madelia, MN 56062

Head of School
St. John School
Route 1
St. James, MN 56081

Head of School
Calvary Christian
P.O. Box 222
Stillwater, MN 55082

Head of School
St. Paul's Lutheran
St. James, MN 56081

Head of School
St. Mary School
404 Nebraska Avenue
Breckenridge, MN 56520

Head of School
Immanuel Lutheran School
Route 2
Lewiston, MN 55952

Head of School
St. John School
160 Williams Street
Lewiston, MN 55952

Head of School
Cathedral School
352 Center Street
Winona, MN 55987

Head of School
Cotter School
101 East Wabasha Street
Winona, MN 55987

Head of School
Delahanty Montessori
Box 191
Winona, MN 55987

Head of School
Riverhaven School
856 W. 5th St.
Winona, MN 55987

Head of School
St. John's Lutheran School
Route 1
Dakota, MN 55925

Head of School
St. Martin School
253 Liberty Street
Winona, MN 55987

Head of School
St. Mary School
1315 West Broadway
Winona, MN 55987

Head of School
St. Matthew School
756 West Wabasha
Wincna, MN 55987

Head of School
St. Stanislaus School
602 East Fifth
Winona, MN 55987

Head of School
Winona Christian School
1363 Homer Road
Winona, MN 55987

Head of School
St. Francis School
210 First Avenue Northwest
Buffalo, MN 55313

Head of School
Salem Lutheran School
Box 191
Loretto, MN 55357

Head of School
Mount Olive Lutheran School
435 East Bridge Avenue
Delano, MN 55328

Head of School
St. Peter School
235 2nd St.
Delano, MN 55328

Head of School
SS Peter & Paul School
150 Railway Street
Loretto, MN 55357

Head of School
St. James Lutheran School
Box 248
Howard Lake, MN 55349

Head of School
St. Timothy School
207 East Division Street
Maple Lake, MN 55358

Head of School
Riverside Christian School
Monticello, MN 55362

Head of School
St. Michael School
20 Main
St. Michael, MN 55376

Head of School
St. Leo School
St. Leo, MN 56286

Head of School
St. Peter School
410 Ring North
Canby, MN 56220

Head of School
St. John School
Box 155
Wood Lake, MN 56297

Head of School
West Lutheran High School
6300 Walker Room 227
St. Louis Park, MN 55416

Head of School
Faith Baptist School
Stacy, MN 55079

Head of School
Elmore Christian School
Box 342
Elmore, MN 56027

Head of School
Crosstown Baptist School
6500 Baker Road
Eden Prairie, MN 55344

Head of School
Chadashchay
RR 1
Cambridge, MN 55008

Head of School
Cloverdale Mennonite Church
RR 1, Box 86 A
Nashwauk, MN 55769

Head of School
New Life Christian School
6758 Bailey Road
Woodbury, MN 55119

Head of School
Delano Free Church Academy
Elm Avenue
Delano, MN 55328

Head of School
Calvary Assembly Academy
1685 E Hwy 96
White Bear Lake, MN 55110

State of Minnesota
Department of Education

State Board of Education
Special Services Division

IN THE MATTER OF: The Proposed Adoption of Rules of the State Board of Education Governing the Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR § 1.0533

Certificate

I hereby certify that the attached 37 sheets constitute the accurate and complete list of persons, associations, and other interested groups who, as of 8:00 A.M. this 17 day of February, 1981, have requested pursuant to Minn. Stat. § 15.0412, subd. 4 that their names be placed on file with the Minnesota Department of Education for the purpose of receiving notice of the proposed adoption of rules by the State Board of Education.

STATE BOARD OF EDUCATION

By Linda Albers

State Board of Education
Department of Education
Special Services Division

Proposed Rule Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools (5 MCAR § 1.0533)

Notice of Hearing

A public hearing concerning the proposed rule will be held at Veterans Service Building, Room D, 20 West 12th Street and Columbus Avenue, St. Paul, Minnesota 55155 on April 2, 1981, commencing at 9:00 a.m. The proposed rule may be modified as a result of the hearing process. Therefore, if you are affected in any manner by the proposed rule, you are urged to participate in the rule hearing process.

Following the agency's presentation at the hearing all interested or affected persons will have an opportunity to ask questions and make comments. Statements may be made orally and written material may be submitted. In addition, whether or not an appearance is made at the hearing, written statements or material may be submitted to Peter Erickson, Hearing Examiner, Room 300, 1745 University Avenue, St. Paul, MN 55104, telephone (612) 296-8118 either before the hearing or within five working days after the close of the hearing. The hearing examiner may, at the hearing, order that the record be kept open for a longer period not to exceed 20 calendar days. The rule hearing procedure is governed by Minn. Stat. §§ 15.0411-15.0417 and 15.052, and by 9 MCAR §§ 2.101-2.113 (Minnesota Code of Agency Rules). If you have any questions about the procedure, call or write the hearing examiner.

Notice is hereby given that 25 days prior to the hearing, a Statement of Need and Reasonableness will be available for review at the agency and at the Office of Administrative Hearings. This Statement of Need and Reasonableness will include a summary of all the evidence and argument which the agency anticipates presenting at the hearing justifying both the need for and the reasonableness of the proposed rule or rules. Copies of the Statement of Need and Reasonableness may be obtained from the Office of Administrative Hearings at a minimal charge.

The board's statutory authority to promulgate the proposed rules is provided by Minn. Stat. § 125.05, as amended by Laws of 1980, ch. 345, § 2.

The board estimates that there will be no cost to local bodies in the state to implement the rule for the two years immediately following its adoption within the meaning of Minn. Stat. § 15.0412, subd. 7 (1978).

A copy of the proposed rules is attached hereto. One free copy may be obtained by writing to George B. Droubie, Capitol Square Building, 550 Cedar Street, St. Paul, MN 55101. Additional copies will be available at the door on the date of the hearing. If you have any questions on the content of the proposed rule, contact George B. Droubie.

Notice: Any person may request notification of the date on which the Hearing Examiner's Report will be available, after which date the Board may not take any final action on the rules for a period of five 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. If you desire to be so 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 Hearing Examiner's Report, or to the board, in the case of the board's submission or resubmission to the Attorney General.

Minn. Stat. ch. 10A requires each lobbyist to register with the State Ethical Practices Board within five days after he or she commences lobbying. A lobbyist is defined in Minn. Stat. § 10A.01, subd. 11 (1979 Supp.) 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 one month or more than $250, not including his own 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 his own traveling expenses and membership dues, in any year, for the purpose

KEY: PROPOSED RULES SECTION — Underlining indicates additions to existing rule language. ~~Strike outs~~ indicate deletions from existing rule language. If a proposed rule is totally new, it is designated "all new material." ADOPTED RULES SECTION — Underlining indicates additions to proposed rule language. ~~Strike outs~~ indicate deletions from proposed rule language.

of attempting to influence legislative or administrative action by communicating or urging others to communicate with public officials.

The statute provides certain exceptions. Questions should be directed to the Ethical Practices Board, 41 State Office Building, St. Paul, MN 55155, telephone (612) 296-5615.

January 12, 1981

Howard B. Casmey, Secretary
State Board of Education

Rule as Proposed (all new material)

Chapter Twenty-Seven A: Licensure of Supervisory and Support Personnel; Issuance, Suspension, and Revocation

5 MCAR § 1.0533 Head varsity coaches of interscholastic sports in senior high schools.

A. Applicability. Every senior high school shall have a licensed head varsity coach for each interscholastic sport except as otherwise provided in C., below. Each person who is employed and functions as a head varsity coach of an interscholastic sport in a senior high school shall hold a valid Minnesota teaching license and shall satisfactorily complete a preparation program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches of interscholastic sports.

B. Definitions. For purposes of this rule, the following definitions shall apply:

1. Head varsity coach. The teacher who has the primary responsibility for a senior high school varsity interscholastic sport.

2. Interscholastic sports. A sport in which there is scheduled competition with athletic teams of another school within and outside the school district.

3. Senior high school. A secondary school consisting of grades 10-12 or grades 9-12 in a four-year secondary school and grades 9-12 in six-year secondary schools.

C. Scope. Nothing in this rule shall prohibit a school district from employing an unlicensed person as assistant to a licensed head varsity coach of an interscholastic sport or to coach a junior high school sport.

D. Qualifications for licensure. All candidates recommended for licensure as a head varsity coach of interscholastic sports shall have satisfactorily completed a program approved by the Minnesota Board of Education consisting of a maximum of 12 quarter or 9 semester hours containing components designed to provide candidates recommended for licensure with knowledge, skills, and understandings in all of the following areas:

1. First aid and prevention and care of athletic injuries.
2. Science of sports, including principles of anatomy and kinesiology and principles of exercise physiology.
3. Theory and practice of sports techniques.
4. Psychology of sports and coaching.
5. Satisfactory completion of a supervised field experience in coaching consisting of no fewer than 40 clock hours.

E. Alternative route to licensure. A school district may contract with Minnesota colleges and universities which offer approved programs leading to the licensure of head varsity coaches to develop jointly the program of instruction outlined above. Such jointly developed programs must be approved by the Minnesota Board of Education. Recommendation of candidates for head varsity coaching licensure shall be the responsibility of the college or university through which the program was developed.

F. Teachers employed as head varsity, assistant, or junior high school coaches prior to July 1, 1982. A person holding a valid Minnesota teaching license who, prior to the effective date of this rule, is currently employed or was previously employed as a head varsity, assistant, or junior high school coach, as verified by the superintendent of schools of the school district employing the coach, and who can provide verification of completion of six quarter hours or 60 clock hours of instruction in first aid and the prevention and care of athletic injuries shall, upon application, be issued a license as head varsity coach of interscholastic sports.

G. Effective date. The provisions of this rule are effective on July 1, 1982, for applicants for the initial license as a head varsity coach of interscholastic sports.

H. School district hardship situations. In cases where a local school district is unable to employ a licensed head varsity coach of interscholastic sports, the superintendent of such school district may request the commissioner of education to grant a provisional license for one school year and renewable for a maximum of one additional school year to a teacher to serve as a head varsity coach of an interscholastic sport upon evidence submitted by the superintendent of schools that the following conditions have been met:

1. Evidence that the school district is unable to employ a licensed head varsity coach of interscholastic sports for the current school year, and

2. The person to be employed under such authorization holds a current, valid Minnesota teaching license, and

3. The person to be employed under such authorization is currently enrolled in a program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches of interscholastic sports.

I. Licenses as head varsity coaches shall be renewed according to provisions of 5 MCAR § 3.005 continuing education/relicensure.

State Board of Education
Department of Education
Special Services Division

Proposed Rules Governing Prohibition of Discriminatory Practices in Athletic Programs in Public and Private Elementary and Secondary Schools (5 MCAR §§ 1.0667-1.0672)

Notice of Hearing

A public hearing concerning the proposed rules will be held at the Veterans Service Building, Room D, 20 West 12th Street and Columbus Avenue, St. Paul, Minnesota 55155 on March 27, 1981, commencing at 9:00 a.m. The proposed rules may be modified as a result of the hearing process. Therefore, if you are affected in any manner by the proposed rules, you are urged to participate in the rule hearing process.

Following the agency's presentation at the hearing all interested or affected persons will have an opportunity to ask questions and make comments. Statements may be made orally and written material may be submitted. In addition, whether or not an appearance is made at the hearing, written statements or material may be submitted to George Beck, Hearing Examiner, Room 300, 1745 University Avenue, St. Paul, Minnesota 55104, telephone (612) 296-8108 either before the hearing or within five working days after the close of the hearing. The hearing examiner may, at the hearing, order that the record be kept open for a longer period not to exceed 20 calendar days. The rule hearing procedure is governed by Minn. Stat. §§ 15.0411-15.0417 and 15.052, and by 9 MCAR §§ 2.101-2.113 (Minnesota Code of Agency Rules). If you have any questions about the procedure, call or write the hearing examiner.

Notice is hereby given that 25 days prior to the hearing, a Statement of Need and Reasonableness will be available for review at the agency and at the Office of Administrative Hearings. This Statement of Need and Reasonableness will include the evidence and argument which the agency anticipates presenting at the hearing justifying both the need for and the reasonableness of the proposed rule or rules. The agency intends to present only a short summary of the Statement of Need and Reasonableness at the hearing but will answer questions raised by interested persons. You are therefore urged to review the Statement of Need and Reasonableness before the hearing. Additional copies will be available at the hearing. Copies of the Statement of Need and Reasonableness may be obtained from the Office of Administrative Hearings at a minimal charge.

The board's statutory authority to promulgate the proposed rules is provided by Minn. Stat. § 126.21, subd. 5 as amended by Laws of 1980, ch. 355, § 1.

The board estimates that there will be no cost to local bodies in the state to implement the rule for the two years immediately following its adoption within the meaning of Minn. Stat. § 15.0412, subd. 7 (1978).

A copy of the proposed rules is attached hereto. One free copy may be obtained by writing to the State Department of Education, Capitol Square Building, 550 Cedar Street, St. Paul, Minnesota 55101. Additional copies will be available at the door on the date of the hearing. If you have any questions on the content of the proposed rule, contact Dr. Greg Waddick or Archie Holmes, 296-5061 or 296-5020.

Notice: Any person may request notification of the date on which the Hearing Examiner's Report will be available, after which date the board may not take any final action on the rules for a period of five working days. Any person may request

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notification of the date on which the hearing record has been submitted or resubmitted to the Attorney General by the board. If you desire to be so 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 Hearing Examiner's Report, or to the board, in the case of the board's submission or resubmission to the Attorney General.

Minn. Stat. ch. 10A requires each lobbyist to register with the State Ethical Practices Board within five days after he or she commences lobbying. A lobbyist is defined in Minn. Stat. § 10A.01, subd. 11 (1979 Supp.) 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 one month or more than $250, not including his own 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 his own 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.

The statute provides certain exceptions. Questions should be directed to the Ethical Practices Board, 41 State Office Building, St. Paul, Minnesota 55155, telephone (612) 296-5615.

January 12, 1981

Howard B. Casmey, Secretary
State Board of Education

Rules as Proposed (all new material)

Chapter Thirty-Three: Prohibition of Discriminatory Practices in Education

5 MCAR § 1.0667 Athletic programs. Authority, scope and purpose. These rules are promulgated pursuant to Minn. Stat. § 126.21, subd. 5, as amended by Laws of 1980, ch. 355, § 1. These rules apply to both public and private elementary and secondary schools that operate athletic programs.

5 MCAR § 1.0668 Definitions. All the words below shall have the meaning herein ascribed to them:

A. "Athletic program"—Means all interscholastic and intramural sports offered to students by public and private elementary and secondary educational institutions.

B. "Interscholastic athletic program"—Means all athletic activities offered within a school the purpose of which is to provide opportunities for students to compete with other students on like teams in other schools within an organized conference under the auspices of the Minnesota State High School League or with other like teams in other schools operating under separate jurisdictions.

C. "Intramural athletic program"—Means all non-interscholastic athletic activities offered within a school, which are not a part of the regular physical education curriculum, designed to provide students athletic opportunities, experiences and the development of competencies in a variety of sports.

D. "Participate"—Means for interscholastic sports, a student has been selected by the coach to be a member of a particular athletic team, inclusive of both varsity and junior varsity teams, after the try-out period has ended.

E. "Participation rate for a particular sex in the interscholastic athletic program"—Means the ratio of the number of participants of that sex in the athletic program to the number of students of that sex in the student body.

F. "Participation rate for a particular sex in the intramural athletic program"—Means the ratio of the number of participants of that sex in the athletic program to the number of students of that sex in the student body.

5 MCAR § 1.0669 Separation by teams.

A. Athletic programs for students in the seventh grade or above may include one or more teams limited to participants of one sex whose overall athletic opportunities have previously been limited. Athletic programs for students in the sixth grade or below may contain one or more teams which are limited to participants of one sex whose overall athletic opportunities have previously been limited and who by demonstrated interest indicate a desire to participate on a team restricted to members of that sex.

B. Any public or private elementary or secondary school may provide in the same sport two teams which are separated according to sex when overall athletic opportunities for one sex have previously been limited, but the team for the other sex may only be substantially separated by sex.

C. When overall athletic opportunities for one sex have previously been limited, members of that sex shall be permitted to try out and, if successful, to participate on any team in any sport. This rule does not prohibit any elementary or secondary school from making participation on a team in a sport dependent upon a demonstrated level of skill and ability.

EDU-81-002-PE

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE DEPARTMENT OF EDUCATION

In the Matter of Proposed Adoption of a Rule of the State Board of Education Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR § 1.0533.

REPORT OF THE HEARING EXAMINER

The above-entitled matter came on for hearing before Hearing Examiner Peter C. Erickson of the State Office of Administrative Hearings at 9:00 a.m. on Thursday, April 2, 1981, in Conference Room D, Fifth Floor, Veterans Service Building, St. Paul, Minnesota.

Sheila Fishman, Special Assistant Attorney General, appeared as counsel on behalf of the Board of Education. Dr. Gregory J. Waddick, Assistant Commissioner of the Department of Education, and Dr. George B. Droubie, Manager of Personnel Licensing Emplacement, appeared and testified in support of the proposed rules on behalf of the Board of Education. The hearing continued until all interested groups or persons had had an opportunity to testify concerning the adoption of the proposed rule.

The Board of Education must wait at least five working days before taking any final action on the rules; during that period, this Report must be made available to all interested persons upon request.

Pursuant to the provisions of Minn. Stat. § 15.0412, subd. 4d (1980), this Report has been submitted to the Chief Hearing Examiner for his approval. If the Chief Hearing Examiner approves the findings of this Report, he will advise the Board of actions which will correct the defects and the Board may not adopt the rule until the Chief Hearing Examiner determines that the defects have been corrected. However, in those instances where the Chief Hearing Examiner identifies defects which relate to the issues of need or reasonableness, the Board may either adopt the Hearing Examiner's recommendations to cure the defects or, in the alternative, if the Board does not elect to adopt the recommendations, it may submit the proposed rule to the Legislative Commission to Review Administrative Rules for the Commission's advice and comment. Provisions relating to this submission to the Commission may be found in Minn. Stat. § 15.0412, subd. 4d (1980).

If the Board elects to adopt the recommendations of the Hearing Examiner and makes no other changes and the Chief Hearing Examiner determines that the defects have been corrected, then the Board shall submit the rule to the Attorney General for review of form and legality. If the Board makes changes in the rule other than those recommended by the Hearing Examiner, then it shall submit the rule, with the complete record, to the Chief Hearing Examiner for a review of the changes before adopting it and submitting it to the Attorney General. Procedures relating to this subsequent review by the Chief Hearing Examiner are set forth in Minn. Stat. § 15.0412, subd. 4e (1980).

When the Board submits the rule to the Attorney General, it shall give notice on the day of submission to all persons who requested that they be informed of the submission to the Attorney General.

Based upon all the testimony, exhibits and written comments, the Hearing Examiner makes the following:

FINDINGS OF FACT

Procedural Requirements

1. On January 14, 1981, the Board filed the following documents with the Chief Hearing Examiner:

(a) A copy of the proposed rules.
(b) The Order for Hearing.
(c) The Notice of Hearing proposed to be issued.
(d) A Statement of the number of persons expected to attend the hearing and estimated length of the Agency's presentation.

2. On February 23, 1981, a Notice of Hearing and a copy of the proposed rules were published at 5 State Register 1293.

3. On February 17, 1981, the Board mailed the Notice of Hearing to all persons and associations who had registered their names with the Board of Education for the purpose of receiving such notice.

4. On March 5, 1981, the Board filed the following documents:

(a) The Notice of Hearing as mailed.
(b) The Agency's certification that its mailing list was accurate and complete.
(c) The Affidavit of Mailing the Notice to all persons on the Agency's list.
(d) The Statement of Need and Reasonableness.
(e) The names of Board personnel who will represent the Agency at the hearing together with the names of any other witnesses solicited by the Agency to appear on its behalf.
(f) A copy of the State Register containing the proposed rules.
(g) An Affidavit of Additional Notice.
(h) All materials received following a Notice of Intent to Solicit Outside Opinion published at 5 State Register 212, August 11, 1980 .
(i) The Petition requesting a rule hearing.

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

5. The record remained open through April 13, 1981 for the receipt of written comments and statements.

6. Statutory authority to promulgate the proposed rule is contained in Minn. Stat. § 125.05, subd. 1 (1980). Pursuant to that section, the State Board of Education is given authority to license educational supervisory and support personnel, which includes athletic coaches.

7. The background for this proposed rule is set forth in the Statement of Need and Reasonableness as follows:

> The proposed rule 5 MCAR § 1.0533 is necessary to implement licensure standards and procedures for head varsity coaches of interscholastic sports in senior high schools. At present, only head coaches in six boys' sports are required to hold licensure. Those sports are football, baseball, basketball, track, wrestling, and hockey. A rule which was to become effective in 1972 governing licensure of coaches of interscholastic sports for girls was repealed after the Commissioner of Human Rights determined that discrimination in the applicability of two separate coaching licensure rules, with differing criteria, one for boys' interscholastic sports and one for girls' interscholastic sports, would have existed. Subsequently, numerous meetings and public

hearings were conducted in an attempt to enact an equitable coaching licensure rule which would not necessitate the elimination of athletic opportunities for students in secondary schools.

Proposed licensure rule 5 MCAR § 1.0533 was developed after input and meeting with the following organizations and agencies: Minnesota Board of Teaching; Minnesota School Boards Association; Minnesota Education Association; Minnesota Federation of Teachers; Minnesota State High School League; Association of Metropolitan School Districts; Minnesota State High School Coaching Association for Boys and Girls; Minnesota State High School Athletic Directors' Association; Minnesota colleges and universities involved in teacher preparation; Minnesota Congress of Parents, Teachers and Students; and the Minnesota Association of School Administrators. These organizations responded to invitations and took part in meetings and provided input. Many other organizations were invited but did not respond. In addition, every school district in the state received a proposed draft of the rule and many of the districts did respond in writing to the proposed draft. The State Board of Education believes that the proposed licensure rule 5 MCAR § 1.0533 has had extensive input and development through the process described above, and that the proposed rule is both needed and reasonable.

5 MCAR § 1.0533 is needed to assure that those persons serving as coaches of interscholastic sports meet minimally acceptable standards. The proposed licensure rule is premised upon the assumption that coaching is teaching; therefore, this proposed rule requires head varsity coaches of interscholastic sports in senior high schools to hold a valid Minnesota elementary or secondary teaching license.

8. Proposed 5 MCAR § 1.0533 is divided into nine Subparts, A - H. Each Subpart will be discussed separately in terms of evidence offered supporting or opposing the individual provision. However, because of the interrelationship of the Subparts, the Hearing Examiner's Findings regarding the need for and reasonableness of the proposed rule are contained in the last Finding of Fact, No. 18, where alternatives are suggested based upon all of the evidence set forth herein.

9. Subpart A. of proposed 5 MCAR § 1.0533 requires that every senior high school have a licensed head varsity coach for each interscholastic sport who holds a valid Minnesota teaching license and has satisfactorily completed a preparation program approved by the Minnesota Board of Education. The Board believes that programs of interscholastic sports are an integral part of the total school program and should be so designed as to be of educational value. Therefore, the Board stated that it is essential that coaches in interscholastic sports meet the licensure requirements stated in the rule and hold a Minnesota teaching license. The Board submitted an article from the February 8, 1981, St. Paul Sunday Pioneer Press in support of the teaching license requirement. The article states that there was a significant injury rate of 40 injuries per 100 players in Minnesota high school athletics, but that only 25% of the coaches were prepared in current first-aid information. The article further stated that:

> It is the head coach who is the key to reducing injuries. . . . The better prepared he is in health care, the safer his athletes will be. That means current first-aid information, course work in injury care and prevention, coaching clinics and training in such things as cardio-pulmonary resusitation.

A. Comments supporting Subpart A. were received from the Columbia Heights Public Schools and from the Minnesota Association of School Administrators, both of whom stated that:

Ideally, all head varsity coaches would be licensed teachers since an athletic program is seen as an important part of the total educational opportunities which are available to pupils enrolled at the senior high school level.

Charles D. Prokop, Head Varsity Coach of the Girls' Gymnastic Team at White Bear Senior High School, commented in favor of Subpart A. as follows:

I now believe that in order to attract qualified people into coaching, and encourage them to stay on for enough time to develop extra-curricular programs into something truly worthwhile, requires that serious re-thinking about coaching be done.

Increasing the license requirements is a step in the right direction. It is true that the trend is for coaches to leave coaching because coaching is becoming a more difficult task; but if coaching can become more professionalized by having the responsibilities recognized more clearly, then I'm in favor of that. I believe that this proposal will make this possible.

Testifying in favor of Subpart A. were Dan Moriarty of the Minnesota Education Association, who supported the Board's statement that coaching is teaching and therefore, coaches should be licensed teachers, and Allen Olson of the Minnesota Federation of Teachers, who stated that the high risk of injury in varsity sports dictates that coaches should be trained in the care and prevention of athletic injuries and should be required to hold both teaching and coaching licenses. Additional testimony in favor of Subpart A. was given by Dorothy McIntyre, representing the State High School League, who commented that, at the present time, certification is required only for six boys' sports and for none of the girls' sports.

B. Opposition to Subpart A. was expressed by a number of representatives of schools and school districts, primarily those located in rural areas. Many of the comments emphasized the present shortage of qualified coaches, and expressed the concern that athletic programs would have to be eliminated if licensed coaches were unavailable. Typical of the comments submitted in opposition to Subpart A. was that of James W. Schwartz, Superintendent of the Carlton Public Schools, who commented as follows:

1. Small school districts will not be able to staff minor sports with certified staff, which will necessitate the dropping of sports activities.

2. The cost of upgrading staff to a certified position would increase an already over-extended budget.

3. Requiring a head coach to also be a certified teacher eliminates a possible source for coaches that, with proper selection procedures, could provide qualified people who will ensure safety, prevention of injury and the proper instruction of students.

The Carlton school board believes in the principles behind the rule change, however, it feels the end result will be the cancellation of sports activities, and therefore, students will suffer. Vern E. Pfeifer, Superintendent of the Oslo Public Schools, stated that due to declining enrollment, younger teachers with less seniority, who normally do the coaching, are being cut from the teaching staff. Furthermore, small communities would be unable to attract new personnel who would qualify under the proposed rule. As a result, certain sports would be dropped. Similar objections were received from the Remer-Longville Schools, the North St. Paul-Maplewood and Oakdale Public Schools, the Hinckley Public Schools, Emmons Public School, the Cyrus Public Schools, the Elmore Schools, the Albany area public schools, and the Tracy Public Schools.

The Board of Directors of the Minnesota School Boards Association commented in opposition to proposed Subpart A. as follows:

> It is because many school districts have contacted our office expressing their concern about the ramifications of the combination of practical problems cited above with the requirement that a licensed head varsity coach of interscholastic sports be a currently licensed teacher that the Board of Directors of the Minnesota School Boards Association cannot support the proposed rule.
>
> Enough evidence has been submitted to the Hearing Examiner on previous occasions to substantiate the practical problems faced by school districts in attempting to comply with the proposed rule. MSBA believes that the proposed rule would be greatly improved and acceptable by the removal of the requirement that a head coach of a varsity interscholastic sport be a validly licensed teacher.
>
> It should be remembered that coaching would be a minor function on a teaching license and that for the most part coaching assignments are not part of the teacher's individual continuing contract, but are established as an extra-curricular function which generally is agreeable to both the employer and the employee. The requirements in the proposal to possess a valid teaching license and, therefore, subject to continuing education place life licensed personnel under a system whereby 120 renewal units will be required for a minor function which is usually voluntary in nature. The inherent inequity in time and cost is significant.
>
> The liability factor is often raised as a major reason for the need for the proposed rule. MSBA believes that licensure will not prevent liability suits in athletics. The significant aspect relative to athletic injury is training for personnel in care and prevention and first aid. Licensure is not significant except as a deterrent to athletic opportunity for students. School districts will be involved in athletic tort cases with or without licensure. It is their responsibility to staff with "qualified" individuals. In the final analysis school districts stand alone in each tort situation on the merits of the facts in each individual case and not on the basis of licensure.

Donald W. McMoore, Director of Athletics for the Minneapolis Public Schools, testified that older teachers have given up their coaching duties, while the younger teachers who usually coach have been cut from the staff due to declining enrollment. Jim Mitchell, Superintendent of Schools in Fairmont, testified that the teacher certification requirement would result in the discontinuation of two major sports in Fairmont due to the lack of available certified coaches. A similar statement was made by Roger Worner, Assistant Superintendent of the White Bear Lake Schools. Mr. Worner also testified as follows:

> It is our assumption that indeed the proposed rules will have a dramatic impact on our school district's athletic programs, our extracurricular programs. We expect the programs will be cancelled. We expect we will be unable to secure coaches who meet the provisions of the proposed rule. We expect that--it was quoted earlier a vast majority of the staffing problems will be eliminated by just requiring head coaches to be licensed.
>
> Another point that was made that we will not see a sudden decline in extracurricular programs. I think state-wide we will. I do not believe that based on our track record, good salary schedule, with many fine opportunities for excellent programs we have been able to attract coaches in the past in the numbers that we needed them, and I cannot imagine that the imposition of this rule in its present form is going to cause more coaches to be interested in coaching and not cause some coaches who have served our school district for many, many years not to consider dropping

out of the coaching ranks. We have not formally surveyed our coaches, but have spoken to many of them and asked if in fact this rule as stated without modification is adopted would they or would they not continue in the coaching ranks and we have received responses from many coaches, more than a dozen, that they would not stay in the coaching ranks if they were forced to go through the certification provisions as applied in certain passages of the rule.

Judy Johnson, on behalf of the Minnesota State High School Coaches' Association for Girls' Sports, Inc., proposed an alternative to Subpart A. Ms. Johnson suggested that persons who possess a bachelor's degree with a coaching minor be allowed to receive coaching licensure. The coaching minor would include all of the courses cited in proposed 5 MCAR § 1.0533 and the supervised coaching practicum. Ms. Johnson stated that, with this proposal, persons who want to coach, but are discouraged from becoming teachers because of the limited job opportunities in teaching, may be licensed. Representatives from Gustavus Adolphus College, St. Cloud State University and Concordia College submitted written comments in support of Ms. Johnson's proposal. Additional support is contained in the testimony of Frank Mach, Director of Physical Education and Athletics at the College of St. Thomas.

10. Subpart B. of proposed 5 MCAR § 1.0533 defines the terms, head varsity coach, interscholastic sports, and senior high school, as they are used throughout the proposed rule.

11. Subpart C. of the proposed rule would permit a school district to employ an unlicensed person as an assistant to a licensed head varsity coach or to coach a junior high school sport.

A. The Board supported the need for and reasonableness of Subpart C. as follows:

> Section C. is a compromise included after previous public hearings indicated that a severe shortage of coaches will result if assistant coaches and junior high school coaches are required to hold licensure. Testimony also showed that programs would be severely curtailed and/or limited if this limitation is not included in the rule. Therefore, the proposed rule applies only to head coaches; it does not require licensure for assistant coaches and junior high coaches.
>
> Ideally, the Board believes that assistant coaches and junior high school coaches should be prepared at least in the areas of first aid and care and prevention of athletic injuries. It is anticipated that school districts will endeavor to provide this minimal training on an inservice basis for assistant coaches and junior high school coaches. The decision not to require licensure for assistant and junior high school coaches is based upon several factors. The Board recognizes that there has been a vast increase in school athletic programs and in participation, particularly for girls. This fact, together with declining enrollments and associated declines in school revenues, has created problems for staffing of the programs. The Board believes that by excluding assistant and junior high school coaches from the licensure requirement, the vast majority of the staffing problems will have been eliminated. It should be recognized, however, that no licensure rule will eliminate all staffing problems and should not be expected to do so.

B. Representatives from Southwest State University, the University of Minnesota, and Moorhead State University expressed the view that coaches of junior high school children should also be licensed because the younger children need as much educational instruction, and are in as much danger of physical injury as are older students. Members of the Health and Physical Education

Department at Southwest State University commented as follows in opposition to Subpart C.:

> We believe that children developing initial skill techniques and attitudes have the greatest need for a competent, compassionate coach. We believe that these children deserve coaches who have knowledge of how to teach the basics of sports. We therefore believe it is desirable to license coaches of junior high school sports. To not do so seems analogous to licensing secondary but not elementary teachers, a practice that would surely be rejected. The proposed rule calls for head coaches to have knowledge of first aid and prevention and care of athletic injuries. The risk of injury to younger competitive, contact sport participants is not sufficiently less than that of their older counterparts to justify lack of licensure for coaches of younger children.
>
> It seems to us that licensure should cover coaches of all contact sports at all levels. If that is not possible, and we recognize the sufficient forces against it, then we would support tighter licensure restrictions on coaches of children at the formative level than those for coaches at the varsity level. Less desirable, because of concern for the safety and welfare of children, is to license no one. However, that alternative seems almost as attractaive as the proposed rule.

12. Proposed Subpart D. provides that candidates for head varsity coach licensure must complete an educational program consisting of a maximum of 12 quarter hours or 9 semester hours of instruction in the following subjects:

(1) first aid and prevention and care of athletic injuries;

(2) science of sports, including principles of anatomy and kinesiology and principles of exercise physiology;

(3) theory and practice of sports techniques;

(4) psychology of sports and coaching;

(5) satisfactory completion of a supervised field experience in coaching consisting of no fewer than 40 clock hours.

A. The Board supported the requirements of Subpart D. as follows:

> Section D. of the proposed rule specifies the qualifications for coaching licensure. It is designed to contain the components determined by previous task forces to provide essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport. It should be noted that the rule establishes a maximum of 12 quarter or 9 semester hours of credit for all coaching programs that are submitted to the Board of Education for approval.
>
> The Board recognizes that this attempt to limit programs to 12 quarter or 9 semester hours of credit may be opposed by a number of Minnesota colleges and universities. A number of colleges and universities will state that they are unable to prepare coaches with such a restricted number of credits. While many of the coaching programs in Minnesota colleges and universities currently range from 30 to 40 quarter hours of credit, it is the position of the Board that programs of such length are unnecessary to provide acceptable coaching ability, are prohibitive in length, and accentuate recruiting problems at the school district level. It is the position of the Board of Education that a preparation program consisting of 12 credits is a reasonable number of credits for licensure, and that colleges will be able to redesign and restructure some of their courses to accomplish a preparation program which provides the essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport within the parameters of this rule.
>
> The 12 credits pertain only to those teachers who desire a coaching endorsement and are not physical education majors or minors.

> Persons who are preparing to be physical education teachers will, as part of their program, have completed a coaching preparation endorsement. This proposed rule does not prohibit a college or university from offering a coaching minor or major or a more extensive program for those who desire more preparation. It simply requires completion of an approved program consisting of a maximum of 12 quarter credits for licensure as a coach of interscholastic sports.

In addition, Dr. Droubie testified that:

> There ought to be a more reasonable number of credits. Maybe it isn't 12, but if it is too many more, we are not going to have coaches and I think the point we should keep in mind is that we are talking about an entry-level license. It isn't . . . intended to turn out someone that knows everything there is to know about children and coaching. . . . We are talking about what is minimally needed to protect children that are taking part in interscholastic sports at the varsity level. . . .

B. Many comments expressing opposition to Subpart D. were submitted by representatives of Minnesota colleges and universities. The objection raised was that coaches could not be prepared adequately in the required subjects in only 12 quarter hours or 9 semester hours. Helen Berwald, president of the Minnesota Association of Colleges for Teacher Education, submitted the following comment in opposition to Subpart D.:

> The introduction of the strategy of establising maximums distorts the essence of the approved program approach in that it reduces institutional autonomy to an unwarranted and undesirable extent, it eliminates diversity among programs, and in fact, requires institutions to move away from the very quality the state is obligated to protect and encourage. If institutions lose their freedom to design programs in accordance with their values and qualitative standards, then schools and parents will also lose their freedom to choose the kind of education they desire to teach their children.

Tom Porter, Chairman of the Physical Education Department of St. Olaf College, opposed the maximum credit provision on the ground that it is "too restrictive to achieve any meaningful treatment of the competencies." Mr. Porter suggested, instead, a range of credit limitations of 9 to 15 semester hours. Representatives of the Physical Education Division of the College of Education of the University of Minnesota objected to Subpart D. as setting "a precedence for licensing mediocre, if not incompetent, coaches." The proposed rule would "produce coaches with a minimal exposure to, and at best a superficial understanding of, the essential content." The omission of a course in the ethics of coaching was also criticized. Similar objections were raised by representatives of Bemidji State University, Concordia College, Gustavus College, Hamline University, Moorhead State University, the College of St. Catherine, St. Cloud State University, Southwest State University, and the Office of the Chancellor of the State University System.

Jack Amann, Chairman of the Mankato State University Physical Education Department, testified in opposition to Subpart D. as follows:

> We could reduce . . . down to perhaps 18 credit hours, but I would feel very inadequate—I would feel ashamed perhaps of backing anybody going into the field with that type of preparation. Let me give you an example. We took one course to try to meet the needs that are evident in school administration and in filling positions, and particularly in the sciences. This is difficult. We instituted a course called Scientific Foundations of Coaching, which incorporated anatomy, kinesiology and exercise

physiology. We are having problems with that. We are not doing the job. We are team teaching. If you are talking about economics, as Mr. McMoore did, we have those problems also. We cannot afford to use three teachers for one course to make that course apply to preparation. So it would be very difficult for us to come down to that maximum of 12. I am sure that we would fade out of the picture and merely establish coaching minor for those who are in need of it, and let the in-service job--in service approach do the job as the schools want to do this. We could not--we will not relinquish our moral and ethical responsibility for preparing any students for any profession.

Sheila Kaplan, Vice Chancellor for Academic Affairs of the State University System, offered the additional criticism that:

"It is within the the responsibility of the Department of Education to propose minimum standards, and within the responsibility of the teacher-preparing institutions to respond with a proposed curricula. The proposed rule, which can be construed to infringe on the institutional autonomy to determine curriculum, sets a precedent that the State University System believes to be inappropriate."

J. N. Malmquist of Gustavus Adolphus College raised the same objection, stating that "the proposed rule would . . . establish a dangerous bureaucratic precedent in controlling academic programs."

Helen Berwald, president of the Minnesota Association of Colleges for Teacher Education, commented in opposition to Subpart D. as follows:

The purpose of this particular memorandum is not to speak to the relative merits of various positions on this specific issue, inasmuch as individual institutions are sending representatives to present testimony of that kind. It is to express to you the serious concern of those deans and faculty representatives who constitute our membership regarding an unusual provision in the rule which establishes a maximum requirement rather than the usual minimum. (I refer, of course, to Section D which establishes a maximum of 12 quarter or 9 semester hours. As that language has been interpreted to us, any program submitted which requires more than the specified number of hours would be denied approval.) If this strategy succeeds in forcing unwilling institutions to offer the abbreviated programs the state desires, and only those kinds of programs, what is to prevent the State from invoking this provision as a precedent which could be applied to all programs?

As suggested earlier, previous rules have dealt with minimums, as practice we believe lies within the spirit and intent of the approved program approach in that it gives the State the opportunity to fulfill its obligation to provide quality education for its citizens, while at the same time respecting institutional autonomy and allowing for a certain amount of diversity among programs.

13. Subpart E. of proposed 5 MCAR § 1.0533 provides an alternate route to licensure. It permits a school district to contract with a college or university which offers an approved coaching licensure program and to develop a joint program which can be offered on an in-service basis in a Minnesota school district.

A. The Board of Education stated that the need for this section of the proposed rule is "to create flexibility for those school districts that desire to prepare their own coaches on an in-service basis in conjunction with a college or university."

B. Representatives of several school districts suggested that alternative programs should be able to be conducted by the schools, themselves, or at the local level. Dr. Bernard Kaye, Director of Personnel for the Austin

Public Schools, commented as follows:

> We would urge that there be flexibility for certain kinds of programs or course work needed, particularly in the area of first aid and prevention and care of athletic injuries. It would seem that this kind of a program could be developed jointly with a local community college which for us here in Austin would be much more convenient and practical as opposed to travelling to one of the universities. We would urge that this kind of flexibility be permitted.

Roger Worner, Assistant Superintendent of the White Bear Lake Schools, favored the idea of the training program but urged that it be done on the local level:

> We are as a school district very excited about the prospect of either having someone else develop for us and provide to us training programs which we will carry out, either individually as a school district, through the ECSU, through the Minnesota State High School League or through a joint district cooperation. We believe that we have competent qualified staff members who are certified by the State Department of Education in physical education and health related areas, first aid, cardiopulmonary resuscitation and many, many other areas who would serve well in providing training. We would also like to be able to select staff members who may be part of a professional team, college team of consultants, to bring them in and determine our own instructional programs or to follow guidelines established by the State Department of Education. We have no problems with the provision of training. We are pleased to provide the training. It is the matter of whether or not we must be forced to cooperate and meet the standards of a college or university in lieu of our preparation and dissemination of our own program. We believe we can provide these programs by ourselves or jointly with others. We believe that the number of credits required for coaches who may be outside of the school district who may not have permanent employment are excessive. We do believe that there are other agencies and other school districts that are amply willing to cooperate with us in carrying out such instructional programs and would be very very pleased if the State Department of Education would decide on the curriculum, disseminate it to the school districts, and give us guidance in the school districts. . . . our staff members say we think we ought to be reimbursed for that, or we don't want to go or we think that it is an unreasonable burden or will you provide the program inside of the school district. We think it is reasonable to offer that program under the guidance of the State Department in our local school district.

Donald McMoore of the Minneapolis Public Schools, and R. L. Thienes, Principal of White Bear Senior High School, both commented that experienced people were available within their districts to provide the necessary in-service programming. Neither felt that association with a college or university was necessary. In addition, Richard St. Germain, Assistant Superintendent of Secondary Education for the North St. Paul, Maplewood and Oakdale Schools, objected to Subpart E. on the basis that it is not clear who would pay for the in-service training programs.

14. Subpart F. of the proposed Rule is a "grandparent" provision that would permit persons employed before the effective date of the proposed rule as a head varsity, assistant, or junior high school coach, who hold valid teaching licenses, and who can demonstrate that they have completed six quarter hours or 60 clock hours in first aid and the care and prevention of athletic injuries, to be issued a head coach license.

A. The Board supported the need for the grandparent provision as follows:

It is the deliberate intention of Section F., to be generous in grandparenting those teachers that have been serving as coaches and assistant coaches in order not to restrict the supply of coaches available for interscholastic coaching positions. The Board, however, does feel that no grandpersoning should occur unless evidence can be provided of the minimal preparation specified in first aid and the care and prevention of athletic injuries. It should be noted that the Department of Education will be flexible in accepting 60 clock hours of instruction on an in-service basis through the Red Cross or other appropriate agencies.

B. Dan Moriarty, on behalf of the Minnesota Education Association, testified in support of the grandparent provision because of the current shortage of coaches and the need to retain those who are currently coaching. In addition, Allen Olson, on behalf of the Minnesota Federation of Teachers, testified in support of Subpart F. Representatives of the School of Physical Education at the University of Minnesota supported the provision with the qualification that the candidate's knowledge should be reasonably current. A representative of the International Falls School District suggested that any coach who could demonstrate that he/she has completed five athletic seasons of coaching prior to July 1, 1982, and is a licensed teacher, should be grandparented.

15. Subpart G. of proposed 5 MCAR § 1.0533 states that the rule will become effective on July 1, 1982, for applicants for the initial license as a head varsity coach of interscholastic sports. The Board stated that this effective date is reasonable because of the generous grandpersoning provisions which will not curtail the present supply of coaches. The Examiner finds that the need for and reasonableness of Subpart G. has been demonstrated by the Board.

16. Subpart H. of the proposed rule is a provision for hardship situations in which a school district is unable to employ a licensed head varsity coach. Under such circumstances, a school district may request that a one-year provisional license be issued to a coach if the coach holds a current Minnesota teaching license and is enrolled in a program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches.

A. The Board supported the need and reasonableness of the hardship provisions as follows:

In previous hearings involving coaching licensure, school districts indicated that unless special provisions were made for emergency licensure they would be made to curtail or eliminate some athletic programs. Section H. of the proposed rule is intended to address hardship situations where a district may request of the Commissioner of Education a provisional license for a teacher to serve as an interscholastic coach while the preparation program is being completed in a Minnesota college or university.

This section requires that the provisional license be granted only to teachers. The Board of Education does not believe that it is necessary or responsible to include the possibility of granting a provisional license to those persons not holding a valid teaching license. The Board believes that the hardship situations that districts may face can be accommodated by the provisions outlined in Section H. of the proposed rule.

B. Several comments were submitted which objected to the hardship provision because of the requirement that only a licensed teacher may be eligible for a provisional coaching license. Roger Doucet, Superintendent of the Holdingford Public Schools, submitted the following comment in opposition to Subpart H.:

While I am in complete agreement with the intent of the proposed rules, there is a very real and practical issue I am compelled to call to your attention.

Albeit that licensed teachers/coaches would, in all probability, provide a generally safer learning situation for student-athletes, in reality, licensed teachers as coaches can be very difficult to secure for some sports. Indeed, District 738 has been challenged and will be challenged again to secure licensed teacher/coaches for swimming and gymnastics, even to the point of hiring less desirable teachers for the sake of the competitive athletic experience and coaching expertise they could bring to the job.

It is our opinion that the mere fact of licensure as a teacher, or even as a coach, but without competitive experience (as a gymnast in particular) in the sport, would not appear to offer as safe a learning experience as would a mature, experienced athlete in that sport.

Therefore, we urge the hearing examiner and the State Board of Education, to consider deleting Section H, Subdivision 2 of the proposed rules. We would prefer that in hardship cases, local school districts be given greater flexibility and discretion in providing the safest and best learning experience possible for our student-athletes, even if it means that the coach is not licensed as a teacher.

Norman B. Maguire, on behalf of the Minnesota Association of School Administrators, stated that provisional licensure should be made available to non-teachers. Mr. Maguire stated that if that was not done, students throughout the state will be losing out on athletic opportunities because of the shortage of coaches. Maguire suggested that the criteria for a school district to request provisional licensure be amended as follows to allow for licensure of non-teachers:

1. Evidence that the school district is unable to employ a licensed head varsity coach of interscholastic sports for the current school year, and

2. The person to be employed under such authorization has experience in the sport and can demonstrate the fundamental knowledges and skills necessary for coaching the sport, and

3. The person can provide some verification of experience in working with high school or college students in some form of organized group activity.

Similar comments in opposition to Subpart H. were submitted by Jim Mitchell, Superintendent of the Fairmont Schools, and Roger Worner, Assistant Superintendent of the White Bear Lake Schools. The North St. Paul, Maplewood and Oakdale Schools, I.S.D. No. 77 (Mankato), Columbia Heights Public Schools, Borup I.S.D. No. 522, and the Albany area schools also recommended that the rule contain a provision which would allow provisional licensure for non-teacher coaches.

17. Subpart I. of the proposed rule states that head varsity coach licenses shall be renewed according to provisions of 5 MCAR § 3.005.

18. The Hearing Examiner finds that the need for and reasonableness of proposed 5 MCAR § 1.0533 has not been demonstrated by the Board of Education. The proposed rule would create a comprehensive system of licensure for all head coaches of varsity interscholastic sports. The critical provisions of

the proposal require that each new licensee, and provisional licensee in hardship situations, hold a teaching license. In order to guard against the unavailability of coaches when the rule becomes effective, provisions for alternate route training programs, grandpersoning present teacher-coaches, and a maximum two-year provisional licensure have been included. In addition, the proposed rule would effectively reduce the educational credit requirement for coaches' programs by half, making it easier for a student in a teaching program to get coaching qualifications.

The record shows that regardless of alternate route training, grandpersoning and provisional licensure, requiring all head varsity coaches to be licensed teachers, whether they are new licensees, grandpersoned or provisionally licensed, will have a very significant adverse impact on high school athletic programs, especially in rural Minnesota. Because of declining student enrollment, the average age of teaching staffs, and the number of sports for both sexes which are now interscholastic and require head coaches, school districts are forced to go to the private sector to recruit coaches if athletic programs are to be continued. Requiring that all coaches be teachers would place an impossible burden on a school district which is not in a position to hire new teachers and whose present teacher-employees do not want the added responsibility of coaching. This adverse impact creates a rule which is both unreasonable and arbitrary. See, Juster Bros. v. Christgau, 214 Minn. 108, 7 N.W.2d 501 (1943); Lee v. Delmont, 228 Minn. 101, 36 N.W. 2d 530 (1949); In re Application of Byron M. Hansen, 275 N.W.2d 790 (Minn. 1978). Additionally, there is nothing in the record to suggest that a teacher-coach could administer a more safe, injury-free athletic program than a properly trained non-teacher. The record also shows that it would be very difficult for coach preparing institutions to condense a coaching program to 12 quarters or 9 semester hours and still offer a program which would adequately prepare a coach in the mandated areas.

The remaining Subparts of proposed 5 MCAR § 1.0533 not discussed in the paragraph above are found to be both needed and reasonable. However, to better enable a school district to manage coach availability on the local level, the Board should consider allowing school districts with qualified staff to offer an alternate route program on an in-house basis. The Board could monitor these programs through its approval process.

To cure the defects in the proposed rule pointed out above, the following is suggested:

a. Eliminate the maximum credit requirement in Subpart D. There is not enough evidence in the record to support the reasonableness of any other maximum, short of what the institutions are now requiring; and

b. Allow Board approved alternate route licensure programs on the local level, administered by the school district itself, and either c. or d.

c. If the teacher-license requirement is kept in Subparts A. and F., the hardship provision, Subpart H., should be amended to allow for the provisional licensure of teachers or non-teachers, on a year-to-year basis, upon evidence submitted annually by the superintendent that:

1. The school district is unable to employ a licensed head varsity coach of interscholastic sports for the current year, and

2. The person to be employed under such authorization has experience in the sport and can demonstrate the fundamental knowledge and skill necessary for coaching the sport, and

3. Verification of completion of six quarterhours or 60 clock hours of instruction in first aid and the prevention and care of athletic injuries.

d. Amend Subpart A. as suggested by Judy Johnson to allow baccalaureate degreed persons to become licensed head coaches after completion of the education requirements; eliminate the teaching license requirement in Subpart F.; and amend Subpart H. to allow for the provisional licensure of both teachers and baccalaureate degreed persons.

Based upon the foregoing Findings of Fact, the Hearing Examiner makes the following:

CONCLUSIONS

1. That the Board of Education gave proper notice of the hearing in this matter.

2. That the Board has fulfilled the procedural requirements of Minn. Stat. § 15.0412, subd. 4-4f (1980) and all other procedural requirements of law or rule.

3. That the Board has demonstrated its statutory authority to adopt the proposed rules and has fulfilled all other substantive requirements of law or rule within the meaning of Minn. Stat. §§ 15.0412, subd. 4e,and 15.052, subd. 3(4)(i) and (ii) (1980).

4. That the Board has documented the need for and reasonableness of its proposed rules with an affirmative presentation of facts in the record within the meaning of Minn. Stat. § 15.0412, subd. 4c (1980), except as noted at Finding 18.

5. That the Hearing Examiner has suggested action to correct the defects cited in Conclusion 4 as noted at Finding 18.

6. That due to Conclusion 4, this Report has been submitted to the Chief Hearing Examiner for his approval pursuant to Minn. Stat. § 15.0412, subd. 4(d) (1980).

7. That any Findings which might properly be termed conclusions, and any conclusions which might properly be termed Findings are hereby adopted as such.

8. That a finding or conclusion of need and reasonableness in regard to any particular rule subsection does not preclude and should not discourage the Board from further modification of the proposed rules based upon an examination of the public comments, provided that no substantial change is made from the proposed rules as originally published, and provided that the rule finally adopted is based upon facts appearing in this rule hearing record.

Based upon the foregoing Conclusions, the Hearing Examiner makes the following:

RECOMMENDATION

It is hereby recommended that the proposed rules be adopted in accordance with the Findings of Fact and Conclusions set forth above.

Dated this 13 day of May, 1981.

Peter C. Erickson

PETER C. ERICKSON
Hearing Examiner

EDU-81-002-PE

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE DEPARTMENT OF EDUCATION

In the Matter of Proposed Adoption of a Rule of the State Board of Education Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR S 1.0533.

REPORT OF THE CHIEF HEARING EXAMINER

The above-entitled matter came on for review by the Chief Hearing Examiner pursuant to the provisions of Minn. Stat. § 15.0412, subd. 4d (1980) which provides in part:

> If the [hearing examiner's] report contains a finding that the proposed rule is substantially different from that which was proposed at the public hearing, or that the agency has not met the requirements of section 15.0412, subdivisions 4 through 4f, it shall be submitted to the chief hearing examiner for approval. If the chief hearing examiner approves the finding of the hearing examiner, he shall advise the agency of actions which will correct the defects, and the agency shall not adopt the rule until the chief hearing examiner determines that the defects have been corrected. If the chief hearing examiner determines that the need for and reasonableness of the rule has not been established pursuant to subdivision 4, clause (c), and if the agency does not elect to follow the suggested actions of the hearing examiner to correct that defect, then the agency shall submit the proposed rule to the legislative commission to review administrative rules for the commission's advice and comment. The agency shall not proceed to adopt the rule until it has received and considered the advice of the commission; provided, that the agency is not required to delay adoption longer than 30 days after the commission's receipt of the agency's submission.

Based upon a review of the record in this proceeding, the Chief Hearing Examiner hereby approves the Report of the Hearing Examiner in all respects and specifically as to any finding of substantial change or of failure to comply with Minn. Stat. § 15.0412, subd. 4-4f (1980) or of failure to establish need for and reasonableness of the proposed rule.

In order to correct the defects enumerated by the Hearing Examiner, the agency shall either take the action recommended by the Hearing Examiner or reconvene the rule hearing if appropriate. If the agency chooses to reconvene the rule hearing, it shall do so as if it is initiating a new rule hearing, complying with all substantive and procedural requirements imposed on the agency by law or rule.

If the agency chooses to take the action recommended by the Hearing Examiner, it shall, prior to submitting the rules to the Attorney General for review, submit to the Chief Hearing Examiner a copy of the rules as initially published in the State Register, a copy of the rules as proposed for final adoption in the form required by the State Register for final publication, and a copy of the agency's Findings of Fact and Order Adopting Rules. The Chief Hearing Examiner will then make a determination as to whether the defect in regard to substantial change and the requirements of Minn. Stat. § 15.0412, subd. 4-4f (1980) have been corrected.

Should the agency make changes in the rules other than those recommended by the Hearing Examiner, it shall also, prior to submitting the rule to the Attorney General, submit the complete record to the Chief Hearing Examiner for a review in regard to substantial changes.

Dated: May 13th, 1981.

Duane R. Harves

DUANE R. HARVES
Chief Hearing Examiner

EDU-81-002-PE

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE STATE BOARD OF EDUCATION

IN THE MATTER OF PROPOSED ADOPTION OF A RULE OF THE STATE BOARD OF EDUCATION GOVERNING LICENSURE REQUIREMENTS FOR HEAD VARSITY COACHES OF INTERSCHOLASTIC SPORTS IN SENIOR HIGH SCHOOLS, 5 MCAR § 1.0533.

ORDER OF THE CHIEF HEARING EXAMINER

WHEREAS, a hearing was held on April 2, 1981, before Peter C. Erickson, a Hearing Examiner of the State Office of Administrative Hearings, 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 State Board of Education and;

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

WHEREAS, the State Board of Education has submitted said rules to the Chief Hearing Examiner for review pursuant to Minn. Stat. §§ 15.0412, subd. 4e and 15.052, subd. 4, and 9 MCAR § 2.111; and

WHEREAS, the Chief Hearing Examiner finds that the final proposed rules are not substantially different from those proposed at the public hearing and that the State Board of Education has cured the defects in the rule as required.

NOW, THEREFORE, upon receipt of this Order, the State Board of Education has the responsibility of submitting the complete hearing record and the rules as adopted by the State Board of Education to the Attorney General and to publish in the State Register, all pursuant to Minn. Stat. § 15.0412, subd. 4e and 4f.

Dated: July 24th, 1981.

Duane R. Harves

DUANE R. HARVES
Chief Hearing Examiner

State of Minnesota
Board of Education

Statement of Need and Reasonableness for
Proposed Rule 5 MCAR § 1.0533

Concerning: The proposed adoption of a rule governing the licensure of head varsity coaches of interscholastic sports in senior high schools.

The proposed rule 5 MCAR § 1.0533 is necessary to implement licensure standards and procedures for head varsity coaches of interscholastic sports in senior high schools. At present, only head coaches in six boys' sports are required to hold licensure. Those sports are football, baseball, basketball, track, wrestling, and hockey. A rule which was to become effective in 1972 governing licensure of coaches of interscholastic sports for girls was repealed after the Commissioner of Human Rights determined that discrimination in the applicability of two separate coaching licensure rules, with differing criteria, one for boys' interscholastic sports and one for girls' interscholastic sports, would have existed. Subsequently, numerous meetings and public hearings were conducted in an attempt to enact an equitable coaching licensure rule which would not necessitate the elimination of athletic opportunities for students in secondary schools.

Proposed licensure rule 5 MCAR § 1.0533 was developed after input and meeting with the following organizations and agencies: Minnesota Board of Teaching; Minnesota School Boards Association; Minnesota Education Association; Minnesota Federation of Teachers; Minnesota State High School League; Association of Metropolitan School Districts; Minnesota State High School Coaching Association for Boys and Girls; Minnesota State High School Athletic Directors' Association; Minnesota colleges and universities involved in teacher preparation; Minnesota Congress of Parents, Teachers and Students; and the Minnesota Association of School Administrators. These organizations responded to invitations and took part in meetings and provided input. Many other organizations were invited but did not respond. In addition, every school district in the state received a proposed draft of the rule and many of the districts did respond in writing to the proposed draft. The State Board of Education believes that the proposed licensure rule 5 MCAR § 1.0533 has had extensive input and development through the process described above, and that the proposed rule is both needed and reasonable.

5 MCAR § 1.0533 is needed to assure that those persons serving as coaches of interscholastic sports meet minimally acceptable standards. The proposed licensure rule is premised upon the assumption that coaching is teaching; therefore, this proposed rule requires head varsity coaches of interscholastic sports in senior high schools to hold a valid Minnesota elementary or secondary teaching license.

Section A. of the proposed rule addresses the requirement of a teaching license and the completion of a coaching preparation program approved by the Minnesota Board of Education leading to licensure of head varsity coaches of interscholastic sports. Programs of interscholastic sports are an integral part of the total school program and should be so designed as to be of educational value. Therefore, the Board believes that it is essential that coaches of interscholastic sports meet the licensure requirements stated in this rule and hold a Minnesota teaching license.

Section B. defines the head varsity coach as a teacher who has primary responsibility for a senior high school varsity interscholastic sport. Interscholastic sports are defined as those sports in which there is scheduled competition with athletic teams of another school within and outside the school district. A senior high school for purposes of this rule is defined as a secondary school consisting of grades 10-12 or grades 9-12 in a four-year secondary school, or grades 9-12 in a six-year secondary school. It is the position of the Board of Education that those ninth grade students taking part in varsity interscholastic sports in a four-year or six-year secondary school should be included in the licensure rule for their health and safety.

Section C. is a compromise included after previous public hearings indicated that a severe shortage of coaches will result if assistant coaches and junior high school coaches are required to hold licensure. Testimony also showed that programs would be severely curtailed and/or limited if this limitation is not included in the rule. Therefore, the proposed rule applies only to head coaches; it does not require licensure for assistant coaches and junior high coaches.

Ideally, the Board believes that assistant coaches and junior high school coaches should be prepared at least in the areas of first aid and care and prevention of athletic injuries. It is anticipated that school districts will endeavor to provide this minimal training on an inservice basis for assistant coaches and junior high school coaches. The decision not to require licensure for assistant and junior high school coaches is based upon several factors. The Board recognizes that there has been a vast increase in school athletic programs and in participation, particularly for girls. This fact, together with declining enrollments and associated declines in school revenues, has created problems for staffing of the programs. The Board believes that by excluding assistant and junior high school coaches from the licensure requirement, the vast majority of the staffing problems will have been eliminated. It should be recognized, however, that no licensure rule will eliminate all staffing problems and should not be expected to do so.

Section D. of the proposed rule specifies the qualifications for coaching licensure. It is designed to contain the components determined by previous task forces to provide essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport. It should be noted that the rule establishes a maximum of 12 quarter or 9 semester hours of credit for all coaching programs that are submitted to the Board of Education for approval.

The Board recognizes that this attempt to limit programs to 12 quarter or 9 semester hours of credit may be opposed by a number of Minnesota colleges and universities. A number of colleges and universities will state that they are unable to prepare coaches with such a restricted number of credits. While many of the coaching programs in Minnesota colleges and universities currently range from 30 to 40 quarter hours of credit, it is the position of the Board that programs of such length are unnecessary to provide acceptable coaching ability, are prohibitive in length, and accentuate recruiting problems at the school district level. It is the position of the Board of Education that a preparation program consisting of 12 credits is a reasonable number of credits for licensure, and that colleges will be able to redesign and restructure some of their courses to accomplish a preparation program which provides the essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport within the parameters of this rule.

The 12 credits pertain only to those teachers who desire a coaching endorsement and are not physical education majors or minors. Persons who are preparing to be physical education teachers will, as part of their program, have completed a coaching preparation endorsement. This proposed rule does not prohibit a college or university from offering a coaching minor or major or a more extensive program for those who desire more preparation. It simply requires completion of an approved program consisting of a maximum of 12 quarter credits for licensure as a coach of interscholastic sports.

Section E. of the proposed rule is an alternate route to licensure. It permits a school district to contract with a college or university which offers an approved coaching licensure program and to develop a joint program that can be offered on an inservice basis in a Minnesota school district. This portion of the rule is intended to create flexibility for those school districts that desire to prepare their own coaches on an inservice basis in conjunction with a college or university.

Section F. is a "grandperson" clause which states that teachers employed as a head varsity, assistant, or junior high school coach can be granted a coaching license provided that 6 quarter hours or 60 clock hours of instruction in first aid and the care and prevention of athletic injuries have been completed. It is the deliberate intention of Section F. to be generous in grandpersoning those teachers that have been serving as coaches and assistant coaches in order not to restrict the supply of coaches available for interscholastic coaching positions. The Board, however, does feel that no grandpersoning should occur unless evidence can be provided of the minimal preparation specified in first aid and the care and prevention of athletic injuries. It should be noted that the Department of Education will be flexible in accepting 60 clock hours of instruction on an inservice basis through the Red Cross or other appropriate agencies.

Section G. of the proposed rule establishes an effective date of July 1, 1982. This effective date is deemed reasonable because of the generous grandpersoning clause which will not curtail the present supply of coaches. In addition, it is thought to be reasonable in terms of college preparation programs because at present there are 22 Minnesota colleges and universities that offer coaching programs and the rule should not necessitate the development of any new programs.

Section H. In previous public hearings involving coaching licensure, school districts indicated that unless special provisions were made for emergency licensure they would be required to curtail or eliminate some athletic programs. Section H. of the proposed rule is intended to address hardship situations where a district may request of the Commissioner of Education a provisional license for a teacher to serve as an interscholastic coach while the preparation program is being completed in a Minnesota college or university.

This section requires that the provisional license be granted only to teachers. The Board of Education does not believe that it is necessary or responsible to include the possibility of granting a provisional license to those persons not holding a valid teaching license. The Board believes that the hardship situations that districts may face can be accommodated by the provisions outlined in Section H. of the proposed rule.

Section I. specifies that coaching licenses may be renewed under the same system that coaches use to renew their teaching licenses in other fields. It will not be necessary for coaches to follow a separate system for renewal of the coaching license.

In summary, the State Board of Education believes that this proposed coaching licensure rule is both needed and reasonable. The Board believes that the preparation outlined in the rule is the minimum amount of preparation needed to serve as a head varsity coach, while at the same time providing for any potential hardship situations that school districts may face in staffing coaching positions.

STATE OF MINNESOTA
COUNTY OF RAMSEY

BEFORE PETER C. ERICKSON
HEARING EXAMINER
OFFICE OF ADMINISTRATIVE HEARINGS

FINDINGS OF FACT AND CONCLUSIONS:

In the matter of the Proposed Adoption of Rules of the State Board of Education Governing the Licensure Requirements of Head Varsity Coaches of Interscholastic Coaches in Senior High Schools 5 MCAR § 1.0533

The above entitled matter came on for hearing before State Hearing Examiner Peter C. Erickson on April 2, 1981 at 9:00 a.m. in Conference Room D, fifth floor of the Veterans Service Building in the City of St. Paul, Minnesota. Proper notice was served on all persons, associations and other interested groups registered with the State Board of Education and upon those who filed with the Department of Education for the purpose pursuant to Minnesota Statutes § 15.0412. All interested persons were afforded the opportunity to be heard concerning the adoption of the proposed rule captioned above by the submission of either oral or written data, statements, or arguments.

After having reviewed all of the testimony and evidence submitted at the public hearing and to the Hearing Examiner, Peter C. Erickson, before the close of the hearing record, after having considered the report of the Hearing Examiner, and applicable statutory standards, after having withheld action on the proposed rule for the required period of time, after receipt of the Report of the Hearing Examiner and after having confirmed the need for the above captioned rule, the State Board of Education finds that the findings of fact of the Hearing Examiner accurately reflect the facts in the record, except as described below.

NOW THEREFORE, IT IS RESOLVED that the State Board of Education hereby adopts and incorporates herein the Report of the Hearing Examiner dated May 13, 1981, relative to the above entitled matter, except as set forth below.

1. Adopt the recommendation of the Hearing Examiner contained in Finding 13 suggesting the elimination of a maximum credit requirement for coaching licensure. In addition, adds the following: In reviewing Section D of the rule as proposed, there are five specific areas to be covered in the licensure program. Assuming that each area may encompass a three quarter credit course, the coaching program could, in effect, be covered in a 12 to 18 quarter credit program.

In testimony given at the hearing, there were numerous suggestions by college representatives with regard to a reasonable credit requirement for a coaching program. Dr. Jack Amann of Mankato State University, in testimony beginning on page 53 of the transcript of the hearing, indicated that coaches could be prepared in an 18 quarter credit program. Dr. Frank Mach of the College of St. Thomas indicated on page 89 of the transcript of the hearing that coaches could be prepared in a 14 semester hour program which is equivalent to the 18 quarter hour requirement mentioned in Section D. Dr. Tom Porter, Chairman of the Physical Education Department at St. Olaf College, indicated in testimony beginning on page 46 of the transcript of the hearing that he and several of his colleagues believe that coaches can be prepared in a program consisting of 9 semester to 15 semester credit hours or 12 to 18 quarter hours.

The use of a range of credits for preparing coaches was supported by the hearing record. Dr. Porter and others felt that this would be a satisfactory compromise. In addition, the use of a range satisfied the expressed concerns that institutions want flexibility and diversity among themselves in developing coaching programs.

Therefore, 5 MCAR § 1.0533-D. would read as follows:

D. Qualifications for licensure. All candidates recommended for licensure as a head varsity coach of interscholastic sports shall have satisfactorily completed a program approved by the Minnesota Board of Education consisting of ~~a maximum of~~ 12 ~~quarter or 9 semester~~ to 18 quarter hours or the equivalent containing components designed to provide candidates recommended for licensure with knowledge skills, and understandings in all of the following areas:

2. Adopt Section E as originally proposed in accordance with Finding 18 Paragraph 3, indicating that the remaining subparts (including Section E) of the proposed rule are both needed and reasonable. In addition, add the following findings: Testimony brought out during the hearing indicated that colleges have the expertise to prepare athletic coaches. The rule gives school districts flexibility to call upon the expertise of colleges to prepare their own coaches on an inservice basis as outlined in the Hearing Examiner's finding 13.a. There was no evidence presented at the hearing to demonstrate that school districts have the expertise to prepare athletic coaches.

3. Adopt Section H., pertaining to school district hardship situations, according to Hearing Examiner's conclusion 4 and finding 18.c. and as modified below. Further findings affecting this section are contained below.

Adopt Section H.2., as modified, according to finding 9, page 6, of the Report of the Hearing Examiner, except adds the following: Comments by Judy Johnson and Dr. Frank Mach on pages 58 and 87 of the transcript of the hearing support the inclusion in rule of a baccalaureate degreed non-teacher as varsity coach. A baccalaureate degreed person licensed as head varsity coach will more likely possess a level of maturity and sensitivity to coach senior high school athletic sports. This baccalaureate requirement, along with Mr. Erickson's suggestion that the person meet other standards, responded to comments to permit the granting of provisional licensure so that the so called burden imposed by the previous rule is relieved.

Section H has been modified to permit school districts to apply for a provisional license on a year-to-year basis for a teacher or baccalaureate degreed non-teacher to serve as a head varsity coach of an interscholastic sport in a senior high school.

Adopt Section H.3., as modified in accordance with finding 18, section 3, 1, 2, and 3 as contained in the Report of the Hearing Examiner. Language has been included to permit persons to demonstrate that they have the fundamental knowledge and skills necessary for coaching an interscholastic sport.

Adopt Section H.4., as recommended in the Report of the Hearing Examiner, conclusion 4, requiring persons issued coaching licenses under the hardship clause of this rule to verify completion of 6 quarter credits or 60 clock hours of instruction in first aid, and the care and prevention of athletic injuries.

Therefore, 5 MCAR § 1.0533, H. would read as follows:

H. School district hardship situations. In cases where a local school district is unable to employ a licensed head varsity coach of interscholastic sports, the superintendent of such school district may request the commissioner of education to grant a provisional license for one school year, ~~and~~ renewable ~~for a maximum of one additional school year~~ upon application on a year to year basis to a teacher or a baccalaureate degreed person to serve as a head varsity coach of an interscholastic sport upon evidence submitted by the superintendent of schools that the following conditions have been met.

H.2. The person to be employed under such authorization holds a current, valid Minnesota teaching license~~, and~~ or a baccalaureate degree, and

H.3. The person to be employed under such authorization ~~is currently enrolled in a program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches of interscholastic sports.~~ has experience in the sport and can demonstrate to the superintendent of schools that he/she has the fundamental knowledge and skills necessary for coaching the sport, and

H.4. Verification of completion of six quarter hours or 60 clock hours of instruction in first aid and the care and prevention of athletic injuries.

4. The State Board of Education has carefully reviewed all comments submitted to the Hearing Examiner and expressed to the State Board prior to the adoption of the rule for the licensure of head varsity coaches of interscholastic sports in senior high schools.

5. The State Board of Education finds that the rule, as amended, is both needed and reasonable.

Aug. 11, 1981
Date

Secretary, Board of Education

SF-00006-01

STATE OF MINNESOTA

Office Memorandum

DEPARTMENT of Education

TO : Lois Steinhaus
Education Statistics

DATE: March 12, 1981

FROM : George B. Droubie, Manager
Personnel Licensing and Placement

PHONE: 6-2046

SUBJECT: Testimony on Coaching Licensure

Following is a list of persons and organizations who will be testifying as part of the Department of Education's presentation in favor of the proposed rule.

1. Minnesota Education Association - Dan Moriarty
2. Minnesota Federation of Teachers - Edward Bolstad or Al Olson
3. Minnesota State High School League - Dorothy McIntyre
4. Minnesota Parent, Teacher, Student Association - Van Mueller

Please forward this information to Peter Erickson. Thank you for your assistance in this matter.

GBD/pac

State of Minnesota
State Board of Education
Department of Education

In the Matter of the Proposed Adoption of the Rules of the State Board of Education Governing the Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR S 1.0533

AFFIDAVIT OF MAILING NOTICE OF SUBMISSION TO THE ATTORNEY GENERAL

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

Dennis C. Carlson, being first duly sworn, deposes and says:

That on the 25th day of August, 1981, in the City of St. Paul, County of Ramsey, State of Minnesota, he served the attached Notice of Submission to the Attorney General by depositing in the State of Minnesota Central Mail System for United States mailing at said City of St. Paul, a copy thereof, properly enveloped, with postage prepaid, on all persons and associations who requested notice that the hearing record, has been submitted to the Attorney General.

Dennis C. Carlson

Subscribed and sworn to before me
this 25 day of August,
1981.

Luana Vadnais

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

State of Minnesota
State Board of Education
Department of Education

In the Matter of the Proposed Adoption of
the Rules of the State Board of Education
Governing the Licensure Requirements for
Head Varsity Coaches of Interscholastic
Sports in Senior High Schools 5 MCAR S 1.0533

NOTICE OF
SUBMISSION TO THE
ATTORNEY GENERAL

Pursuant to your request and in accordance with Minnesota Statutes, section 15.0412:

PLEASE TAKE NOTICE that the above-captioned rules have been submitted to the Office of the Attorney General on this date, August 25, 1981, for review as to form and legality. Pursuant to 1 MCAR S 1.206 C., the Attorney General will not approve the rules for ten calendar days after receipt to allow any person or association time to comment on the legality of the rules, after which that Office will complete its review. If you desire to comment on the legality of the above-captioned rules, you should direct your comments to the Office of the Attorney General, G-25 State Administration Building, 50 Sherburne Avenue, St. Paul, Minnesota 55155, telephone (612) 296-7030. Please note that the above-cited rule of the Attorney General also provides that a copy of any written comments submitted to the Attorney General must be submitted simultaneously to this agency.

If you are interested in determining what changes, if any, were made in the proposed rules after the hearing and before submission to the Attorney General you may contact George B. Droubie, Manager, State Department of Education, Personnel Licensing and Placement, 610 Capitol Square Building, 550 Cedar St., St. Paul, Minnesota 55101, or telephone (612) 296-2046.

John J. Feda, Secretary
State Board of Education

Certificate of Board's
Resolution Adopting Rules

I, John J. Feda, do hereby certify that I am secretary of the Board of Education, a Board duly authorized under the laws of the State of Minnesota, and that the following is true, complete, and correct copy of a resolution adopted at a meeting of the Board of Education, duly and properly called and held on the 11th day of August, 1981, 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 the rule governing the licensure requirements of head varsity coaches of interscholastic sports in senior high schools hereby is approved as amended and adopted pursuant to the authority vested is us by Minn. St. 125.05, as amended by Laws of 1980, Ch. 345, S. 2 and that one of the members of the Board of Education be and hereby is authorized to sign an order adopting this rule.
>
> BE IT FURTHER RESOLVED that if, after review by the Chief Hearing Examiner and the Attorney General, it should be deemed appropriate by the Commissioner of Education to make changes in the rules as adopted herein, the Commissioner is hereby authorized to make any changes permitted by law which do not result in a substantially different rule and to sign an amendment to the order adopting the rules.

IN WITNESS WHEREOF, I have hereunto subscribed my name the 11th day of August, 1981.

John J. Feda
Secretary, State Board of Education

Patricia Huber
Member, State Board of Education

In the Matter of the Proposed Adoption of Rules of the State Board of Education Governing Licensure of Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR § 1.0533

STATEMENT OF COMPLIANCE WITH RULEMAKING PROCEDURES

I, Special Assistant Attorney General Sheila S. Fishman, do hereby declare that I have examined the rules and all related documents and that, based on my examination and my personal familiarity with the applicable procedures, the Administrative Procedure Act, the rules of the Office of Administrative Hearings, and the rules of the Attorney General have been followed. Any exceptions are noted below.

Sheila S. Fishman
Special Assistant
Attorney General

Dated: Aug 24, 1981

April 2, 1981 (1)

RULE HEARING REGISTER

PLEASE PRINT CLEARLY

If you wish to be notified when the Hearing Examiner's Report is available, please put your name and address on one of the envelopes supplied.

NAME	REPRESENTING	COMPLETE ADDRESS	TELEPHONE	CHECK HERE IF YOU WISH TO MAKE A STATEMENT AT THE HEARING	CHECK HERE IF YOU WISH TO BE NOTIFIED BY THE AGENCY WHEN THE HEARING RECORD HAS BEEN SUBMITTED TO THE ATTORNEY GENERAL
Jim Mitchell	Fairmont Schools	115 S. Park Fairmont, Minn	507-238-4234	yes —	
Richard Hill	Duluth Schools	Cable Area 2nd St. Duluth 55807	723-4108		✓
Tom Porter	St. Olaf College	North Field, Minn. 55057	(507) 663-3251	yes —	✓
Alan C. Page	Black School	4200 IDS Center Mpls 55402	371-3211	yes —	✓
Jack Lenkenni	Mankato State Univ.	P.O. 28 MSU Mankato MN 56001	389-6715	yes —	✓
LeRoy Brown	MN Catholic Conf.	296 Chester St. St. Paul 55107	227-8777		✓
Judy Johnson	MN Coaches Assoc. for Girls Sports	Burnsville High School 600 E Hwy. 13 Burnsville 55337	887-7359	yes —	✓
Joe Anderson	BLACK SCHOOL	2366 ROSE PL ST PAUL 55113	636-4320		
Bill McMoore	Mpls Public Schools	807 N.E. Broadway, Mpls 55413	348-6080	✓ —	✓
Rex Domino	Dover-Eyota High School	Eyota, Mn. 55934	507-545-2631	✓ —	✓
Jerry Bernatz	Chatfield High School	Chatfield, MN 55923	507-867-4210		✓
Alan Olson	MFT	175 Aurora Ave	227-8583	✓ —	✓
Dan Moriarty	MEA	41 Sherborne Ave.	227-9541	✓ —	✓
Elmer O Johnson	State Bd. Educ	832 Eastwood Lane, Anoka, Mn.	427-1442		
Dorothy Darling	John Marshall	Rochester, MN. 55901	285-8669		✓
Patricia Smith	MN COACHES ASSN FOR GIRLS & JANESVILLE H.S. SPORTS	JANESVILLE H.S., JANESVILLE MN 56048	234-5181		✓
Dale C. Vaughan	Shakopee High School	Shakopee, Mn. 55379	445-1481		✓
R L Thiele	St Paul Suburban Conf	5040 BALD EAGLE AVE White Bear Lake 55110	429-5391	✓ —	✓
Roger B Worner	White Bear Lake Schools	Willow Avenue, White Bear Lake, MN 55110	429-5391	✓ —	✓

April 2, 1981 (2)

If you wish to be notified when the Hearing Examiner's Report is available, please put your name and address on one of the envelopes supplied.

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Joe DeKlepper	Shakopee H.S.	10th & Lewis, Shakopee	445-4884		
CORALYNN R. CARL	BLAKE SCHOOL	511 Kenwood Pkwy - 55403 MPLS	377-5800		✓
Clifford J. Carrie	St Paul Academy	1712 Randolph 55105 St. Paul	698-2451		✓
SKIP PELTIER	SO. WASH. CO. SCH.	7667 IVYSTONE 55016 Cottage Grove	459-5571		✓

April 2, 1981 (3)

If you wish to be notified when the Hearing Examiner's Report is available, please put your name and address on one of the envelopes supplied.

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DOROTHY E. McINTYRE	MSHSL	2621 Fairoak Ave	427-5250		
Jeff Chinn	State University System	404 Capitol Square	296 6870		
SCOTT KEPHART	MARINER HIGH SCHOOL	3351 N. MCKNIGHT RD, WHITE BEAR LK. 55110	429-5391		
DAVE MONTGOMERY	ST PAUL ACADEMY	1712 Randolph St Paul	698 2451		✓
Richard J. Anderson	MSBA	Box 119 St. Peter, MN 56082	336-9141		✓
FRANCES BLEICK	SCSU	1419 9th AVE SO. ST CLOUD MN 56301	255-3150		✓
FRANK MACH	College of ST. THOMAS	2115 Summit Ave., St. Paul, MN.	647-5356	✓ —	✓
KENNETH PEATROSS	Board of Teaching	608 Capitol Sq Bldg St Paul 55101	296-2415	✓ —	
BONNIE O'HARE	COLLEGE OF ST. CATHERINE	2004 RANDOLPH AVE. ST. PAUL 55105	690-6705		✓
MARGARET MOORE	Moorhead STATE U.	HPER, MSU, Mhd, MN 56560	236-2445		
Nancy Moe	St. Olaf College	Northfield, MN 55057	663-3255		

LAW OFFICES

LeFEVERE, LEFLER, KENNEDY, O'BRIEN & DRAWZ

1100 FIRST NATIONAL BANK BUILDING
MINNEAPOLIS, MINNESOTA 55402
TELEPHONE (612) 333-0543

BROOKLYN CENTER OFFICE
103 BROOKLYN LAW CENTER
5637 BROOKLYN BOULEVARD
BROOKLYN CENTER, MINNESOTA 55429
(612) 536-8037

CLAYTON L. LeFEVERE
HERBERT P. LEFLER
J. DENNIS O'BRIEN
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DAYLE NOLAN
CINDY L. LAVORATO

RICHARD J. SCHIEFFER

April 15, 1981

RECEIVED
APR 15 1981
ADMINISTRATIVE HEARINGS

Mr. Peter Erickson
Hearing Examiner
Office of Administrative Hearings
Room 300
1745 University Avenue
St. Paul, MN 55104

Re: The Statement of Need and Reasonableness for Proposed Rule 5 MCAR §1.0533

Dear Mr. Erickson:

This letter is in response to your telephone conversation of April 14, 1981, with Mary Bjorklund in which you agreed that we would submit comments regarding the above proposed rule to you by letter. This letter is for the purpose of expressing some of the concerns of the Association of Metropolitan School Districts regarding the above proposed rule.

The Minnesota Administrative Procedure Act, §15.053, Subd. 3, requires that the Hearing Examiner take notice of the degree to which the agency has demonstrated the need for and reasonableness of the proposed action with affirmative presentation of the facts. The Association submits that the State Board of Education has failed to meet the statutorily prescribed standard of demonstrated need for the proposed rule. The Statement of Need and Reasonableness does not provide facts sufficient to determine the basis upon which the agency determined the need for the proposed rule. The statement is merely a summary of what the agency has done up to this point, and it outlines only the major developments which occurred in the promulgation of the proposed rule. No facts are presented in the Statement of Need which would substantiate the adoption of that proposed rule.

In addition, the summary that is presented by the Statement of Need is not complete or accurate. In Section C, for example, the statement reads as follows:

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> Section C is a compromise included after previous public hearings indicated that a severe shortage of coaches will result if assistant coaches and junior high school coaches are required to hold licensure. Testimony also showed that programs would be severely curtailed and/or limited if this limitation is not included in the rule. Therefore, the proposed rule applies only to head coaches; it does not require licensure for assistant coaches and junior high coaches.

This is an inaccurate statement of the events as they occurred. The testimony at previous public hearings included the illustration that a severe shortage of coaches would result if assistant coaches and junior high school coaches were required to be licensed. That testimony was merely a statement of illustration and not of limitation, however. There was and will continue to be a problem if any coaches (including head coaches) are required to be teachers in order to be licensed.

An additional illustration of the lack of facts substantiating the need and reasonableness of the proposed rule is demonstrated by Section F which requires that teachers employed as coaches be granted a coaching license after six quarter hours of instruction in first aid and the care and prevention of athletic injuries. No factual determination was made establishing that a person is better able to provide the necessary first aid because he is a teacher. There is no relationship shown between the ability to provide these services and a person's occupation as a teacher.

Finally, the proposed rule violates the legislative intent of Minn. Stat. §125.05 as it was amended in 1980. That statute now reads as follows:

> Subdivision 1. Qualifications. The authority to license teachers as defined in §125.03 is vested in the Board of Teaching except that the authority to license supervisory and support personnel is vested in the State Board of Education.

This legislative amendment occurred because the State Board of Teaching attempted to adopt rules similar to the above proposed rule requiring coaches to be licensed. The legislature, by vesting the authority to license coaches and other support personnel in the State Board of Education rather than the Board of Teaching, indicated its position that coaches' rules were not necessary. The State Board of Education, by proposing the amendment to Rule 5 MCAR §1.0533, is attempting to do what the legislature prevented the State Board of Teaching from doing in the very recent past.

There is an extreme shortage of coaches in the metropolitan area. Part of this shortage is occurring because teachers are now more chronologically mature and better paid than they have been in past years. As a consequence, they are less motivated to donate their time to coaching activities than they have been in the past. As a result, the school districts have been obliged to rely on nonteachers to provide the coaching instruction necessary for the athletic program. To require that the coaches be teachers will almost certainly necessitate the elimination of athletic opportunities for students in many secondary schools.

The Statement of Need provides us with only two sentences addressed to the requirement of need and reasonableness for the license to be granted to only teachers. The Board of Education states that it "does not believe that it is necessary or responsible to include the possibility of granting a provisional license to those persons not holding a valid teaching license. The Board believes that the hardship situations the districts may face can be accommodated by the provisions outlined in section (H) of the proposed rule."

The second reference to the requirement that the coaches be teachers is contained in section (A) which states that "programs of interscholastic sports are an integral part of the total school program and should be so designed to be of educational value. Therefore, the Board believes that it is essential that coaches of interscholastic sports meet the licensure requirements stated in this rule and hold a Minnesota teaching license."

A statement that the Board "believes" that it is essential for coaches to be teachers does not fulfill the requirement of a factual showing of need or reasonableness. It certainly does not balance the demonstrated showing of the hardship that will occur if the interscholastic sports programs are terminated at many secondary schools in Minnesota.

Respectfully submitted,

J Den O'Brien

J. Dennis O'Brien
Counsel for the Association of
Metropolitan School Districts

JDO:kk

PE

The Rochester Public Schools
Independent School District 535

DIRECTOR OF SECONDARY EDUCATION

RECEIVED
APR 15
ADMINISTRATIVE HEARINGS

April 13, 1981

Peter Erickson
Hearing Examiner
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

I would like to compliment the various individuals and agencies that have taken the time to review proposed rules and regulations governing licensure requirements.

However, I have some serious concerns regarding the proposed changes in the rules and regulations governing licensure requirements for head varsity coaches of interscholastic sports in senior high schools.

The licensure requirements, as they are being proposed, would necessitate candidates to have both teacher and coaching licensure. At the present time, as we prepare for our 1981-82 staffing, we in the Rochester Public Schools will have at least 25 coaching vacancies, of which six to eight will be head coaching positions. With reduction of staff due to declining enrollments, and the proposed regulations, we face an almost impossible situation, which would most likely result in a reduction of program offerings, rather than maintaining opportunities for participation for our students. Therefore, we feel that it would be more practical to require a college degree with coaching licensure. This would not totally solve the problem of limited coaching candidates, but would without question make it more feasible for the maintenance or continuance of present programs.

We have further concerns with 5 MCAR 1.0533, especially section H., which deals with hardship situations. We strongly agree with the appropriateness of having the hardship clause in any proposed rule and regulations proposal. My concern is that the proposed hardship clause would make it impossible for a school district, such as ours, to apply for the hardship clause if indeed we had a candidate who held a teacher's licensure and was enrolled in a program providing coaching licensure, when we felt the candidate did not possess other qualities necessary to fulfill the position. If we were to pass over such a candidate it is my understanding that we would not qualify for the hardship clause.

At the present time we are requiring all of our coaches to take part in an inservice program that takes care of first aid care.

Coffman Building · Rochester, Minnesota 55901 · Telephone 507-285-8595

We do however, feel it is not appropriate to include theory and practice of sports techniques, psychology of sports and coaching, and the satisfactory completion of a supervised field experience in coaching consisting of no fewer than 40 clock hours.

The adoption of the licensure requirements, as proposed, would without question lead to the elimination of interscholastic programs in Minnesota due to the lack of "qualified" candidates for filling coaching vacancies.

Sincerely yours,

Robert E. Endersbe
Director of Secondary Education

REE/mm

CC: Dr. Vakos
Dr. Walton
Mr. Engelhart

Winona State University

Winona, Minnesota 55987

Telephone (507) 457-2110

RECEIVED
APR 20 1981
ADMINISTRATIVE HEARINGS

April 14 1981

Mr. Peter Erickson, Hearing Examiner
1745 University Avenue - Room 300
St. Paul, MN 55104

Dear Mr. Erickson:

Re: Proposed 5 MCAR 1.0533 - Head Varsity Coaches

Maximum number of credits: It is our feeling that setting a required maximum number of credits deprives us of institutional autonomy in determining curriculum for an approved program.

Rule limited to varsity coaches: Equally, if not more important than requirements for varsity coaches, is the need for minimum requirements for junior high and coaches of minor sports.

Areas of competency (Section D): Competence in the designated areas (Section D) is an impossible task within 12 quarter hours of credit.

Sincerely,

W. J. Matson

Wesley J. Matson
Dean of Education

WJM/mp

An Equal Opportunity Employer

RECEIVED
APR 3 1981
ADMINISTRATIVE HEARINGS

April 1, 1981

TO: Mr. Peter Erickson, Hearing Examiner
FROM: Board of Directors of the Minnesota School Boards Association
RE: Proposed Rules Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports

The Board of Directors of the Minnesota School Boards Association, having followed the development of the proposed rule over a long period of time, believes the current version to be the best attempt thus far at resolving the sensitive issues raised by the proposal.

As in the past, MSBA can philosophically and idealistically support the current proposal. However, the counterproductive forces at work several years ago have accelerated in their impact upon the secondary school since the first proposals were brought to public hearing in the mid 1970's. Staff maturity, declining enrollments and tight financial conditions have, are and will continue to be very serious practical problems for school districts to cope with in seeking to comply with the proposed rule, while at the same time attempting to maintain a full array of quality athletic opportunities for the state's young people.

It is because many school districts have contacted our office expressing their concern about the ramifications of the combination of the practical problems cited above with the requirement that a licensed head varsity coach of interscholastic sports be a currently licensed teacher that the Board of Directors of the Minnesota School Boards Association cannot support the proposed rule.

Enough evidence has been presented to the Hearing Examiner on previous occasions to substantiate the practical problems faced by school districts in attempting to comply with the proposed rule. MSBA believes that the proposed rule would be greatly improved and acceptable by the removal of the requirement that a head coach of a varsity interscholastic sport be a validly licensed teacher.

It should be remembered that coaching would be a minor function on a teaching license and that for the most part coaching assignments are not part of the teacher's individual continuing contract, but are established as an extra-curricular function which generally is agreeable to both the employer and the employee. The requirements in the proposal to possess a valid teaching license and, therefore, subject to continuing education place life licensed personnel under a system whereby 120 renewal units will be required for a minor function which is usually voluntary in nature. The inherent inequity in time and cost is significant.

The liability factor is often raised as a major reason for the need for the proposed rule. MSBA believes that licensure will not prevent liability suits in athletics. The significant aspect relative to athletic injury is training for personnel in care and prevention and first aid. Licensure is not significant except as a deterrent to athletic opportunity for students. School districts will be involved in athletic tort cases with or without licensure. It is their responsibility to staff with "qualified" individuals. In the final analysis school districts stand alone in each tort situation on the merits of the facts in each individual case and not on the basis of licensure.

In conclusion MSBA can support the proposed rule if the teaching licensure requirement were removed. If the Hearing Examiner has any further questions, please contact the Association office.

Respectfully submitted,

W. A. Wettergren
Executive Secretary
Minnesota School Boards Association

WAW:RJA:sh

Copy to: State Board of Education
Commissioner Casmey
Gregory Waddick
Representative Carl Johnson
Representative Tony Stadum
Senator Gene Merriam

MINNESOTA STATE HIGH SCHOOL LEAGUE
2621 FAIROAK AVENUE • ANOKA, MINNESOTA 55303
Phone: (612) 427-5250

MURRAE FRENG
EXECUTIVE DIRECTOR

ORVAL BIES
ASSISTANT TO THE EXECUTIVE DIRECTOR

MARVIN HELLING
ASSOCIATE EXECUTIVE DIRECTOR

DOROTHY McINTYRE
ASSISTANT TO THE EXECUTIVE DIRECTOR

March 24, 1981



Dr. George Droubie, Director
Teacher Certification and Placement
Department of Education
Capitol Square Building
550 Cedar
St. Paul, Minnesota 55101

Dear Dr. Droubie:

The Board of Directors of the Minnesota State High School League, at its regular meeting on March 11, 1981, reviewed the proposed rules for licensure of head varsity coaches.

It was moved and seconded that the MSHSL Board of Directors be recorded as supporting the proposed rules for licensure of head varsity coaches. The motion passed by unanimous vote.

Yours very truly,

Murrae Freng

Murrae N. Freng
Executive Director

MNF:jsw

44

OSLO PUBLIC SCHOOLS

INDEPENDENT SCHOOL DISTRICT NO. 442

OSLO, MINNESOTA 56744

PHONE 218-695-2121

RECEIVED
MAR 18 1981
ADMINISTRATIVE HEARINGS

ADMINISTRATION
VERN E. PFEIFER, SUPERINTENDENT
DERRILL J. LIFFRIG, PRINCIPAL

JOHN GERSZEWSKI, CHAIRMAN
THOMAS GERSZEWSKI, CLERK
WAYNE LINDROTH, TREASURER
RONALD EIDE, DIRECTOR
WILLIAM MICHALSKI, DIRECTOR
WELDON McFARLAND, DIRECTOR

March 11, 1981

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

The Board of Education and the administration of Independent School District #442 are concerned about the proposed rule governing licensure for Head Varsity Coaches.

As a smaller school district with a declining enrollment, we have a staff with practically no turnover. As we are forced to cut back staff on the basis of seniority, we find ourselves in the situation where we must cut some of our younger teachers who normally do the coaching. In addition senior members of the staff leave coaching as they no longer feel able to handle the additional duties. The combination of these things results in the lack of certified people on our staff that could meet the criteria of the proposed rules.

Since the possibility of finding a qualified person in the community the size of Oslo who could meet the criteria proposed, we would be forced to discontinue the activity. The students would then be the ones to be penalized.

Many small districts are in similiar situations as Oslo. Instead of being benificial to interscholastic sports, this requirement would have a detrimental effect on interscholastic sports in the small school. For these reasons, we feel that this proposed rule be not favorably considered.

Sincerely,

Vern E. Pfeifer

Vern E. Pfeifer
Superintendent

45

Red Lake Falls Public Schools

RECEIVED
MAR 23 1981
ADMINISTRATIVE HEARINGS

Office of Superintendent — 253-2165
Lafayette High School — 253-2163
Washington Elementary School — 253-2161

INDEPENDENT SCHOOL DISTRICT 630
Red Lake Falls, Minnesota 56750

March 19, 1981

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

I would like to have entered the following testimony on the proposed rule on licensure of coaches.

I am opposed to any type of licensure required of coaches as it places a hardship on the small schools such as mine.

I am vehemently opposed to the restriction that a coach has to be a licensed teacher.

When I have to fire my least tenured social studies teacher, I will also be losing my hockey coach.

I have no other teachers that would coach hockey, but there are people in the community that would coach it but they aren't licensed teachers.

I see no logical reason why a coach has to be licensed anyway. All that needs to be done is a requirement that the obtain X hours of first aid and coaches training. They don't need a license!

Yours truly,

Claude Sheldon

Claude Sheldon
Superintendent of Schools

CS;km

46

RECEIVED
MAR 26 1981
ADMINISTRATIVE HEARINGS

Remer/Longville
INDEPENDENT SCHOOL DISTRICT #118

BOX 37
REMER, MINNESOTA 56672
PHONE (218) 566-2351

THOMAS JACOBSON
SUPERINTENDENT

R. J. GUNDERSON
BUSINESS MANAGER

March 24, 1981

Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

The proposed rule 5 MCAR 1.0533 "Head varisty coaches in senior high schools" will seriously jeopardize the athletic programs and offering of smaller school districts if adopted. While the intent of the proposed rule, assurance of trained coaches can not be argued against, the reality of providing certified coaches for all interscholastic senior high sports would cause us to cut back on our present sports offerings.

Our school system presently offers nine interscholastic senior high sports. If we had to guarantee certified coaches who were also licensed teachers, we would only be able to offer three to five interscholastic senior high sports. It would also severely curtail our junior high school sports program because some of our licensed coaches who prefer to work with junior high school athletics would have to be assigned senior high school athletics.

Some of our best and most dedicated coaches are community members (non-teachers) who are former athletes. To exclude them would be a loss to the students and the program. Adopting this rule would effectively eliminate them.

Sincerely,

Thomas Jacobson

Thomas Jacobson
Superintendent of Schools

TJ/jb

THE BISHOP WHIPPLE SCHOOLS
SHATTUCK / SAINT MARY'S / SAINT JAMES
FARIBAULT, MINNESOTA 55021
(507) 334-6466

47

RECEIVED
MAR 6 1981
ADMINISTRATIVE HEARINGS

March 4, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

The Bishop Whipple Schools (Shattuck/Saint Mary's), a private, Episcopal, coeducational, college-preparatory boarding school of over 200 students is located in Faribault, Minnesota. As Interim Headmaster, I am writing in regard to your January 12, 1981, communication "In the matter of proposed adoption of a rule of the State Board of Education governing licensure requirements for head varsity coaches of Interscholastic sports in senior high schools."

Aside from our concern about the continuing expansion of state regulations and the concomitant costs of administering and enforcing them, this proposed rule flies in the face of the school's basic philosophy, which is that all of our coaches be classroom teachers as well as coaches. In addition all of our teachers must also serve as dormitory supervisors and surrogate parents for our students who come here from some 15 states and at least 8 foreign countries. We already abide by all of the rules of the Centennial Conference of the Minnesota State High School League, Region IV-A, District 13, but the cost of hiring additional varsity coaches, not equipped to teach academic subjects or to serve as dormitory parents, would be excessive. None of our present coaches are either incompetent or untrained in the sports they coach, but they also must be outstanding classroom teachers and skilled in appropriate supervision of adolescent boys and girls who reside here in dormitories on our campuses from early September to early June.

The promulgation of this proposed rule and the additional personnel required would create a crushing financial burden for these Episcopal boarding schools and could conceivably result in the extinction of the historic mission they have fulfilled since 1858 here in Minnesota.

Two sons of the late Senator Hubert H. Humphrey, as well as Bud Wilkinson, of Oklahoma football fame, and many other distinguished citizens of Minnesota and the nation, attended these schools because of the quality of their academic and athletic programs.

It has been said that "the power to tax is also the power to

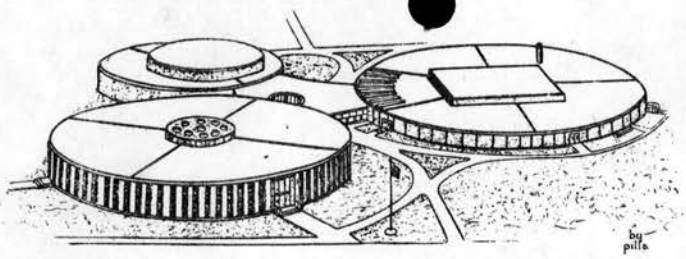
destroy". I would suggest that "the power to regulate is also the power to destroy". I formally request that this statement be read at any public hearing and that this needless regulation be withdrawn or modified substantially.

Sincerely yours,

Albert L. Kerr

Dr. Albert L. Kerr
Interim Headmaster

ALK/dh



White Bear Senior High School

5040 BALD EAGLE AVENUE

WHITE BEAR LAKE, MINNESOTA 55110

March 20, 1981

RECEIVED
MAR 23 1981
ADMINISTRATIVE HEARINGS

State Hearing Examiner
Room 300
1745 University Ave.
St. Paul, MN. 55104

RE: Proposal to increase license requirements for High School Head Varsity Coaches.

Gentlemen:

I am writing this in hopes that I might be considered as a small voice, crying in the wilderness. When I first heard about this proposal, I was not in favor of it, but I have had a complete reversal of thinking. The reason for the reversal is that I now believe that in order to attract qualified people into coaching, and encourage them to stay on for enough time to develop extra curricular programs into something truly worthwhile, requires that serious re-thinking about coaching be done.

Increasing the license requirements is a step in the right direction. It is true that the trend is for coaches to leave coaching because coaching is becoming a more difficult task; but if coaching can become more professionalized by having the responsibilities recognized more clearly then I am in favor of that. I believe that this proposal will make this possible.

For the record, I am presently a Physics teacher at White Bear Senior High, White Bear Lake, MN. I am also the head Varsity Coach of the Girls Gymnastics Team. I have been teaching and coaching since 1965.

Yours very truly,

Charles F. Prokop

Charles F. Prokop

PRESIDENT
Judy Johnson
Burnsville H.S.

PRESIDENT-ELECT
Pat Smith
Janesville H.S.

REPRESENTATIVE-MSHSL
BOARD OF DIRECTORS
Paula Bauck
Moorhead H.S.

MINNESOTA STATE HIGH SCHOOL
COACHES ASSOCIATION FOR GIRLS SPORTS, INC.

P.O. Box 20335, Bloomington, Mn. 55420

PAST PRESIDENT
Ardis Knudsen
Columbia Heights H.S.

EXECUTIVE SECRETARY
Vel Teichroew
Richfield H.S.

March 31, 1981

Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

The Minnesota State High School Coaches Association for Girls Sports, Inc., appreciates the work of the State Department of Education in formulating coaching licensure requirements. It has been a lengthy process in which many persons have taken an active role.

Theoretically, the Coaches Association supports the rules developed by the Education Department. We believe coaching is teaching, and coaches at all levels should have teaching expertise. The twelve credits and field experience in coaching areas will enable the person to gain additional expertise specific to coaching. Furthermore, the "grandparent clause" provides the majority of present head varsity coaches an opportunity to qualify immediately. The provisional license requirements clearly spell out the conditions for the problem of availability of head varsity coaches.

One question that does not seem to be formally addressed happens in the following situation: A person with a teaching license with coaching certification coaches, but does not teach. His or her teaching license expires and cannot be renewed because of lack of experience. May this person coach without a "valid" teaching license?

Realistically, the Coaches Association feels compelled to respond to the present shortage of qualified coaches, particularly women. The growth of girls sports in the past decade and the teacher cuts in many districts have contributed to the shortage of coaches. We feel it is very important to our young female athletes to have women as coaches and role models. Presently, the majority of women qualified to coach is young but unable to acquire permanent teaching positions. Many young people are discouraged from going into education because of the limited job opportunities, yet have a desire to coach. We are finding that many companies and businesses provide flexible hours so that a person could meet his or her coaching responsibilities.

As an alternate route to receiving coaching licensure, we would like to propose the following: a person may coach at the varsity level if he/she possesses a bachelor's degree from an accredited college, or university, plus a coaching minor. This coaching minor would include all the courses cited in 5 MCAR §1.0533 and the supervised coaching practicum. The coaching minor could include additional courses beyond these so that the school would be confident the

PRESIDENT
Judy Johnson
Burnsville H.S.

PRESIDENT-ELECT
Pat Smith
Janesville H.S.

REPRESENTATIVE-MSHSL
BOARD OF DIRECTORS
Paula Bauck
Moorhead H.S.

MINNESOTA STATE HIGH SCHOOL
COACHES ASSOCIATION FOR GIRLS SPORTS, INC.
P.O. Box 20335, Bloomington, Mn. 55420

PAST PRESIDENT
Ardis Knudsen
Columbia Heights H.S.

EXECUTIVE SECRETARY
Vel Teichroew
Richfield H.S.

coach is familiar with educational organization, procedures, and policies.

The Coaches Association for Girls Sports sincerely hopes you will consider our proposal as another avenue to gain coaching licensure. We feel it is a partial solution to a complex problem.

Sincerely yours,

Judy Johnson

Judy Johnson, President

13

College of Education

UNIVERSITY OF MINNESOTA
TWIN CITIES

Division of Physical Education
School of Physical Education, Recreation,
and School Health Education
Cooke Hall
1900 University Avenue S.E.
Minneapolis, Minnesota 55455

March 18, 1981

RECEIVED
MAR 20 1981
ADMINISTRATIVE
HEARINGS

Peter Erickson, Hearing Examiners
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

This is in reference to the proposed adoption of a rule of the State Board of Education Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR § 1.0533. In view of the fact that the proposal has not changed relative to the concerns expressed in a previous letter to Dr. George B. Droubie dated December 12, 1980, we wish to resubmit this letter (copy attached). Please consider this our written response to the proposed adoption of the above rule. Thank you.

Sincerely,

Jeralyn J. Plack, Coordinator
Professional Undergraduate Program

Mary L. Young, Head
Division of Physical Education

G. Alan Stull, Director
School of Physical Education, Recreation
and School Health Education

MLY:cry

College of Education

UNIVERSITY OF MINNESOTA
TWIN CITIES

Division of Physical Education
School of Physical Education, Recreation,
and School Health Education
Cooke Hall
1900 University Avenue S.E.
Minneapolis, Minnesota 55455

RECEIVED
MAR 20 1981
ADMINISTRATIVE
HEARINGS

December 12, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
Division of Special Services
Minnesota State Dept. of Education
Capitol Square
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

Thank you for your memo of November 12 concerning the revised draft of the proposed licensure rule. We would like to take this opportunity to express our grave concerns about several issues raised by the proposal. Specifically:

- "Every school district shall have a licensed head varsity coach for each interscholastic sport..." (underlining ours)

  This provides recognition for the need to employ qualified (licensed) coaches, but it does not require every "school" to employ qualified personnel. In large districts (those with two or more high schools) some of the athletes will be served by qualified personnel and some may not.

- "Nothing in this rule shall prohibit a school district from employing an unlicensed person...to coach a junior high school sport."

  This policy states clearly that the hiring of "qualified" coaches is based upon the age of the athlete. We would assert that the hiring of qualified coaches must be predicated upon meeting the needs, and protecting the safety and well-being of all athletes, and not merely the older ones. In fact, the literature will reveal that junior high school students are in a developmental phase which places them at a potentially higher risk of injury than the senior high school student.

- "All candidates for licensure...shall have satisfactorily completed a program...consisting of a maximum of 12 quarter or 9 semester hours designed to provide...knowledge, skills and understandings in all of the following areas."

  The introduction of a maximum must be a landmark in Minnesota licensure rules. We view it as not only deleterious, but dangerous, because it

sets a precedence for licensing mediocre, if not incompetent, coaches. Eight content areas are included in the five classes of knowledge, skill, and understanding which means that, on the average, the body of knowledge for any given subject must be mastered within an average of 1.5 quarter credit hours. The fact that this is highly unlikely can be documented by an inspection of the general credit allocations for any college or university. It will be seen that most theory courses in professional preparation of any kind range from 3 to 5 credits. Thus, the proposed policy will produce coaches with a minimal exposure to, and at best a superficial understanding of, the essential content.

The recommended content areas do not include the ethics of coaching. We view this as a serious omission. Within the context of practices in contemporary sport, one can hardly deny the need for such understandings.

- Section F includes a provision for "grandfathering in" individuals who are or have been coaches if they can verify the completion of 6 quarter hours (60 clock hours) of instruction in first aid and prevention and care of athletic injuries.

  Such a policy suggests that 5 of the other 6 content areas (anatomy, kinesiology, exercise physiology, theory and practice of sports techniques, psychology of sport and coaching) have been mastered by experience. While we acknowledge that learning does take place through experience, we would also submit that attention should be given to the recency of exposure to the body of knowledge.

Summarily, we would draw attention to the fact that participation in athletics places the student in an environment that is characterized by more potential risk than any other component of the curriculum. An unqualified or "underprepared" coach is concurrently placed in jeopardy. We hold that, as a protection to the athlete and the coach, the state of Minnesota is clearly obligated to enact licensure rules which dictate excellence of professional preparation. We, therefore, request consideration of the following:

- <u>All</u> head coaches must be licensed.

- No restrictions should be placed upon the maximum number of credits which comprise licensure. Rather, stipulations should be made about the minimum number of credits required.

- Ethics of Coaching should be included as a requisite content area for licensure.

- Some attention should be given to a "continuing education" component as a requirement to renew certification.

Thank you for considering our suggestion. We would be pleased to answer any questions you may have.

Sincerely,

Jeralyn J. Plack, Coordinator
Professional Undergraduate Program

Mary L. Young, Head
Division of Physical Education

G. Alan Stull, Director
School of Physical Education, Recreation and School Health Education

/kp

State of Minnesota
Board of Education

ADDENDUM

Statement of Need and Reasonableness for
Proposed Rule 5 MCAR § 1.0533

Concerning: The proposed adoption of a rule governing the licensure of head varsity coaches of interscholastic sports in senior high schools.

Following is a list of organizations and persons who will be testifying in support of the proposed licensure rule governing head varsity coaches of interscholastic sports in senior high schools.

Minnesota Education Association	Mr. Dan Moriarty
Minnesota Federation of Teachers	Mr. Al Olson
Minnesota State High School League	Ms. Dorothy McIntyre
Minnesota Parent, Teacher, Student Association	Dr. Van Mueller
Minnesota Board of Teaching	Mr. Kenneth Peatross
Minnesota Department of Education	Dr. Gregory Waddick Dr. George Droubie

Testimony regarding licensure of coaches of interscholastic sports will emphasize general support for the proposal and review aspects of the rule as follows:

--Applicability of the rule in senior high schools

--Definitions of head varsity coach, interscholastic sports, and senior high school

--Scope of the rule in terms of junior high school coaches and assistant coaches

--Qualifications required for coaching licensure

--Alternative route to coaching licensure

--"Grandpersoning" of teachers with coaching experience

--School district hardship situations.

SF-00006-01

OFFICE MEMORANDUM

DEPARTMENT Education

March 5, 1981

TO : Peter Erickson, Hearing Examiner
Office of Administrative Hearings

RECEIVED
MAR 1981
ADMINISTRATIVE HEARINGS

FROM : Lois E. Steinhaus L.E.S. 6-4428
Education Statistics Section

SUBJECT: EDU 81-002-PE Head Varsity Coaches of Interscholastic Sports

April 2, 1981 Hearing

RECEIVED
MAR 5 1981
ADMINISTRATIVE HEARINGS

Enclosed is a copy of the following material that you are to received 25 days before the hearing.

* (a) Proposed Rule
(b) Notice of Hearing
(c) Notice of Hearing and Proposed Rule as mailed
(d) Certificate of Board's Authorizing Resolution
(e) Affidavit of the Notice of the State Board of Education Rulemaking Mailing List
(f) Affidavit of Additional Notice of the State Board of Education Mailing List
(g) Affidavit of Mailing
(h) Certificate
(i) Notice of Intent to Solicit Outside Information and any material received as a result of such notice
* Order for Hearing
(j) Statement of Need and Reasonableness

(k) Copy of the State Register

Also enclosed is a parking permit.

I would appreciate your returning your report and the hearing record to me. Thank you.

39

DEPARTMENT OF ATHLETICS

FALLS HIGH SCHOOL
INTERNATIONAL FALLS, MINNESOTA 56649

RECEIVED
MAR 18 1981
ADMINISTRATIVE HEARINGS

Superintendent - James Roberts
1-218-283-8468
Principal - Donald Stadum
1-218-283-2571

ATHLETIC DIRECTOR
Wayne C. Haglund
1-218-283-8890

March 13, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

Your new proposal, with its four key parts for the licensing of coaches, is certainly the right direction to go.

But, in many cases involved under your plan, it will be the older coaches (exprience 5-10-15-20 years, etc.) that will be singled out and punished or discriminated against.

Therefore, we feel that any coach who can demonstrate that he/she has completed five athletic seasons of coaching experience prior to July 1, 1982, and is a licensed teacher, should be grandfathered a license as a coach of interscholastic sports.

Reasons:

1. Many of the above class of coaches attended universities and colleges seeking careers in teaching and coaching when the qualifications to coach were a major in physical education. In many cases, not even that. So, they planned their programs accordingly and have qualified for all these years in their present jobs.

2. The above class of coaches, while providing leadership to the youth in all communities of our State, have gained valuable knowledge through many years of practical experiences in actual cases of first aid, prevention and care of injuries, theory and practice of sport techniques, psychology of coaching and many, many years of field experience that no program you design can replace.

3. With the continued drop in enrollments and the tightening of money, causing reduction in the teaching staffs, which involved many young coaches; one must depend on the older coaches for help if the athletic programs for our youth are

DEPARTMENT OF ATHLETICS

FALLS HIGH SCHOOL
INTERNATIONAL FALLS, MINNESOTA 56649

Superintendent - James Roberts
1-218-283-8468
Principal - Donald Stadum
1-218-283-2571

ATHLETIC DIRECTOR
Wayne C. Haglund
1-218-283-8890

to continue. Many of the older coaches have left the coaching field, but are still in active teaching. To ask them to fill in vacancies in coaching and to make them go back for licensing is very unlikely.

4. In most cases during the past several years, due to proper counseling by the colleges and universities, the younger coaches are licensed. The younger people chosing teaching and coaching as their profession will also receive proper counseling so they will be licensed in these fields upon graduation. Due to this counseling, it would now become the responsibility of each school to make sure they replace the grandfathered coaches, that may choose to drop out of this field or retire, with certified personnel. In a period of a few years, all coaches would be licensed according to your present plan.

Sincerely,

James F. Roberts
Superintendent

Wayne C. Haglund
Athletic Director

WCH/dj

38

HOLDINGFORD PUBLIC SCHOOLS

INDEPENDENT DISTRICT 738

Holdingford, Minnesota 56340

RECEIVED
MAR 18 1981
ADMINISTRATIVE
HEARINGS

ROGER DOUCET
Superintendent
746-2221

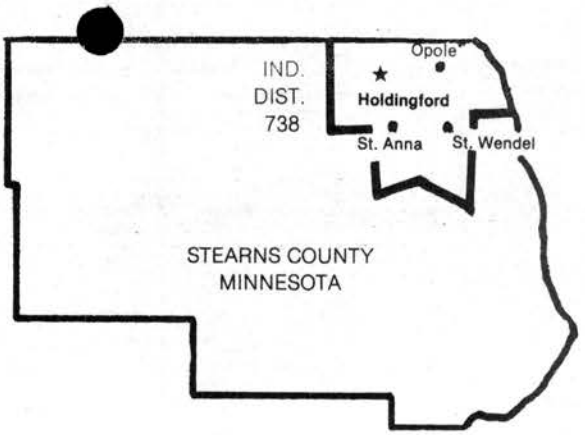
DALE BRUNS
Special Programs Director
746-2221

DR. CRAIG PAUL
Secondary Principal
746-2221

WALTER WILSON
Elementary Principal
746-2232

GARY ROEBUCK
Dean and
Activities Director
746-2221

JOE DONNELLY
Counselor
746-2221



March 16, 1981

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Mn. 55104

Dear Mr. Erickson:

RE: PROPOSED RULES OF THE STATE BOARD OF EDUCATION 5 MCAR 1.0533
Head Varsity Coaches of Interscholastic Sports in Senior High Schools

While I am in complete agreement with the intent of the proposed rules, there is a very real and practical issue I am compelled to call to your attention.

Albeit that licensed teachers/coaches would, in all probability, provide a generally safer learning situation for student-athletes, in reality, licensed teachers as coaches can be very difficult to secure for some sports. Indeed, District 738 has been challenged and will be challenged again to secure licensed teacher/coaches for swimming and gymnastics, even to the point of hiring less desirable teachers for the sake of the competitive athletic experience and coaching expertise they could bring to the job.

It is our opinion that the mere fact of licensure as a teacher, or even as a coach, but without competitive experience (as a gymnast in particular) in the sport, would not appear to offer as safe a learning situation as would a mature, experienced athlete in that sport.

Therefore, we urge the hearing examiner and the State Board of Education, to consider deleting Section H, Subdivision 2 of the proposed rules. We would prefer that in hardship cases, local school districts be given greater flexibility and discretion in providing the safest and best learning experience possible for our student-athletes, even if it means that the coach is not licensed as a teacher.

Sincerely,

Roger Doucet
Superintendent

RD/pk

35

PE

BOARD OF EDUCATION

Dr. R. M. Christianson, Chairman
Kathleen B. Engel, Clerk
Marvin B. Maser, Treasurer
Rodney D. Foss, Director
R. Scott McAllen, Director
Herbert E. Sikkink, Director

HINCKLEY PUBLIC SCHOOLS

Independent School District No. 573

HINCKLEY, MINNESOTA 55037

O. W. PAT OSTRAND
Superintendent

H. PETER VOS
High School Principal

EUGENE R. JOHNSON
Elementary School
Principal

RECEIVED
APR 2 1981
ADMINISTRATIVE
HEARINGS

April 1, 1981

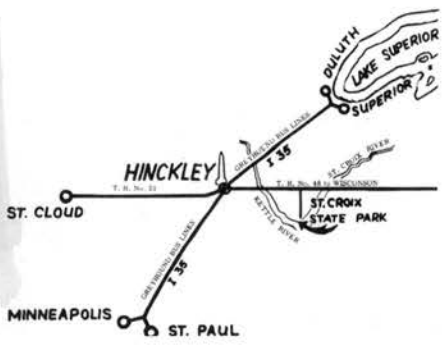
Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

I offer this in strong opposition to the proposed rule 5 MCAR 1.0533. This rule is simply not needed, is not desired, and will create undue hardships on a vast majority of school districts in the State of Minnesota.

Most school districts are experiencing declining enrollment, increasing number of activities, and decreasing number of teachers. More school districts are encouraging college graduates to have certification in at least 2 academic areas, and are finding it difficult to obtain new teachers or teachers on staff who have the coaching certification. Even when a person has a teaching and coaching certificate, it does not mean that the person is "qualified". With the teacher situation as it is, rules and regulations governing licensure should provide school districts with more flexibility in obtaining coaching personnel rather than developing more stringent requirements. There are many individuals in each community who are well qualified to assist or coach various athletic programs, but because they don't have a teacher's certificate we will not be able to use their expertise. If that is permitted to happen, it would be an injustice to our young people. Local school boards and administrators do not need these proposed rules. It has been my experience that we try to employ the best qualified people we can to accomplish the task at hand. Particularly in this period when Boards and administrators are conscious of liability, we would use a great deal of caution to employ only those coaches who we thought were the best qualified. To do otherwise is to invite a great deal of public reaction and law suits.

We have people in the community who are more qualified to coach golf, tennis, swimming, and a number of other sports than teachers on staff. We should be permitted to use these people.



I strongly support a requirement which would require all coaching personnel to have or obtain in a short period of time, training in first aid, care, and treatment of injuries. I am of the opinion that no other requirement should be made of school districts in employing the personnel which it thinks is best qualified to coach the sports it sponsors. I encourage you to reject all other proposed rules, because they simply are not in the best interests of the students, schools, or community.

Sincerely,

O. W. Pat Ostrand

O. W. Pat Ostrand
Superintendent

OWO:rk

RUSSELL ROBINSON
High School Principal

JERRY JOHNSON
Elementary Principal

JANET MOHR
Ass't. H.S. Principal

DENNIS ANDERSON
Activities Director

39

JAMES S. LAMONT
Superintendent

Frazee-Vergas Public Schools

Independent School District No. 23
Frazee, Minnesota 56544

FRED HARKER
Chairman

FRED WACKER
Clerk

CLARENCE ZIEGLER
Treasurer

ANDERS FETT
Business Manager

RECEIVED
MAR 12 1981
ADMINISTRATIVE HEARINGS

March 10, 1981

Mr. George Beck
Room 300
1745 University Avenue
St. Paul, Mn. 55104

Sir:

Please be advised the Frazee/Vergas Board of Education, District 23, at their regular meeting does oppose imposition of any rule or regulation as pertains to coaching staff.

The level of expertise, we feel is best left to the judgment of the local jurisdiction. The imposition of arbitrary standards in our estimation shall have no good or reasonable effect on the level of participation or competition in the participating schools other than to increase costs by reducing the supply of coaches.

If you wish to further stultify the athletic programs in Minnesota, apply the rule. We are opposed.

For the Board of Education,

James Lamont

James Lamont, Superintendent

cc: Bd. of Education

AN EQUAL OPPORTUNITY EMPLOYER

52

KRAHMER LAW OFFICES
204 LAKE AVENUE
FAIRMONT, MINNESOTA 56031
(507) 235-6631

BRUCE A. KRAHMER, ATTY.
FRED C. KRAHMER, ATTY.

FRED P. KRAHMER (1909-1964)

TRUMAN OFFICE:
TRUMAN, MN 56088
(507) 776-2311

RECEIVED
MAR 23 1981
ADMINISTRATIVE
HEARINGS

March 19, 1981

Mr. George Beck
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Beck:

A recent article in the Fairmont, Minnesota, Sentinel by Dr. James E. Mitchell, our Superintendent, raised a recent proposed rule that would require coaches to complete 12 quarter hours in certain types of courses, in addition to holding a teaching certificate.

My children have been actively involved in the AAU Swimming Program here in Fairmont, and in Minnesota, and because of the budgetary problems of the school, there is no swim team nor any coaching. The coaching was done by myself, other interested persons, and also by part-time teachers and others that we could hire.

The Program has, basically, now died because of the lack of ability to find people to coach, not really particularly because of a lack of interest on the part of the participants.

While I realize that swimming is, perhaps, not a prime sport here in southern Minnesota, my concern is that this rule will necessarily mean the demise of a number of other sports here in Fairmont.

We are not a metropolitan or suburban community, and we are having a great deal of difficulty with the budgetary problems. Primarily, this comes about, as I am sure you are aware, as a result of the formula for redistributing the taxes.

In Fairmont, there are a number of feeder programs that are run through the school and I imagine that the coaches do not meet the proposed qualifications, although in my opinion are in every way qualified to do their particular thing, so to speak, because of the active interest they have and because of prior participation.

One of the problems that one always has is that a blanket rule comes down for a particular reason, and then a lot of people suffer that should never have been involved in the first place. I am sure there have been problems with lack of experienced coaches, or other problems that may have developed as a result of lack of education

about health, etc. Nevertheless, it does seem to me that there should be another way to solve this problem, rather than a blanket rule which will adversely affect, I am sure, Fairmont, and a lot of other communities, which are sportswise in a more dire situation than we.

Very truly yours,

Fred C. Kramer

FCK:el

31

INDEPENDENT SCHOOL DISTRICT NO. 454

DR. JAMES E. MITCHELL
Superintendent

Central School Building
115 South Park Street
Fairmont, Minnesota 56031
Telephone (507) 238-4234

HARLOW C. HANSON
Business Manager

March 25, 1981

RECEIVED
MAR 27 1981
ADMINISTRATIVE HEARINGS

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

I would like to testify at the hearing on Thursday, April 2, 1981 on the issue, "Proposed Rule Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools."

I am superintendent of Schools at Fairmont, and the Board, Administration, and Staff in this district are against the proposed rule change.

I would appreciate it if I could make an appearance at the hearing.

Warm regards,

James E Mitchell

Dr. James E. Mitchell
Superintendent of Schools

JEM:dz

30

Emmons Public School

Superintendent
Dick Guevremont

(507) 297-5442

Debbie Peterson, Secretary



Emmons, Minnesota 56029

Dave Olson, Secondary Dean
Tom Sheehan, Elementary Dean

(507) 297-5441

RECEIVED
MAR 16 1981
ADMINISTRATIVE HEARINGS

March 12, 1981

Mr. Peter Erickson
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson,

I would like to express my view on the proposed licensure requirements.

Our school district is very small and it is extremely difficult to find certified coaches at the present time. With a staff of about twenty, it means that some coaches are working three sports. This results in burned-out coaches in a few years.

If the present proposal passes, I am afraid we may be forced to hire teachers with coaching certificate, which in turn may not be the best classroom teachers. The second possibility would be dropping a sport because we do not have a certified coach.

I realize people could coach and then go on to become certified, but in this day's economy that is not always an easy thing to do.

I appreciate the opportunity to express my feelings.

Sincerely,

Tom Sheehan

Tom Sheehan
Athletic Director

29

P. J. Morgan, D.D.S., P.A.
Elmore, Minnesota 56027

Office Phone: 943-3357

RECEIVED
APR 1 1981
ADMINISTRATIVE HEARINGS

March 30, 1981

George Beck, Hearing Examiner
Room 300, 1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr Beck:

I would urge against the enactment of the proposed new rule requiring future varsity coaches to hold a license to coach, but rather remove all artificial restrictions on coaching for these reasons.

Society has come to understand we need less, not more central government regulation. Local governing units know their needs best and have the ability to tailor resources to fit their own needs in a manner impossible for State government units.

With reduced enrollments and fewer faculty at a time when need for coaching has doubled because of girls athletics, it is unrealistic to expect to restrict coaching and maintain quality programs. This is especially significant when you consider that most faculty and particularly an aging faculty as we have it today. They have either little ability or little interest in coaching. Desire for added money or coaching just to assure a teaching position is not conducive to running a good athletic program.

In this time of money crunch in education, costly counter productive regulations are inadvisable if we are to maintain our quality of programs.

We have very capable and interested people in the community who can give years of continuity to programs. This is vital to <u>good</u> programs. These people have proven their worth in most communities, including ours.

Rather than the negative approach of licensure and restriction, I would propose taking a positive approach of best utilizing all available resources. The State Board of Education could encourage and coordinate an effort to present the courses you recommend for coaches in each MSHL District to send community coaches to central locations to help them upgrade their skills. I am convinced these people who are coaching because they want to, would be more enthusiastic and effective than those who do it because they have to.

Sincerely,
Patrick J. Morgan, D.D.S.
School Board Director
District 219

SAINT OLAF COLLEGE • NORTHFIELD, MINNESOTA 55057



March 16, 1981

The Office of the Commissioner of Education
Board of Education
State of Minnesota
Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Gentlemen:

I wish to react to the recent memo sent out from the Board of Education regarding the Statement of Need and Reasonableness for Proposed Rule 5, MCAR 1.0533.

In the portion labeled section A you make the statement, "programs of interscholastic sports are an integral part of the total school program and should be so designated as to be of educational value." I can understand a statement like this. Something similar to this has been handed down through the years and, in my opinion, has been made in order to justify interscholastic sport. You furthermore say "the board believes that it is essential that the coaches of interscholastic sports meet the licensure requirements stated in this rule and hold a Minnesota teaching license." Be as it may regarding the validity of both of these statements let us go on to other sections of the report, which, in my mind, are contradictory to the basic statement made in section A.

In section C you state that assistant coaches at junior high schools will not need to be licensed. Yet if you say that interscholastic sports is an integral part of the program, is it sufficient reason because of shortage that you set aside the licensure procedure for assistant coaches and junior high coaches? Would you do the same for chemistry teachers or for mathematics teachers? Would you put in the classroom teachers who are not licensed because of a shortage? If you would not, why then assistant coaches and junior high coaches? Are they any less important? Are you saying that there are parts of the interscholastic program that is not an integral part of the educational system?

I can see your concern about first aid and care and prevention of athletic injuries. Certainly, the report about football injuries last fall would be alarming to you I am sure. Yet you state that "minimal training on an in-service basis for assistant coaches and junior high coaches, will be sufficient". I refer you to research conducted by E. J. Kelley and Carl Linsey at Pennsylvania State University and published in the Research Quarterly,

Vol. 51, #4, December 1980. They conclude that graduating seniors in physical education and practicing physical educators are unaware of current information related to muscles and ligaments of the body, understanding of relationships of body motion and the development of endurance, lacking in information on the scientific basis of conditioning, and showing evidence of knowledge obsolescence in areas related to diet, water, salt and heat exhaustion. If, indeed, majors in physical education and practicing physical educators, many of whom are coaches, show evidence of knowledge obsolescence in the area of athletic training and conditioning, how can you expect that coaches of any level to have firm grounding in the areas mentioned above through inservice training? I have attended many inservice sessions in my professional career and I can vouch for the fact that, although many were helpful, none of these sessions would serve in place of a solid formal educational program whose specific objective would be directed to the understanding of the care and prevention of athletic injuries.

In your last paragraph on page 2 you point out that colleges and universities programs of 30 to 40 quarter hours of credit for the preparation of coaches is unnecessary. Yet you point out that interscholastic sports is an integral part of the program of the educational system. Again, why do you exempt coaching preparation of the extent advocated by colleges and universities? You would not expect, I don't believe, that a teacher show any less than the extensive preparation now required to teach mathematics, English, or any other subject matter in the school curriculum. Then why would you require less for the coaching of interscholastic sports, an area where there is certainly a need for training in the understanding of growth and development of children, and the psychological aspects related to coach-player relationship, where there is expertise needed in small group theory, where there is expertise needed in the management of an enterprise such as a football team or a basketball team, where there is expertise needed in selecting methods of teaching motor skills that will be the most effective. Would you not agree that these items I have mentioned constitute substance requiring more than 12 quarter credits for mastery?

In the top of the paragraph on page 3 you state that the preparation of physical education teachers will have completed a coaching preparation endorsement because it is a part of their program. May I suggest you look at the licensing program as stated in the Teacher Licensing Handbook. No where does the program indicate courses in athletic coaching. To imply that physical education and athletic coaching are the same is to misinterpret physical education. It is exactly this kind of reasoning that confuses the role of physical education in the schools. I am surprised that the Board of Education contributes to this confusion. In my mind it should clarify it, not muddy it.

In Section E you state that a school district may have the option to prepare their own coaches on an inservice basis in conjunction with their college or university. This is not exactly clear but what seems to be implied is, that if a prospective coach would serve in some capacity such as an apprentice, and if some college or university would verify the work done in a mode which is sufficient to be an athletic coach, then that person could be licensed. Would you do the same for anyone who aspires to teach chemistry or mathematics or English or social studies or any other subject in the school curriculum?

Finally, I would question the statement that your proposed coaching licensure rule is reasonable. I can see the need for licensure but to place it under the guise that it is an integral part of the educational system, you are trying to have the best of two worlds in the answer to the coaching licensure problem. The way to have a minimal licensure rule for the coaching of interscholastic sports is simply to say that interscholastic sports is an adjunct to the school program and that it is <u>not</u> an integral part of the program. Thus, in that sense you need not be concerned with following the same policy for licensure as holds for teachers in general.

Sincerely,

Axel Bundgaard

Axel Bundgaard
Professor of Physical Education

AB:ep

R. J. FOLSTROM
Superintendent

JACK GUNDERSON
Secondary Principal

KEITH DEXTER
Asst. Secondary Principal

ROBERT PASSERI
RICHARD SAVOLAINEN
Elementary Principals

Ind. School District No. 317

Deer River, MN 56636
P.O. Box 307
Telephone 218-246-8241



RECEIVED
MAR 27 1981
ADMINISTRATIVE HEARINGS

March 25, 1981

George Beck, Hearing Examiner
Room 300
1745 University Ave.
St. Paul, MN 55104

Dear Mr. Beck:

Independent School District #317, Deer River, wishes to voice their objections to the proposed licensure changes for coaches of inter-scholastic sports in senior high school.

If the proposed rules are adopted, there is no way that we will be able to offer the extra curricular opportunities for our students that we presently have in our extra curricular program.

The programs that will be dropped are girls and boys cross country, boys and girls cross country skiing, and boys and girls golf. Although we consider these to be minor sports, they do involve forty to fifty students, many who will participate in no other activity.

We have a faculty of approximately eighty teachers and on that staff we have only ten coaches who will meet the licensing requirements. Three of the ten will not coach and three are about to retire.

We would hope that some exception of some kind could be made for the minor sports.

Sincerely,

R. J. Folstrom

Raymond J. Folstrom
Superintendent

cc: Howard Casmey
MSBA
State Board of Education

INDEPENDENT SCHOOL DISTRICT 492 • AUSTIN PUBLIC SCHOOLS • (507) 437-6631
ADMINISTRATION BUILDING • 202 FOURTH AVENUE NORTHEAST • AUSTIN, MINNESOTA 55912

RECEIVED
MAR 6 1981
ADMINISTRATIVE HEARINGS

DR. BERNARD W. KAYE
DIRECTOR OF PERSONNEL

MEMORANDUM TO: Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55401

FROM: Bernard W. Kaye, Ed.D. BWK.

DATE: March 3, 1981

RE: Proposed adoption of a rule of the State Board of Education governing licensure requirements for head varsity coaches of interscholastic sports in senior high schools 5 MCAR 1.0533

This memo is submitted to state concerns relative to the proposed adoption of a new rule governing the licensure of head varsity coaches of interscholastic sports in senior high schools.

My first concern has to do with subdivision A-Applicability. The language reads that every senior high school shall have a licensed head varsity coach for each interscholastic sport. In my judgement, there are at least two interscholastic sports which should be exempted from this provision. Those sports are tennis and golf. These sports are "non-contact" sports. It would seem to me that the five requirements which are listed in section D are too comprehensive for the sports of golf and tennis. It is difficult to justify the need for any preparation for these two sports beyond first aid and the prevention and care of athletic injuries. It is urged that consideration be given to excluding tennis and golf from the proposed regulations governing head varsity coaches of interscholastic sports in senior high schools.

My second concern has to do with subdivision E- Alternative route to licensure. This provision notes that a school district may contract with Minnesota colleges and universities which offer approved programs leading to licensure of head varsity coaches to develop jointly the program of instruction which has been outlined. We would urge that there be flexibility for certain kinds of programs or course work needed, particularly in the area of first aid and prevention and cure of athletic injuries. It would seem that this kind of a program could be developed jointly with a local community college which for us here in Austin would be much more convenient and practical as opposed to traveling to one of the universities. We would urge that this kind of flexibility be permitted.

BWK/mb

cc: Arthur Hass - Athletic Director
Vernon Nordaune - High School Principal
Richard M. Morrison, Ed.D. - Superintendent

HOLDINGFORD PUBLIC SCHOOLS

INDEPENDENT DISTRICT 738

Holdingford, Minnesota 56340

ROGER DOUCET
Superintendent
746-2221

DALE BRUNS
Special Programs Director
746-2221

DR. CRAIG PAUL
Secondary Principal
746-2221

WALTER WILSON
Elementary Principal
746-2232

GARY ROEBUCK
Dean and
Activities Director
746-2221

JOE DONNELLY
Counselor
746-2221



MAR 1981
COMMISSIONER OF EDUCATION

RECEIVED
MAR 25 1981
ADMINISTRATIVE HEARINGS

March 16, 1981

Commissioner H. Casmey
Capitol Square Building - Room 712
St. Paul, Mn. 55101

Dear Mr. Casmey:

RE: PROPOSED RULES OF THE STATE BOARD OF EDUCATION 5 MCAR 1.0533
Head Varsity Coaches of Interscholastic Sports in Senior High Schools

While I am in complete agreement with the intent of the proposed rules, there is a very real and practical issue I am compelled to call to your attention.

Albeit that licensed teachers/coaches would, in all probability, provide a generally safer learning situation for student-athletes, in reality, licensed teachers as coaches can be very difficult to secure for some sports. Indeed, District 738 has been challenged and will be challenged again to secure licensed teacher/coaches for swimming and gymnastics, even to the point of hiring less desirable teachers for the sake of the competitive athletic experience and coaching expertise they could bring to the job.

It is our opinion that the mere fact of licensure as a teacher, or even as a coach, but without competitive experience (as a gymnast in particular) in the sport, would not appear to offer as safe a learning situation as would a mature, experienced athlete in that sport.

Therefore, we urge the hearing examiner and the State Board of Education, to consider deleting Section H, Subdivision 2 of the proposed rules. We would prefer that in hardship cases, local school districts be given greater flexibility and discretion in providing the safest and best learning experience possible for our student-athletes, even if it means that the coach is not licensed as a teacher.

Sincerely,

Roger Doucet

Roger Doucet
Superintendent

RD/pk

NORTH ST. PAUL - MAPLEWOOD - OAKDALE SCHOOLS
INDEPENDENT SCHOOL DISTRICT NO. 622
37
2055 E. Larpenteur Ave.
Maplewood, MN 55109

March 16, 1981

RECEIVED
MAR 26 1981
ADMINISTRATIVE HEARINGS

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson,

School District #622 is submitting the following concerns relative to the Proposed Rule Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High School:

A. Because of declining enrollment and reduced teaching staffs, it will be very difficult to meet the requirements of licensed teachers and licensed head varsity coaches.

B. Acceptable

C. Acceptable

D. Current non-licensed head varsity coaches may be reluctant to earn the additional credits. There is also the question of who will pay the additional expenses for these credits.

E. With the financial problems that school districts have at the present time, there is the problem of who will pay for these approved programs.

F. Acceptable

G. Acceptable

H. Acceptable with the recommendation that if a school could not obtain a licensed teacher and/or a licensed head coach, the school be allowed to hire an unlicensed teacher and/or an unlicensed head coach who is not currently enrolled in a program leading to licensure.

Sincerely,

Richard St. Germain

Richard St. Germain,
Assistant Superintendent, Secondary Education

RStG/bl
CC: Commissioner Casmey, MSBA

Minnesota Association of School Administrators

RECEIVED
FEB 27 1981
ADMINISTRATIVE HEARINGS

480 Cedar Street
Hanover Building-Suite 350
Saint Paul, Minnesota 55101
Telephone (612) 224-1828

PRESIDENT
Lew Finch

PRESIDENT ELECT
Pius Lacher

PAST PRESIDENT
Ralph M. Brynelson

TREASURER
Robert L. Miller

EXECUTIVE SECRETARY
Norman B. Maguire

ASSISTANT EXECUTIVE SECRETARY
Rick Van Hemert

Affiliated with

American Association of School Administrators

School Administrators of Minnesota

Minnesota Administrators of Special Education

Allied with

Minnesota Association of Educational Office Personnel

February 26, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson,

The Minnesota Association of School Administrators appreciates the opportunity to comment on the draft proposal of the coaching licensure rule. As superintendents, we appreciate the many changes that have been made in the proposed rule from that which was proposed by the Board of Teaching a number of years ago. In general, the Board of Directors of MASA could support the working draft dated November 1980 which appears to be the document to be heard, with one exception.

Ideally, all head varsity coaches would be licensed teachers since an athletic program is seen as an important part of the total educational opportunities which are available to pupils enrolled at the secondary level. We would also want these head coaches to have the knowledges and skills which are defined in Section D, not only for the sake of the students which they will be supervising but also for other coaches who will be serving under the direction of the head coach in the program. We also appreciate the grand personning provisions that are contained in Section F and the implied opportunities for local districts to join together to provide the necessary instruction in first aid and prevention and care of athletic injuries for those persons who have not had usch courses and who wish to be licensed under the grand personning clause.

We sould however, strongly request and recommend that Section H relating to school district hardship situations be revised so that provisional licensure may be obtained by persons who are not certified teachers. If this is not done, students throughout the state will be losing out on athletic opportunities because, while persons who have a knowledge and skill of the sport may be available, such persons are not licensed teachers. With a declining pupil enrollment school districts are simply not able to employ new staff and in numerous instances persons who once coached and who remain with the district

in the teaching ranks do not wish to remain with a coaching activity throughout their professional career. Not only is it undersirable to have persons not interested in coaching forced into accepting such assignments but in many cases negotiated master agreements make such forced assignments impossible. If, therefore, those involved in licensure are truly interested in the welfare of students, the hardship provision should be revised to indicate that a provisional license for one school year and renewable for a maximum of one additional school year may be issued to a person to serve as a head varsity coach of an interscholastic sport provided that the following conditions have been met:

1. Evidence that the school district is unable to employ a licensed head varsity coach of interscholastic sports for the current school year, and

2. The person to be employed under such authorization has experience in the sport and can demonstrate the fundamental knowledges and skills necessary for coaching the sport, and

3. The person can provide verification of experience in working with high school or college students in some form of organized group activity.

The MASA Board of Directors believes that if the suggested revision is made the licensure rule pertaining to coaching will recognize the importance of the head varsity coach to the total educational program while still providing sufficient flexibility to offer a maximum opportunity to students during the time of declining teacher availability for coaching assignments.

We urgently request your consideration of the suggested change.

Sincerely,

Norm Maguire
Executive Director

NM:tb

cc: George Droubie

NORTH ST. PAUL - MAPLEWOOD - OAKDALE SCHOOLS
INDEPENDENT SCHOOL DISTRICT NO. 622
2055 E. Larpenteur Ave.
Maplewood, MN 55109

43

RECEIVED
MAR 17 1981
ADMINISTRATIVE HEARINGS

March 16, 1981

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson,

School District #622 is submitting the following concerns relative to the Proposed Rule Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High School:

A. Because of declining enrollment and reduced teaching staffs, it will be very difficult to meet the requirements of licensed teachers and licensed head varsity coaches.

B. Acceptable

C. Acceptable

D. Current non-licensed head varsity coaches may be reluctant to earn the additional credits. There is also the question of who will pay the additional expenses for these credits.

E. With the financial problems that school districts have at the present time, there is the problem of who will pay for these approved programs.

F. Acceptable

G. Acceptable

H. Acceptable with the recommendation that if a school could not obtain a licensed teacher and/or a licensed head coach, the school be allowed to hire an unlicensed teacher and/or an unlicensed head coach who is not currently enrolled in a program leading to licensure.

Sincerely,

Richard St. Germain

Richard St. Germain,
Assistant Superintendent, Secondary Education

RStG/bl
CC: Commissioner Casmey
MABA

48

INDEPENDENT SCHOOL DISTRICT NO. 77

R. J. REHWALDT, Superintendent

PHONE: (507) 387-3461
51 PARK LANE
MANKATO, MINNESOTA 56001

RECEIVED
MAR 19 1981
ADMINISTRATIVE HEARINGS

March 18, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
Saint Paul, Minnesota 55104

Dear Mr. Erickson:

At a regular meeting of the School Board of District 77, action was taken directing me to convey the following thoughts to you in regard to MCAR 1.0533, Head Varsity Coaches of Interscholastic Sports in Senior High Schools. In general, we believe this particular document is superior to some of the earlier ones proposed. The area where we have concern is under "H, School District Hardship Situations."

It would always be our first choice to have a teacher who is a coach involved in our athletic program. However, with declining enrollment, it may not always be possible to find a teacher who has any coaching skills; yet there are people who have coaching skills who are not teachers. An example might be at nearby Gustavus Adolphus College. Mr. Steve Wilkinson coaches the tennis team at Gustavus Adolphus. He has a national reputation as a coach, runs a very successful tennis camp, and has developed many national champions. Yet, if he were not certified as a teacher in Minnesota schools, he could not coach a tennis team at any high school level.

We believe a provision needs to be inserted under "H" which allows a school district to employ an individual other than a teacher if in some way the coaching skills can be demonstrated or verified.

Sincerely,

R. J. Rehwaldt
Superintendent

RJR:bb

34

RECEIVED
FEB 26 1981
ADMINISTRATIVE
HEARINGS

Hibbing Public Schools

E. W. Eggers, Superintendent

Hibbing, Minnesota 55746

John W. Slattery, Adm. Asst. to Supt.

Phone 218 - 263-4850

February 25, 1981

Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

On April 2, 1981, you will be conducting a hearing re the governing licensure requirement for head varsity coaches of interscholastic sports.

I am in general agreement with the proposed rule with one exception. Item H. School District Hardship Situations. The typical school district is witnessing a decline in enrollment. The decline has worked its way through the 8th and 9th grade, with the senior high yet to experience the significant drops in enrollment. This means that as the decline progresses through grades 10--12, we will be cutting staff, primarily on a seniority basis. These are the grades too, where staff is heavily involved in extra-curricular activities. As the staff is cut, we are bound to lose many of our coaches.

If a sport is to continue, we will have to look outside of our faculty for these replacements. I'm convinced that it is far wiser for us to seek a person well skilled in an activity to coach than to hire a teacher without the skillls and knowledge to coach simply because that person has a teaching license and the former does not.

We would ask that section H be changed to delete references to "teacher" and insert "person" and to eliminate item 2 under section H.

Very truly yours,

E. W. Eggers
Superintendent of Schools

EWE:ba

Columbia Heights Public Schools
INDEPENDENT SCHOOL DISTRICT NO. 13
DR. ALAN OSTERNDORF, Superintendent
1400 49TH AVENUE N. E.
COLUMBIA HEIGHTS, MINN. 55421
An Equal Opportunity Employer 612-571-9601

RECEIVED
MAR 23 1981
ADMINISTRATIVE HEARINGS

M E M O

DATE: March 18, 1981

TO: State Board of Education Hearing
Peter Erickson, Hearing Examiner

FROM: School Board and Administration of Independent School District #13
Columbia Heights
Rosemary Byrnes, Board Chairperson
Alan D. Osterndorf, Ph.D., Superintendent
Donald Carlson, Athletic Director

RE: Hearing of April 2, 1981, Concerning Adoption of Rules Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools

In December of 1976 and May of 1978, Independent School District #13 submitted to the Board of Teaching and is now submitting testimony to the State Board of Education relating to coaching licensure. This District appreciates the many changes that have been made in this set of rules over those which have previously been proposed. In general, the District supports these rules with one exception.

Ideally, all head varsity coaches would be licensed teachers since an athletic program is seen as an important part of the total educational opportunities which are available to pupils enrolled at the senior high school level. It is also desirable that these head coaches have the knowledges and skills which are defined in Section D, not only for the sake of the students which they will be supervising but also for other coaches who will be serving under the direction of the head coach in the program. Also appreciated are the grand personning provisions that are contained in Section F and the implied opportunities for local districts to join together to provide the necessary instruction in first aid and prevention and care of athletic injuries for those persons who have not had such courses and who wish to be licensed under the grand personning clause.

We would, however, strongly request and recommend that Section H relating to school district hardship situations be revised so that provisional licensure may be obtained by persons who are not certified teachers. If this is not done, students in this district and throughout the state will be losing out on athletic opportunities because, while persons who have a knowledge and skill of the sport may be available, such persons are not

licensed teachers. With a declining pupil enrollment school districts are simply not able to employ new staff and in numerous instances persons who once coached and who remain with the district in the teaching ranks do not wish to remain with a coaching activity throughout their professional career. Not only is it undesirable to have persons not interested in coaching forced into accepting such assignments but in many cases negotiated master agreements make such forced assignments impossible. Should a district not have a person on staff it is possible of course to look for a licensed teacher who may not be actually teaching but who would like to coach. This person, too, is often impossible to find. If, therefore, those involved in licensure are truly interested in the welfare of students, the hardship provision should be revised to indicate that a provisional license for one school year and renewable for a maximum of one additional school year may be issued to a person to serve as a head varsity coach of an interscholastic sport provided that the following conditions have been met:

1. Evidence that the school district is unable to employ a licensed head varsity coach of interscholastic sports for the current school year, and

2. Evidence that a qualified licensed teacher is not available for the position, and

3. The person to be employed under such authorization has experience in the sport and can demonstrate the fundamental knowledges and skills necessary for coaching the sport, and

4. The person can provide verification of experience in working with high school or college students in some form of organized group athletic activity.

Without such a provision this school district, for instance, would not have been able to offer a varsity girls' gymnastics program this past year since our coach was a gymnast who was not a licensed teacher but who was an education major in physical education at the University of Minnesota. With the rate of decline Independent School District #13 is experiencing such a situation can only become more common. If that is true in the metropolitan area, the problem can only be compounded in smaller outstate districts.

This School District believes that if the revision suggested above is made the licensure rule pertaining to coaching, the rules will still recognize the importance having qualified head varsity coaches in the total educational program and still provide sufficient flexibility to offer a maximum athletic opportunity to students during the time of declining teacher availability for coaching assignments.

We urgently request your consideration of the suggested change.

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RECEIVED
APR 13 1981
ADMINISTRATIVE HEARINGS

Borup Independent School District No. 522

Borup, Minnesota 56519

Dr. Gerald R. Bass, Superintendent
Thomas M. Witherow, High School Principal
Gregory M. Bruce, Elementary School Principal

April 4, 1981

Mr. George Beck, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Beck:

Please add the enclosed material to the testimony taken at the April 2, 1981, hearing regarding 5 MCAR s. 1.0533 (Head varsity coach licensure). This material is reaching you late because it was originally prepared for presentation at the hearing. Because of scheduling conflicts, I was unable to attend the hearing, so I have rewritten my comments for presentation in this manner.

Thank you for your consideration of my testimony. I would be happy to answer any questions you may have or to expand upon any points which I have made.

Sincerely,

Gerald R. Bass

Board of Education

Joseph E. Miller, Chairman
Cecil Sprenger, Clerk
Gary Workman, Treasurer
Robert Smith, Director
Shawn Crompton, Director
John Arends, Director

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APR 13 1987
ADMINISTRATIVE HEARINGS

TESTIMONY CONCERNING PROPOSED RULE 5MCAR 1.0533
Head Varsity Coaches of Interscholastic Sports
in Senior High Schools

As a matter of introduction, I am Dr. Gerald Bass, Superintendent of Schools in Borup, Minnesota. Borup is one of the smallest school districts in our state and faces problems which I believe to be somewhat typical of small schools.

The Board of Education, generally, is doing a service to the schools and the student-athletes of our state. The proposed rule attempts to ensure that the student-athletes are led and coached by persons who are knowlegeable in coaching style and tactics, in the rules and techniques of the sport, and in the prevention and care of athletic injuries. This is a laudable goal since it provides trained coaches who, through training and conditioning, will help athletes reach high potential with minimal risk of injury. I certainly support these efforts.

However, there is one concern I have about the proposed rule: What happens to a school's sports program if none of the teachers are willing to coach? Under the proposed rules: (1) to run a given athletic program at the varsity level, you must have a licensed coach; (2) to become a licensed coach, you must first be a licensed teacher; and (3) in emergency situations, a school district may be allowed to employ a coach on a provisional license, but these licenses are available only to teachers. What does a school district do if: (1) there is no licensed coach on the staff; (2) none of the licensed teachers are willing to coach with a provisional license; and (3) a number of students wish to participate in a given athletic program?

This might seem to be a hypothetical case, maybe even unrealistic, but it is a situation facing my school district right now. It is a very real problem for me. Our school district employs 18 licensed staff, including teachers, principals, and superintendent. Of the 18 licensed "teachers," 5 are part-time employees, 8 live more than 20 miles from the school, and 1 is licensed to coach. Because of travel time and costs, inability for coaches to participate in car pools, disinterest in athletics, age, or a

variety of other reasons, I have no teachers willing to coach during the winter sports season. This past year our girls and boys basketball teams were coached by a licensed coach who has since left our staff (we have been unable to hire a replacement who is also a licensed coach). He was assisted in those two programs by a local farmer, the high school principal, one of the custodians, and myself. There were no teachers coaching basketball this past season and none is willing to assume such responsibility for next year. Therefore, I am faced with three choices for next year: (1) force a teacher to be a head coach and apply for provisional licensure (legally unsound, poor situation for the athletes); (2) drop one or more varsity sports programs; or (3) use non-teachers to coach even though they are not eligible for licensure (serious problems regarding eligibility of teams for interscholastic competition, violation of MSHSL rules, and liability should injuries occur).

What can I do? Well, I can propose that Section H of 5 MCAR 1.0533 be amended to strike the word teacher and insert person in line 3; and strike subsection 2 altogether. This would allow a school district such as ours to continue to operate a varsity sports program with an interested and willing coach, one who is pursuing a program as outlined in section D.

There are a number of safeguards built into the rule to prevent abuse of the rule even with the proposed changes. First, the non-teacher could only obtain a provisional license. Second, the non-teacher must be pursuing a coaching preparation program, including care and prevention of injuries. Third, the provisional licensure could not be granted unless the district were unable to employ a regularly licensed coach (teacher). The change would only apply to an emergency situation, as noted above, where a district is faced with the options of dropping a program or disregarding MSHSL and Board of Education rules regarding licensed/certified coaches.

Please think of the student/athletes in districts such as ours. Should we deny them the opportunity of athletic participation solely because teachers are unwilling to assume the responsibilities of coaching? I think not. Thank you.

15

Albany Area Schools

District No. 745 - Albany, Minnesota 56307
Administration Office Telephone (612) 845-2171

RECEIVED
MAR 31 1981
ADMINISTRATIVE HEARINGS

Avon Elem. (612) 356-7942
Farming Elem. (612) 548-4955
Albany Elem. & Jr. High (612) 845-2161
Albany Senior High (612) 845-2171

12 March 1981

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 Univeristy Avenue
St. Paul, MN 55104

RE: Proposed Rule Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools

FROM: Albany Area Schools Board of Education
Chuck Griffith, Senior High School Principal
Peter Herges, Athletic Director

Chuck Griffith
Peter M Herges

Dear Mr. Erickson,

We wish to go on record stating our concerns with the proposed rule (stated above and outline as 5 MCAR 1.0533).

We agree with the intent that our head coaches should have the best possible preparation to coach a senior high school interscholastic sport. However, we see and anticipate serious practical problems with the implementation of a rule such as proposed in 5 MCAR 1.0533.

We were unable to obtain a head coach for cross-country this last fall who met the standards indicated (i.e., licensed teacher). The person who we were able to secure had a college degree, but had no licensure as a teacher. He would not even qualify to be a head coach if he met the 60 clock hours of instruction in first aid and prevention and care of athletic injuries specified in paragraph #F. We had no one else available and had to request a variance from George Droubie in teacher licensure; the variance was granted after much time was spent over the matter. Additionally, although our girls' softball coach meets the requirements of being a teacher, he does not meet the current standards for head coach; while paragraph #F might allow him to complete the necessary six quarter or 60 clock hours, he might choose not to complete this requirement and then we are again left without a properly certified/licensed head coach.

In short, the rule as proposed will not make the circumstances better in terms of obtaining head coaches; in fact, it will make it more difficult and may cause us or force us to drop a sport for lack of a properly certified coach. That in turn may, ipso facto, place us in violation of the statute on discrimination because we would have to drop a sport and thus lack "equality".

(over)

We could, and would, initiate & maintain a first aid course to provide the necessary 60 hours or equivalent of 6 quarter credits in first aid and prevention and care of athletics injuries, but even if we did, we anticipate problems obtaining licensed teachers as certified coaches not only this year, but in succeeding years. In fact, the problem will become more acute.

We see, potentially, major problems securing head coaches for our boys and girls athletic programs if 5 MCAR 1.0533 is implemented as written. Specifically, paragraphs H-1, H-2, and H-3, will limit our ability to maintain programs for both boys and girls. We may, eventually, be forced to cancel a program for lack of a head coach in a sport. As stated, this may directly contribute to violation of the discrimination statute and rules. That would be truly unfortunate.

ARTHUR E. MARBEN
HIGH SCHOOL PRINCIPAL
TELEPHONE: 507 – 629-4223

JAMES B. CREAGER
ASSISTANT PRINCIPAL
TELEPHONE: 507 – 629-4224

VERNON E. GRINDE
ELEMENTARY PRINCIPAL
TELEPHONE: 507 – 629-4220

THE TRACY PUBLIC SCHOOLS

INDEPENDENT SCHOOL DISTRICT NO. 417
TRACY, MINN. 56175
JAMES R. WALKER, SUPERINTENDENT
TELEPHONE: 507-629-4222

RECEIVED
MAR 16 1981
ADMINISTRATIVE HEARINGS

March 13, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Re: Licensure Requirements for Head Varsity Coaches

Dear Sir:

Although the upgrading of staff in the fields of coaching licensure requirements is a noteworthy project, it is the feeling of the Tracy School Board to have questionable value at this time.

In small school districts with senior staffs and declining enrollments, I question the programmatic value of this rule. Coaches for our activities are becoming harder to find. In order to maintain some of our programs, we are actually asking some of our coaches to carry a double load.

We especially question the provision that a person grandparented in must be a licensed teacher. We don't understand how a teaching license will aid in the make up of 60 hours of instruction in first-aid and the prevention of athletic injuries.

This rule in our opinion will be a hardship on our school district to comply with in the future and very well may force some schools to reduce or eliminate some programmatic activities for youngsters.

Sincerely,

James R. Walker

James R. Walker
Superintendent

JRW/pms

cc: Dick Anderson
MSBA

4

Gustavus Adolphus College

St. Peter, Minnesota 56082 • Telephone (507) 931-8000

RECEIVED
APR 7 1981
ADMINISTRATIVE HEARINGS

April 6, 1981

Hearing Examiner
Office of Administrative Hearings
Room 300 1745 University Avenue
St. Paul, MN 55104

In reference to Proposed Rule 5 MCAR 1.0533

Dear Sir,

After attending the April 2nd, 1981 hearing and sharing the substance of said hearing with our professional staff, I wish at this time to register a strong negative opinion regarding the "rule" in question.

The proposed rule does not offer a workable solution to the very real problem of providing head varsity coaches. In fact it renders the "coaching certification" program rationale much less defensible. In plain words it is extremely difficult to identify and employ "para-professional" head coaches who own both a teaching degree and a coaching certification.

We would tend to support the proposal suggested by the "Minnesota Coaching Association for Women" whereby the requirements would be a coaching license and a college degree.

It would also seem threatening for the State Department of Education to establish "maximum" course requirements. Those of us engaged in the preparation of coaches have developed very sound rationale for the knowledge, skill, and competencies included in our coaching certification components.

In summary we feel the proposed rule would:

1. necessitate dropping a certain sport
2. deny opportunity to those valuable and committed citizens who have coaching license but no teaching certification
3. establish a dangerous bureaucratic precedent in controlling academic programs.

Sincerely,

J. M. Malmquist

J. M. Malmquist
Department Chairman

RECEIVED
MAR 31 1981
ADMINISTRATIVE
HEARINGS

MANKATO STATE UNIVERSITY

DEPARTMENT OF PHYSICAL EDUCATION/(507)389-6313 MANKATO, MINNESOTA 56001

March 30, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

This letter is being written in response to the proposed rule Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools. My point of view is most likely definitely biased by being actively involved in sports medicine over the last twenty years through my position as a certified athletic trainer.

There definitely should be rules regulating candidates academic qualifications for varsity coaches of interscholastic sports in the senior high schools of the State of Minnesota. It is commendable that through the long tedious process of formulating the requirements the committee members recognized the need for a basic background in first aid and in the prevention and management of athletic injuries. Injuries from athletic participation do and are occurring, in fact they occur in epidemic proportions.

Factually, at the high school level, coaches are hired to teach and coach. Unfortunately, the area most ignored by our school administrators is in the realm of preparation for the recognition, immediate care, and the follow-up day-by-day management of athletic injuries. No matter how well meaning, most coaches are in coaching because that is their primary interest. In the heat of practice or competition, if any one area is going to be neglected, it's usually the sports medicine aspect. Placing a person, who has had one basic course in first aid and one basic course in athletic training, in charge of the time consuming task of handling all athletic injuries can be likened to taking a first quarter student in business and letting them go run the bank.

Declining enrollments, budgetary cuts, staff reductions are leading to the making of many agonizing decisions regarding programs within our

school districts. But if they are still going to continue to sponsor interscholastic athletic activities, athletic injuries are still going to occur. The standards for athletic injury care at the high school level in the State of Minnesota are extremely minimal and cannot in anyway be reduced. The liability must be realized. Improvements must be made. The health and welfare of the athletic participant must be of top priority--not just having a team for the sake of saying your school sponsors a well-rounded program. The teacher-athletic trainer at the high school level is a necessity also.

Respectfully,

Gordon L. Graham

Gordon L. Graham, President
Minnesota Athletic Trainers Association
Athletic Trainer
Mankato State University

GLG/jb

2

RECEIVED
MAR 30 1981
ADMINISTRATIVE HEARINGS

Bemidji State University BEMIDJI, MINNESOTA 56601

DEPARTMENT OF
PHYSICAL EDUCATION AND RECREATION
218-755-2940

March 26, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

RE: Proposed Adoption of a Rule of the State Board of Education Governing Licensure Requirements for Head Varsity Coaches of Inter Scholastic Sports in Senior High Schools 5 MCAR 1.0533

In part D of the proposal, the statement indicates a maximum of 12 quarter or 9 semester hours.

The maximum term would make it impossible to provide candidates with the knowledges, skills and understandings indicated in part D.

The following are the quarter hours involved in the competentcies areas list at our university.

1.	First Aid	3	
2.	Athletic Training	3	
3.	Anatomy	4	
4.	Kinesiology	4	
5.	Physiology	5	
6.	Theory of Sports	3	(minimum)
7.	Psychology of Sports	3	
	TOTAL	25	

Suggest the proposal read minimum of 15 hours.

Sincerely,

Charles Edgington

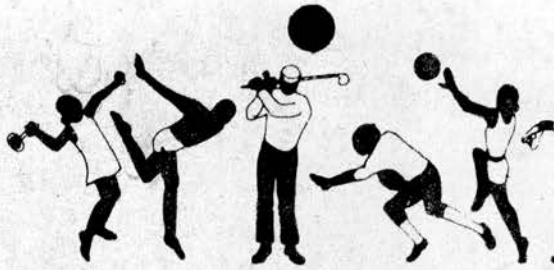
Charles Edgington, Chairperson
Physical Education and Recreation

gj

3

PE

CONCORDIA COLLEGE ST. PAUL



ATHLETICS

RECEIVED
FEB 24 1981
ADMINISTRATIVE HEARINGS

HAMLINE AND MARSHALL · ST. PAUL, MN. 55104

2-11-81

Dr. Goerge B. Droubie, Manager
Personnel Licensing and Placement
610 Capital Square Building
550 Cedar St.
St. Paul, MN 55101

Dear Dr. Droubie,

The members of our Physical Education Department have studied the proposed program for licensure of head athletic coaches in Senior High Schools, 5MCAC 1.0533. We unanimously agree that the five specific areas of competency cannot be adequately covered within the twelve quarter hours or nine semester hours academic program.

The only person under present law that is able to be a head coach in Minnesota is a certified teacher with a coaching licensure. It is our experience that students in other areas other than education, have indicated their desire to complete the requirements for a coaching licensure. The number of additional credits needed to obtain a teaching certificate is why many elect not to go into coaching.

We feel that a better solution to the problem would be to eliminate the teaching certificate requirement for a head coach. This would allow colleges to continue to have effective programs for training coaches.

Sincerely,

Robert E. Barnes
Director of PE and Athletics
Concordia College
St. Paul, MN 55104

cc: Dr. Gregory J. Waddick
Hearing Examiner

5

HAMLINE UNIVERSITY
DEPARTMENT OF HEALTH AND PHYSICAL EDUCATION
ST. PAUL, MINNESOTA 55104

RECEIVED
MAR 23 1981
ADMINISTRATIVE HEARINGS

March 20, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Ave.
St. Paul, Minn. 55104

Dear Mr. Erickson,

I am writing on behalf of Hamline University to express our strong opposition to the proposed licensure of varsity coaches. The provision for a maximum of 12 quarter or 9 semester hours is absolutely ludicrous. Such a diluted program is not only worthless for the prospective coach, but may in fact be impossible to offer at the private colleges.

I suggest that the word maximum be changed to minimum or that the licensure for coaches be eliminated completely.

Sincerely,

Kent Stahly

Kent Stahly
Chairman, Health and
Physical Education

KS:dmm

Minnesota Association of Colleges for Teacher Education

RECEIVED
APR 6 1981
ADMINISTRATIVE HEARINGS

OFFICERS

Helen Berwald
President
Carleton College
Northfield, MN. 55057
507-663-4008

W. Donald Spring
President Elect
Division of Humanities
University of Minnesota- Morris
Morris, MN. 56267
612-589-4501

Linc Ekman
Secretary-Treasurer
Macalester College
St. Paul, MN. 55105
612-647-6302

EXECUTIVE COMMITTEE

Duane Orr
College of Education
Mankato State University
Mankato, MN 56001
507-389-1215

Alvin Ollenburger
College of Education
University of Minnesota- Duluth
Duluth, MN. 55812
218-726-7134

Richard Jones
College of Education
Moorhead State University
Moorhead, MN. 56560
218-236-2181

April 3, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Ave.
St. Paul, MN 55104

Dear Mr. Erickson:

We have received notice of the public hearing to be held on April 2, 1981, to receive testimony relating to 5 MCAR - 1.0533, a licensure rule which deals with head varsity coaches of interscholastic sports in senior high schools. We wish the written record to show that our association has taken a position in opposition to the rule on the grounds that it has far-reaching implications which could have deleterious effects upon the overall quality of public education in this state.

Our decision to oppose the rule was not made without due deliberation and extensive discussion during our meetings these past several years. We feel we are well aware of the problems and divergent points of view which have made it one of the most embattled of all rules proposed, first by the Board of Teaching and now by the Board of Education. Nevertheless, we insist that the strategy adopted to resolve the conflict endangers the autonomy and academic freedom of colleges and universities and also, ultimately, the public's freedom of choice in employing educators of various levels of quality and preparation.

The purpose of this particular memorandum is not to speak to the relative merits of various positions on this specific issue, inasmuch as individual institutions are sending representatives to present testimony of that kind. It is to express to you the serious concern of those deans and faculty representatives who constitute our membership regarding an unusual provision in the rule which establishes a maximum requirement rather than the usual minimum. (I refer, of course, to Section D which establishes a maximum of 12 quarter or 9 semester hours. As that language has been interpreted to us, any program submitted which requires more than the specified number of hours would be denied approval.) If this strategy suceeds in forcing unwilling institutions to offer the abbreviated programs the state desires, and only those kinds of programs, what is to prevent the State from invoking this provision as a precedent which could be applied to all programs?

As suggested earlier, previous rules have dealt with minimums, a practice we believe lies within the spirit and intent of the approved program approach in that it gives the State the opportunity to fulfill its obligation to provide quality education for its citizens, while at the same time respecting institutional autonomy and allowing for a certain amount of diversity among programs.

The introduction of the strategy of establishing maximums, on the other hand, distorts the essence of the approved program approach in that it reduces institutional autonomy to an unwarranted and undesirable extent, it eliminates diversity among programs, and in fact, requires institutions to move away from the very quality the State is obligated to protect and encourage. If institutions lose their freedom to design programs in accordance with their values and qualitative standards, then schools and parents will also lose their freedom to choose the kind of educator they desire to teach their children.

The support of diverse programs, reflecting diverse values and responsive to diverse needs, has been characteristic of the educational tradition of this State. We think it is a tradition well worth continuing in view of the fact that there is no hard evidence to suggest there is one best approach, or that any one group has greater wisdom in these matters than all others.

We respectfully request that this rule be returned to the Board of Education for further study.

Sincerely,

Helen Berwald

Helen Berwald
President

HB/ng

RECEIVED
APR 13 1981
ADMINISTRATIVE HEARINGS

moorhead state university
moorhead, minnesota 56560

April 10, 1981

Mr. Peter Erickson, Hearing Examiner
1745 University Avenue, Room 300
St. Paul, MN 55104

RE: 5MAR 1.0533

Dear Mr. Erickson:

In response to the request for comments about the proposed rule for athletic coaches, I believe that the development of any rule which specifies both the content to be studied and the maximum number of credits to be earned is inappropriate, arbitrary, and not in the best interests of the state. Moorhead State now has a program in coaching which includes 13 credits for physical education majors, and 31 credits for non-physical education majors.

To modify our program so that it conforms to this rule would be academically dishonest. For example, the topics listed in D.1 to 5 are now included in our curriculum as follows:

(D.1)	Hlth 220	Care & Prev. of Ath. Inj.	(2)
(D.2)	PE 220	Human Anatomy	(4)
	PE 320	Kinesiology	(4)
	PE 431	Physiology of Exercise	(3)
(D.3)	PE 370-379	(Coaching courses) 2 credits per sport	(2)
(D.4)	PE 460	Principles of Coaching	(4)
(D.5)	40 hrs. of practicum		(4)
		Total	23

I have included only the courses listed for the topics listed in the rule; we have others included in our present requirement because, in our judgement, coaches also need to know about administration of athletic programs, the principles of physical education in general, and officiating. Further, most students wish to study more than one sport, and only one coaching course is listed above.

Therefore, if we were to teach the subjects listed within a 12-credit maximum, we would not be accurately describing the curriculum to our students, or we would be forced to "water-down" our curriculum.

In conclusion, we at Moorhead State University support the intention to license coaches for, at the least, varsity sports. We would like to see the coaches of younger children licensed also. We strongly urge you to reject the concept of combining content minima and credit maxima in rule, however.

Thank you for the opportunity to respond.

Sincerely,

Richard V. Jones
Dean of Education and Regional Services

an equal opportunity employer

THE COLLEGE OF SAINT CATHERINE. SAINT PAUL, MINNESOTA 55105

Department of Physical Education

(612) 690-6705

RECEIVED
APR 9 1981
ADMINISTRATIVE HEARINGS

April 3, 1981

The College of St. Catherine Physical Education and Athletic Department wishes to make a statement to the State Board of Education concerning its Coaching Licensure Requirements currently being proposed for adoption.

We at the College of St. Catherine have been proud of the fact that Minnesota is one of a select few states which requires certification for coaches as well as teachers. However, to minimize the requirements at the college level would only be a step backward in the certification process.

We require 24 credit hours or an equivalent of six courses. The board proposes to cut that requirement in half; which would only eliminate valuable course information. You have identified five areas in which candidates for licensure should be provided with knowledge, skills, and understanding.

1. First Aid prevention and care of athletic injuries.
2. Science of Sport (Anatomy, Kiniseology and exercise physiology)).
3. Theory and Practicum of sports today.
4. Psychology of sports and coaching.
5. Supervised field experience in coaching consisting of 40 clock hours.

To provide a quality program of supplying understandings in all of the above areas. The College of St. Catherine Physical Education and Athletic Department feels that your proposal falls short by 12 credit hours or an additional 3 courses. According to an article in March 1981 Journal of Physical Education and Recreation written by Matthew G. Maetozo "70 percent of the nations high school coaches have physical education degrees, but of the 675 degree granting institutions, all are not accredited or sufficiently instructed in coaching preparation. Parents, if not school authorities, will demand increasingly specific competencies for those responsible for health and safety of youth".

Providing all the information necessary to run a safe and successful athletic program for new coaches in just three courses is impossible and inadviseable.

Respectfully submitted April 3rd, 1981.

Bonnie O'Hare

Bonnie C. O'Hare
Associate Professor of Physical Education

L. J. Larson

L. J. Larson
Chairman - Department of Physical Education

APR 1981
PERSONNEL LICENSING

ST. CLOUD STATE UNIVERSITY
COLLEGE OF EDUCATION
Department of Health, Physical Education & Recreation
St. Cloud, Minnesota 56301
(612) 255-2155

RECEIVED
MAR 4 1981
ADMINISTRATIVE HEARINGS

February 26, 1981

Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

I wish to express the position of interested people in the HPER Department at SCSU toward the proposed rule (5MCAR 1.0533) of the State Board of Education for governing licensure requirements for head varsity coaches of interscholastic sports in senior high schools. From the outset, you should know that we support the Board of Education's effort in attempting to resolve this important matter but would like to see some minor changes considered by the Board before a final decision is made.

First, adequate coverage of the required subject area in 12 quarter hours will not be easy to achieve. Some people are concerned that existing courses would have to be changed; we're more concerned whether the proposed content can be sufficiently treated in that length of time. Would it be possible to require a 12-credit minimum and allow each college or university to decide the number of credits that should be required for the coaching certificate? Or we might suggest a range of 12-24 credits, reflecting a minimum and a maximum. We feel that the four-year institutions could provide a higher quality experience for the prospective coach with the more flexible format we have suggested.

Second, we support the implied position of the Board that public school coaching and athletics are educational functions and should be governed accordingly. However, the current job market situation for coaches in Minnesota causes us to lean toward an alternative to the requirement that a head coach must possess a teaching certificate. Please consider the merit of permitting someone with a college degree and a coaching certificate from one of the colleges to serve as a head coach. Whatever the preparation, it seems imperative that the individual have at least minimum preparation in the subject areas that relate to working with students in senior high schools.

SCSU is an equal opportunity / affirmative action employer and is in compliance with all state and federal laws prohibiting discrimination

Thank you in advance for your consideration of our suggestions as you and the Board deliberate on the specifics of this important rule and issue.

Respectfully,

D. Ray Collins
Chairperson

DRC/drg

/0

SAINT OLAF COLLEGE • NORTHFIELD, MINNESOTA 55057



RECEIVED
FEB 26 19..
ADMINISTRATIVE
HEARINGS

February 25, 1981

Mr. Peter Erickson
Hearing Examiner
Room 300
1747 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

Mr. Carl Knutson of the State Department of Education has recently informed us of the public hearing regarding coaching licensure for head varsity coaches of inter-scholastic sports in senior high school.

As a Department of Physical Education, we are taking this means of conveying to you our strong opposition to the proposed rule as stated in 5 MCAR 1.0533.

While we support the five specific areas of competency identified in D "Qualifications for licensure", it would not appear to be feasible to realize these competencies in the 12 quarter hour or 9 semester hour MAXIMUM limitation.

After considerable discussion by our Physical Education Staff, we feel it would take a minimum of 3 courses to even expose the listed competencies in item "D". The St. Olaf College curriculum is on a course basis. One course converts to 3.65 semester hours. This would equate to 10.95 semester hours. Exceeding the 9 semester hour maximum.

While we appreciate the concern for placing a limit on required preparation for interscholastic coaching, we view the proposed maximum of 12 and 9 hours as too restrictive to achieve any meaningful treatment of the competencies.

Our curricular offerings in such areas as kinesiology, exercise physiology, psychology of sport, theory of coaching, etc. have been designed with regard to current fields of knowledge and to serve students focusing on related fields of sport and exercise in addition to that of secondary education. It would be difficult for us to redesign curricular offerings in order to "squeeze" them into the maximum proposed.

We would support a more reasonable licensing program that would suggest a range of credit limitations, i.e. a range of 9-15 semester hours.

We respectfully submit these reactions for your consideration.

Professionally yours,

Tom Porter

Tom Porter, Chairman
Department of Physical Education

TP:ep

southwest state university • marshall, minnesota 56258

RECEIVED
APR 6 1981
ADMINISTRATIVE HEARINGS

April 2, 1981

Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

We request your consideration of the following comments in the matter of adoption of a rule of the State Board of Education governing licensure requirements for head varsity coaches of interscholastic sports in senior high schools - 5 MCAR 1.0533.

1. (C. Scope)

We believe that children developing initial skill techniques and attitudes have the greatest need for a competent, compassionate coach. We believe that these children deserve coaches who have knowledge of how to teach the basics of sports. We therefore believe it is desireable to license coaches of junior high school competetive sports. To not do so seems analogous to licensing secondary but not elementary teachers, a practice that would surely be rejected. The proposed rule calls for head coaches to have knowledge of first aid and prevention and care of athletic injuries. The risk of injury to younger competetive, contact sport participants is not sufficiently less than that of their older counterparts to justify lack of licensure for coaches of younger children.

It seems to us that licensure should cover coaches of all contact sports at all levels. If that is not possible, and we recognize the significant forces against it, then we would support tighter licensure restrictions on coaches of children at the formative level that those for coaches at the varsity level. Less desirable, because of concern for the safety and welfare of children, is to license no one. However, that alternative seems almost as attractive as the proposed rule.

2. (D. Qualifications for licensure)

The maximum of 12 quarter credit hours forces a choice between two unsatisfactory alternatives by colleges and universities proposing programs and should therefore be removed. Either the content will remain similar to what it has been historically (in our case, 24 - 30 hours) while the student receives only 12 credit hours or the content will be substantially reduced. In either case, the prospective coach will suffer.

Telephone 507/537-7021
Southwest State University is an Affirmative Action / Equal Opportunity Institution

The former situation is patently unfair while the latter forces at best a cursory examination particularly in the category entitled the science of sports. The latter makes it very difficult for a prospective coach to obtain the fundamentals for proper understanding prevention and care of athletic injuries.

Thank you for your thoughtful consideration of these matters.

Sincerely,

Richard Curry
Licensure Officer

Bruce Wilcox, Chairman
Education Department

James Denevan, Chairman
Health and Physical Education

And the following members of the Health and Physical Education Department.

Gary Buer

R. A. Colvin

Carmen DeKoster

Harry Jones

Jeri Madden

Jean Replinger

Michael Sterner

b98

12

state university system
office of the chancellor

PHONE 612 / 296-2844

407 CAPITOL SQUARE BUILDING / 550 CEDAR STREET, ST. PAUL, MINNESOTA 55101

RECEIVED
APR 10 1981
ADMINISTRATIVE HEARINGS

April 10, 1981

Mr. Peter Erickson, Hearing Examiner
1745 University Avenue, Room 300
St. Paul, MN 55104

Dear Mr. Erickson:

I am writing in regard to the proposed adoption of a State Board of Education rule (5 MCAR 1.0533) governing licensure requirements for head varsity coaches of interscholastic sports. The State University System, which prepares approximately fifty percent of all new teachers trained annually in Minnesota, is concerned with the effect of this proposal on the process of developing undergraduate curricula at its six teacher-preparing institutions (Bemidji, Mankato, Moorhead, St. Cloud, Southwest, and Winona State Universities).

At the outset, let me make it clear that the universities are quite comfortable with the proposed educational content listed in D.1-5. We believe these principles to be reasonable in assuring that coaches are qualified to protect the health and safety of participants in varsity sports. As was apparent from the testimony at the hearing, however, the faculty at many of the teacher-preparing institutions question the adequacy of the program that can be taught within the proposed credit limit maximum.

The State University System has no problem with the Department of Education's promulgation of rules that set minimum standards for entry into the coaching profession. It is concerned, however, when the Department takes upon itself the responsibility for curriculum in the teacher-preparing institutions. The faculty at these institutions, most trained at the doctoral level in the subject matter in question, is concerned that it cannot convey necessary materials to assure the health and safety of participants within the parameters of the proposed rule.

The primary issue, however, is not the number of credits selected as a maximum. The issue is the precedent-setting attempt to legislate a maximum. The State University System believes that it is within the responsibility of the Department of Education to propose minimum standards,

and within the responsibility of the teacher-preparing institutions to respond with appropriate curricula. The proposed rule, which can be construed to infringe on the institutional autonomy to determine curriculum, sets a precedent that the State University System believes to be inappropriate.

The staff of the State University System Board and administrators and faculty of the six state universities involved in teacher preparation would be happy to work with the Department of Education to reach an appropriate resolution of this issue.

Sincerely yours,

Sheila Kaplan

Sheila Kaplan
Vice Chancellor for Academic Affairs

SK:tm

UNIVERSITY OF MINNESOTA
TWIN CITIES

Office of the Dean

College of Education
104 Burton Hall
178 Pillsbury Drive S.E.
Minneapolis, Minnesota 55455

RECEIVED
APR 13 1981
ADMINISTRATIVE
HEARINGS

14

April 9, 1981

Mr. Peter Erickson, Hearing Examiner
1745 University Avenue
Room 300
St. Paul, Minnesota 55104

Dear Mr. Erickson:

I am writing with several comments on the proposal of the State Board of Education for a new rule (5MCAR 1.0533) to govern the licensure of head varsity coaches of interscholastic sports. It is my understanding that you will receive written testimony until April 13, and this letter is submitted as an institutional statement from the College of Education, University of Minnesota, Minneapolis.

We are in basic agreement with the content of the coaching proposal as outlined in D1-5. Our basic concerns involve the imposition of maximum number of credits for the work outlined in the proposal. It does not seem possible to us that the program described in the proposal could be taught within the boundary of the credit limitation noted. Of far more importance, however, is our concern over the basic principle involved. Clearly, the State Board of Education plays an important and proper role when it legislates standards in the several licensure areas reserved to it. But, the State Board exceeds that role, and I think, its authority, when it mandates to institutions the amount of credit which may be granted for the desired program. Such a restriction is both arbitrary and inappropriate and its need has not been demonstrated by the arguments presented by the State Board.

We urge the adoption of the rule with the the deletion of the provision for a credit maximum.

Sincerely,

William E. Gardner

William E. Gardner
Dean

WEG:dd

Breck

4200 West River Parkway
Minneapolis, Minnesota 55406
(612) 721-7501

18

February 19, 1981

RECEIVED
FEB 23 1981
ADMINISTRATIVE HEARINGS

Mr. Peter Erickson
Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

I am writing on behalf of Breck School in response to your hearing notice announced for April 2, 1981 concerning the "requirements for head varsity coaches of interscholastic sports and senior high schools #5MCAR1.0533".

Although I cannot attend that meeting, I will send representatives of Breck School. But I do want you to be aware of our position at this time.

Four years ago, Breck School, along with a number of other independent schools in Minnesota, sought legal help to present our case to the Minnesota State High School League that it was inappropriate for the League to set up restrictions and limitations on the people that independent schools could call upon to coach varsity sports. Breck School, for example, is accredited by the Independent School Association of the Central States, and we meet the requirements of ISACS for the running of our program, both academic and extra-curricular.

The Minnesota State High School League decided not to move to require an across-the-board set of certification standards for varsity coaches in independent schools.

I am particularly concerned about the fact that this proposed regulation attempts to control the certification process of independent school teachers through their coaching responsibilities. You state in your recent communication: "Applicibility. Every senior high school shall have a licensed head varsity coach for each interscholastic sport except as otherwise provided in "C" below. Each person who is employed and functions as a head varsity coach of an interscholastic sport in a senior high school shall hold a valid Minnesota teaching license and shall satisfactorily complete a preparation program approved by the Minnesota Board of Education leading to the licensure of Head Varsity Coaches of Interscholastic Sports."

We totally oppose any attempt by the State as a vehicle to register, license or control teachers of Breck School. As a member of ISACS, our teachers have requirements that they must meet in terms of their ability to teach, their proven experience, and the knowledge that they have of the subject matter they teach and the age-level child they teach. Frankly, I view this as simply another effort to place State controls and licensure over independent school teachers, which previously the State has not done.

Although 80% of the staff at Breck School hold Minnesota teaching certificates, Breck does not require that a teaching certificate be held in order for a teacher to receive an appointment to the staff. We recruit our teachers on a nation-wide basis and, in fact, anywhere from ten to forty percent of each new teacher group recruited each year will come from outside the State of Minnesota. We simply cannot provide the kind of quality, nationally-based excellent education that we currently provide if every teacher who comes to this School and also serves as a head varsity coach, must also have a set of requirements meeting Minnesota laws for both licensure and coaching requirements.

Again, I wish to express our disapproval of this concept in the strongest terms. If this is a direction that the State Board is establishing for the public sector, that is between the State Board and the public sector. However, we do not believe that the State Board should or has the right to pass such legislation as it would affect the operation of independent schools in the State of Minnesota.

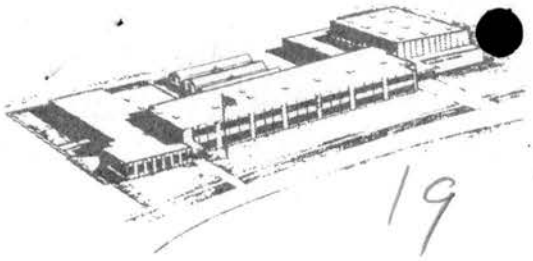
Sincerely,

John C. Littleford

John C. Littleford
Headmaster

JCL/jm

cc: Representative Carl Johnson
Senator Jerry Hughes
Governor Albert H. Quie
Kenneth Greener
LeRoy Brown
Timothy Hitchcock
Lee Anderson
Michael Malone
Lauress V. Ackman



19

Caledonia Public Schools
INDEPENDENT SCHOOL DISTRICT NO. 299
CALEDONIA, MINNESOTA 55921
PHONE 507-724-3316

RECEIVED
MAR 10 1981
ADMINISTRATIVE HEARINGS

March 6, 1981

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson:

In the Matter of Proposed Adoption
of a Rule of The State Board of
Education Governing Licensure
Requirements for Head Varsity
Coaches of Interscholastic Sports
in Senior High Schools 5 MCAR 1.0533

Although these proposed rules requiring the licensure of all head varsity coaches are the most acceptable set of rules and regulations to be presented to date, they will still be troublesome for many school districts across the State of Minnesota for the following reasons:

1. Many coaches who are currently certified coaches or have held the position for many years are deciding to give up their coaching duties but remain in their teaching position.

2. Low staff turnover causes few staff vacancies to occur which would provide school districts with opportunity to hire new properly certified coaching personnel.

3. Teachers currently on staff who are not now teaching do not hold coaching certificates nor do they have a desire to seek certification.

4. Minor varsity sports such as golf, tennis, softball, cross country, etc. should not have the same certification requirements as do the major sports such as football, basketball, wrestling, volleyball, gymnastics, track, hockey, baseball, and other similar sports.

I fear that the adoption of these rules as proposed would force the curtailment of many athletic opportunities for boys and girls across the state within a five year period.

Sincerely yours,

Miles H. Miller

Miles H. Miller, Superintendent

MHM:mef

CARLTON PUBLIC SCHOOL
INDEPENDENT SCHOOL DISTRICT NO. 93
BOX 310
CARLTON, MINNESOTA 55718

James W. Schwartz, Superintendent of Schools
Walter B. Fischer, High School Principal
George Legueri, Elementary School Principal

(218) 384-4225 Superintendent's Office
(218) 384-4226 High School Office
(218) 384-4728 Elementary School Office

March 20, 1981

RECEIVED
MAR 24 1981
ADMINISTRATIVE HEARINGS

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson,

In the matter of licensure requirements for Head Varsity Coaches, the School Board of Independent School District 93 wishes to point out various problem areas that might occur.

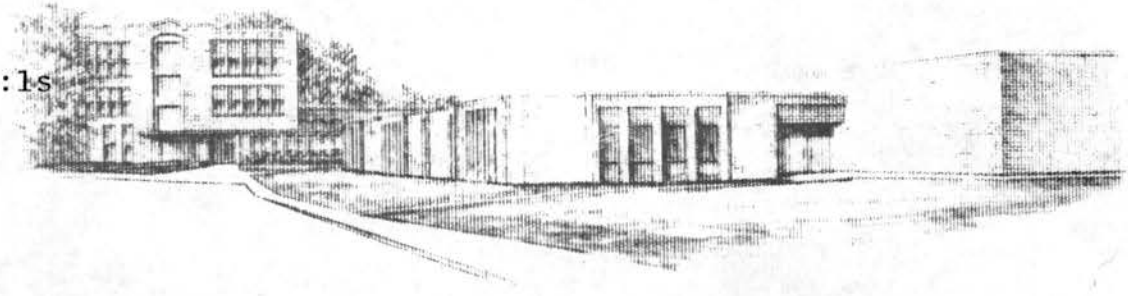
1. Small school districts will not be able to staff minor sports with certified staff, which will necessitate the dropping of sports activities.
2. The cost of upgrading staff to a certified position would increase an already over-extended budget.
3. Requiring a head coach to also be a certified teacher eliminates a possible source for coaches that with proper selection procedures could provide qualified people who will insure safety, prevention of injury and the proper instruction of students.

Briefly, the Carlton Board believes in the principles behind the rule change, but feels the end result will be the cancellation of sports activities, and therefore, students will suffer. We believe that the possibility of using non-teachers for head coach shoudl be examined, and the proper regulations be developed to ensure the protection of our children when using non-licensed teachers as head coaches.

Sincerely,

James W. Schwartz
Superintendent of Schools

JWS:ls



DONALD N. BUNGUM
SUPERINTENDENT OF SCHOOLS
CHISAGO CITY, MINN. 55013
PHONE (612) 257-5600

SIG E. STENE
ADMINISTRATIVE ASSISTANT
CHISAGO CITY, MINN. 55013
PHONE (612) 257-5600

Chisago Lakes Area Schools

INDEPENDENT SCHOOL DISTRICT NO. 141
LINDSTROM, MINNESOTA 55045

ROBERT A. MASCHE
HIGH SCHOOL PRINCIPAL
LINDSTROM, MINN. 55045
PHONE (612) 257-1130

JERRY SCHRADER
JUNIOR HIGH SCHOOL PRINCIPAL
LINDSTROM, MINN. 55045
PHONE (612) 257-6500

STEVEN A. BROMBERG
PRIMARY SCHOOL PRINCIPAL
CHISAGO CITY, MINN. 55013
PHONE (612) 257-2955

ERMA E. HANSON
INTERMEDIATE SCHOOL PRINCIPAL
CHISAGO CITY, MINN. 55013
PHONE (612) 257-5602

RECEIVED
APR 2 1981
ADMINISTRATIVE HEARINGS

April 1, 1981

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, Minnesota 55104

Dear Mr. Erickson:

The Board of Education of the Chisago Lakes Area Schools, at its meeting on March 26, reviewed the proposed regulations for licensure requirements for head varisty coaches of interscholastic sports in senior high schools.

It is our considered opinion that the proposed rules would work a very severe hardship on some schools in the State of Minnesota because of declining enrollments and lack of available coaches. These rules would only make it more difficult to provide learning opportunities for students in the extra-curricular area. It is our suggestion that these rules not be implemented at this time.

Thank you in advance for consideration of our position.

Sincerely,

Ethel Montgomery

Ethel Montgomery, Clerk
Board of Education

EM:bd

AN EQUAL OPPORTUNITY EMPLOYER

DR. PETER H. OVERGAARD, Chairman; MARY ANN KOCH, Vice-Chairman; ETHEL I. MONTGOMERY, Clerk;
EUNICE A. ANDERSON, Treasurer; THOMAS SPENCE, Director; ROBERT A. HEILIG, Director

Independent School District 611
Cyrus Public Schools
Cyrus, Minnesota 56323

MICHAEL HRUBY
Superintendent
612-795-2216

LOWELL HOFFMAN
High School Principal
612-795-2217

RECEIVED
MAR 10 1981
ADMINISTRATIVE HEARINGS

March 9, 1981

Mr. Peter Erickson, Hearing Examiner
Room 300
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Erickson,

RE: Proposed Rule Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools.

I would like to have you enter our opposition to the above proposed rule which will go to public hearing on Thursday, April 2. Our opposition should be listed as "strongly opposed".

Too often rules are proposed which are short sighted in nature. They fail to take into account that there is that 90% portion of the State known as "rural Minnesota" and that while we are a might bit short on population, we none-the-less do have 80-90% (in number) of the school districts in the State. We also are unable to attract the vast numbers of teachers as readily as those in the urban areas.

Because of the different aspects listed above, the Board of Education of Cyrus Public Schools feels that the proposed rules in their current form would create an extreme hardship on our school district, both in the immediate and in the long term.

As I will be unable to testify at the hearings, I would like to have you add our written concerns on this matter to the record.

Sincerely,

Michael Hruby

Michael Hruby, Superintendent

BOARD OF EDUCATION

KEN LINDOR, Clerk
LYLE HANSEN, Chairperson
LEON SLONEKER, Treasurer
WAYNE BRIGHT, Director
JERE ETTESVOLD, Director
GERALD WIGER, Director

SF-00006-01

STATE OF MINNESOTA

Office Memorandum

DEPARTMENT of Education

RECEIVED
APR 9 1981
ADMINISTRATIVE HEARINGS

TO : Peter Erickson
Hearing Examiner

DATE: April 6, 1981

FROM : Dr. George B. Droubie, Manager
Personnel Licensing and Placement

PHONE: 6-2046

SUBJECT: Attached newspaper article

The Department of Education quoted from this newspaper article during our public hearing on coaching licensure held on April 2, 1981. Therefore, at this time, we are submitting this to you to incorporate as part of the record.

Please contact me if you should have any questions regarding this.

GBD/pac

Attachment

St. Paul
Sunday Pioneer Press

Sports

Metro Final
February 8, 1981

Study points to need for better health care

Many prep athletic injuries preventable

By Sandra Peddie
Staff Writer

There is no hesitation in Dan Baustian's voice, not even a quiver, when he is asked. He remembers the day — it is perhaps one of the few days in his 25 years that is so indelibly imprinted upon his memory. He even manages a wry smile when he says:

"Feb. 3, 1973."

He was on his hands and knees that day, his shoulders square to the mat. He was grappling with a wrestler from another school and hoping for a decision, maybe even a pin.

They weren't heavyweights, just two boys competing in the 105-pound weight division in an eight-school invitational at Minneota High School. Baustian's opponent put a hold on him — nothing special, "just a regular wrestling hold," he says now.

Then his neck gave way.

Baustian doesn't mention pain, startled gasps, panicked adults rushing to his aid.

"I just couldn't move," he says now, offering no other details.

The events after that he lists coolly and quickly, skipping over the anguish in order to spare the listener and, perhaps, himself. The 50 days in intensive care for several broken vertebrae, four months in a Sioux Falls hospital and four more at the Sister Kenny Institute in Minneapolis.

SportSpecial

And the rest of the time in a wheelchair. Baustian is paralyzed from the neck down.

He speaks with no bitterness of the accident, blames no one. "It was just a real freak accident. It could have happened anywhere."

He takes care to emphasize the positive now, softly mentioning the people he has met and the things he has seen because of the accident. The only trace of sadness emerges when he talks about farming, the life he knew growing up in southern Minnesota.

"I'd love to farm," he says, gazing downward. "That's what I'd be doing now had I not been injured."

But Baustian will not farm. Instead, he will begin vocational school in the spring. He isn't sure just what he'll study.

He has no regrets about wrestling. He says he still likes to watch it now, and if he had children, he'd want them to participate in sports.

"What happened to me isn't going to happen to everybody," he says.

Baustian is right. It doesn't happen to everybody. But since 1971, two high school athletes a year have been paralyzed as a result of spinal cord injuries sustained in sports, according to Susan Gerberich, research director at Fairview Hospital's Institute for Athletic Medicine in Minneapolis.

Those are the reported injuries. Other serious and potentially serious injuries have not been reported. One reason is that there is no systematic method for recording or report injuries.

But sometimes emergency care personnel on hand do not recognize the severity of the injuries.

Baustian says he had appropriate medical care. A doctor was on the scene, ready with a neck brace. His wrestling coach at

See SportSpecial, Page 4

SportSpecial: Preventing prep injuries

Continued from Page 1

Jasper High School was trained in emergency techniques, and Baustian was taken to the hospital immediately.

Other athletes are not so lucky.

Gerberich conducted a comprehensive study of injuries and health care available in high school varsity football in 103 Minnesota high schools. She surveyed 3,063 players and 101 coaches for a recently completed doctoral thesis.

AMONG 112 PLAYERS who acknowledged a loss of consciousness, 69 percent returned to play the same day, according to Gerberich's study. Of 485 players who experienced a loss of awareness (a form of concussion), 81 percent were sent back into the game.

That's not the proper way to handle such an accident. "The way we treat anyone who's knocked unconscious is to take them to the hospital right away, period," says Jeff Monroe, assistant trainer for the Minnesota Gophers' basketball team and president-elect of the Minnesota Athletic Trainers Association. (Monroe is among those pushing for state certification of athletic trainers.)

The reason is the potential for a concussion, an injury so serious it can lead to death.

JOSEPH GRAFFT, emergency care director at Spring Lake High School, recalls the case of a young football player two years ago. He was hit and knocked dizzy twice, but was sent back into the game, nonetheless. The player later died in a hospital. No one had known at the time of the game that he had suffered a concussion.

"A lot of injuries go unrecognized at the high school level," Monroe says. "We are concerned about the potential for harm."

Serious, and potentially fatal, injuries occur in every sport. In June 1976 Steven Heddrath, a 17-year-old Fridley hockey player, died after choking on his mouthpiece in a summer league game in June 1976.

IN A UNIVERSITY of Washington study conducted by James Garrick and Ralph Requa, injury rates in 19 high school sports were calculated. The highest rates were in football with 81 injuries per 100 players and wrestling, with 75. The lowest rates were in men's tennis, with three injuries per 100 players and men's swimming, with only one.

In the Minnesota study, Gerberich found an overall rate of 78 per 100 players, and that was among 51 percent of all players. She found a significant injury rate of 40 per 100 players. A significant injury was defined as one that kept a player from a game, practice or regular activity for a week or more.

Injuries are part of the game, and players, sensitive to peer pressure and anxious to get back into the game, often minimize their pain. Bill Hahlbreder, North St. Paul hockey coach remembers that he "liked playing hurt." He had plenty of experience with that as a hockey player — over the years, he collected a broken nose, fractured jaw, more than 100 stitches in his face and lost an eye.

SOME TRAGEDIES, like that of Dan Baustian, cannot be prevented. But others can be, argue Gerberich, Grafft, Davis and others.

Ken Davis, Columbia Heights aquatic director remembers hearing about the Fridley hockey player's death. He wonders about the time lag involved and stresses the importance of emergency care training because the first few moments after the injury occurs are critical.

Grafft adds that basic first-aid training is essential and says many Minnesota high school coaches lack even that. In her study, Gerberich found that only 25 percent of the coaches were prepared in current first-aid information. Because techniques change constantly, it is important to stay up to date.



Sully Doroshow / Pioneer Press

Jim Johnson rehabilitates a leg injury at St. Anthony Orthopaedic Clinic. Johnson, 17, suffered the injury playing soccer for Tartan High School.

"Some coaches are still soaking ankles in hot water," Grafft complains.

AND IT IS the head coach who is the key to reducing injuries, Gerberich found. The better prepared he is in health care, the safer his athletes will be. That means current first-aid information, course work in injury care and prevention, coaching clinics and training in such things as cardiopulmonary resuscitation.

That places a heavy burden on the coach, a teacher who already is overworked and probably underpaid for his efforts. And as schools continue to lay off more and more teachers, it will be harder to find the people who are willing to put the sacrifice coaching requires.

Gerberich points out that the coach's role isn't to be a doctor and yet he is placed in that position. "It's really not fair. He can't be everything to all people."

HAHLBREDER AGREES: "When I'm at the game, my specific job is to coach. To coach and train at the same time is a lot to ask of an individual." And Hahlbreder, who also teaches physical education, feels more prepared than many because he has first aid training, knows cardiopulmonary resusitation and other emergency techniques, has 16 years of coaching experience and recently completed his master's degree in physical education.

Some coaches balk at the suggestion of getting more training because it means they'll have to spend their own time and money doing it. "Schools are not going to pay for it," says John Bartz, North St. Paul athletic director.

Many coaches, like Mal Scanlan, the football coach at Johnson High School, take advantage of free workshops and seminars offered by such places as the St. Anthony Orthopaedic Clinic in St. Paul. The clinic offers workshops covering a variety of subjects once a month in nearly every sport, according to physical therapist Tim Carr. The staff plans to expand the program beyond the metropolitan area.

SCANLAN, WHO IS in his 15th year of coaching, is struck by the changes over the years in training advice. "We laugh at the warmups we did in high school — two laps and you start," he says. The stretching exercises he now requires "make you look almost like a ballet dancer."

Such preventive measures can go a long way in reducing injuries, but they aren't what is needed when the accident occurs. Over and over again in the interviews for this article, the need for well-trained personnel, in addition to the coach, at games and practices was stressed.

The budget crunch confronting many schools today means that a trainer on the staff is a luxury often cut.

NOW A TRAINER is hired for the hockey games, but neither the school nor the conference has a full-time trainer on the staff. In fact, few schools can afford to have full-time trainers on their staffs.

And coaches are keenly aware of those budget pressures. Grafft remembers seeing a coach turn down an ambulance when a player broke his leg and instead took him to the hospital in his station wagon after the game in order to save money.

Coaches sometimes are downright angry at what they perceive as the interference of trainers, Grafft says. He recalls the time a coach ordered him to remove his emergency van from the field area because the sight of it was "morbid." There have been other times when Grafft was ordered off the field.

"Ultimately, the whole school structure is based on money and politics," Davis contends. "Many times the student is forgotten."

He adds, "At what point do we put a value on a human life?"

Section I. specifies that coaching licenses may be renewed under the same system that coaches use to renew their teaching licenses in other fields. It will not be necessary for coaches to follow a separate system for renewal of the coaching license.

In summary, the State Board of Education believes that this proposed coaching licensure rule is both needed and reasonable. The Board believes that the preparation outlined in the rule is the minimum amount of preparation needed to serve as a head varsity coach, while at the same time providing for any potential hardship situations that school districts may face in staffing coaching positions.

MINNEAPOLIS PUBLIC SCHOOLS
Department of Health, Physical Education and Athletics

Hearing examiner and members of the Board of Teaching, my name is Donald W. McMoore, Director of Health, Physical Education and Athletics for the Minneapolis Public Schools.

As Director of Athletics for the Minneapolis Public Schools, included in my responsibilities is the task of working with building principals and the Personnel Department in an effort to fill coaching positions at the ten high schools.

Because of the tremendous number of turnovers of staff within the district in the past few years, it has become a horrendous task to fill positions with local staff people. As a result of this and in an effort to continue to provide boys and girls with athletic opportunities, many non-teachers have been hired to coach who, in my judgment, have the expertise to perpetuate what I deem as being a quality program.

This move has become necessary because many of our older teachers have made the choice to discontinue coaching. As you are aware, Special School District #1 like many other districts, is experiencing an enrollment decline. This decline has forced reductions in the number of teachers needed. In addition, the reductions, because of teacher senority provisions, have come from the ranks of less experienced teachers; generally, it is from these ranks that we recruit coaches. In a large district, such as Minneapolis, the more experienced teachers may have "coaching burnout" or have not kept up-to-date with additional requirements for coaching certification. There may be a conflict of interest between the seniority rights of teachers and the need for qualified coaches in districts with declining student enrollments.

RESOLUTION TO THE MINNESOTA BOARD OF TEACHING

WHEREAS, the Minneapolis Public Schools sponsors twenty-one interscholastic athletic opportunities for boys and girls enrolled in the district's ten high schools;

AND WHEREAS, these interscholastic options are part of the overall educational program for boys and girls;

AND WHEREAS, citizens expect the Minneapolis Public Schools to continue to provide this variety of educational opportunities;

AND WHEREAS, the school district's employment policies state that seniority is the deciding factor in determining tenure for its teachers;

AND WHEREAS, as a direct result of the seniority factor determining employment, many young teacher-coaches are being excessed because of declining enrollment;

AND WHEREAS, many older teachers have made the decision to discontinue involvement in these twenty-one interscholastic athletic opportunities for boys and girls;

AND WHEREAS, in the ensuing years, some schools, because of varied reasons including lack of coaches, may curtail participation in some of these educational opportunities;

AND WHEREAS, because of these curtailments in particular schools, boys and girls may be deprived of the option to continue to participate;

NOW THEREFORE BE IT RESOLVED THAT: The Department of Health, Physical Education and Athletics of the Minneapolis Public Schools requests that the Minnesota Board of Teaching repeal the suggested requirememts for coaching licensure as outlined in the proposal 5 MCAR 1.0533 regarding Head Varsity coaches of Interscholastic Sports in senior high schools. If the above resolution is not acceptable, Minneapolis, being a city of the first class, requests permission to inservice coaches for licensure.

Rule as Proposed (All New Material)

RECEIVED
JAN 14 1981
ADMINISTRATIVE HEARINGS

Chapter Twenty-Seven A: Licensure of Supervisory and Support Personnel; Issuance, Suspension, and Revocation

5 MCAR § 1.0533 Head varsity coaches of interscholastic sports in senior high schools.

A. Applicability. Every senior high school shall have a licensed head varsity coach for each interscholastic sport except as otherwise provided in C., below. Each person who is employed and functions as a head varsity coach of an interscholastic sport in a senior high school shall hold a valid Minnesota teaching license and shall satisfactorily complete a preparation program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches of interscholastic sports.

B. Definitions. For purposes of this rule, the following definitions shall apply:

1. Head varsity coach. The teacher who has the primary responsibility for a senior high school varsity interscholastic sport.

2. Interscholastic sports. A sport in which there is scheduled competition with athletic teams of another school within and outside the school district.

3. Senior high school. A secondary school consisting of grades 10-12 or grades 9-12 in a four-year secondary school and grades 9-12 in six-year secondary schools.

C. Scope. Nothing in this rule shall prohibit a school district from employing an unlicensed person as assistant to a licensed head varsity coach of an interscholastic sport or to coach a junior high school sport.

D. Qualifications for licensure. All candidates recommended for licensure as a head varsity coach of interscholastic sports shall have satisfactorily completed a program approved by the Minnesota Board of Education consisting of a maximum of 12 quarter or 9 semester hours containing components designed to provide candidates recommended for licensure with knowledge, skills, and understandings in all of the following areas:

1. First aid and prevention and care of athletic injuries.

2. Science of sports, including principles of anatomy and kinesiology and principles of exercise physiology.

3. Theory and practice of sports techniques.

4. Psychology of sports and coaching.

5. Satisfactory completion of a supervised field experience in coaching consisting of no fewer than 40 clock hours.

E. Alternative route to licensure. A school district may contract with Minnesota colleges and universities which offer approved programs leading to the licensure of head varsity coaches to develop jointly the program of instruction outlined above. Such jointly developed programs must be approved by the Minnesota Board of Education. Recommendation of candidates for head varsity coaching licensure shall be the responsibility of the college or university through which the program was developed.

F. Teachers employed as head varsity, assistant, or junior high school coaches prior to July 1, 1982. A person holding a valid Minnesota teaching license who, prior to the effective date of this rule, is currently employed or was previously employed as a head varsity, assistant, or junior high school coach, as verified by the superintendent of schools of the school district employing the coach, and who can provide verification of completion of six quarter hours or 60 clock hours of instruction in first aid and the prevention and care of athletic injuries shall, upon application, be issued a license as head varsity coach of interscholastic sports.

G. Effective date. The provisions of this rule are effective on July 1, 1982, for applicants for the initial license as a head varsity coach of interscholastic sports.

H. School district hardship situations. In cases where a local school district is unable to employ a licensed head varsity coach of interscholastic sports, the superintendent of such school district may request the commissioner of education to grant a provisional license for one school year and renewable for a maximum of one additional school year to a teacher to serve

as a head varsity coach of an interscholastic sport upon evidence submitted by the superintendent of schools that the following conditions have been met:

1. Evidence that the school district is unable to employ a licensed head varsity coach of interscholastic sports for the current school year, and

2. The person to be employed under such authorization holds a current, valid Minnesota teaching license, and

3. The person to be employed under such authorization is currently enrolled in a program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches of interscholastic sports.

I. Licenses as head varsity coaches shall be renewed according to provisions of 5 MCAR § 3.005 continuing education/relicensure.

Department of Education

Special Services Division

RECEIVED
JAN 14 1981
ADMINISTRATIVE HEARINGS

It is estimated that there will be approximately 100 persons in attendance at the rules governing head varsity coaches of interscholastic sports hearing. The length of hearing approximately four to six hours.

These rules will not cost over $100,000.

The facility where the hearing is to be conducted is free of mobility barriers in accordance with Executive Order No. 79-15.

RECEIVED
MAR 5 1981
ADMINISTRATIVE HEARINGS

All statements of information and comment must be received by November 1, 1980. Any written material received by this date will become part of the record of any rules hearing held on this subject.

July 28, 1980

Howard B. Casmey, Secretary
State Board of Education

Notice of Intent to Solicit Outside Opinion Concerning a Proposed Rule Relating to Licensure of Directors of Special Education

Notice is hereby given that the State Board of Education is considering adoption of a rule which would govern the licensure of directors of special education.

The proposed rule is authorized by Minn. Stat. § 125.05, as amended by Laws of 1980, ch. 345, § 2, which establishes authority for the Board of Education to license supervisory and support personnel, which includes professional employees who devote 50 percent or more of their time to administrative or supervisory duties over other personnel.

All interested or affected persons or groups may submit information on this subject. Written or oral information and comment should be addressed to:

George B. Droubie, Manager
Personnel Licensing and Placement Section
Special Services Division
Minnesota Department of Education
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

All statements of information and comment must be received by November 1, 1980. Any written material received by this date will become part of the record of any rules hearing held on this subject.

July 28, 1980

Howard B. Casmey, Secretary
State Board of Education

Notice of Intent to Solicit Outside Opinion Concerning a Proposed Rule Relating to Head Varsity Coaches of Interscholastic Sports

Notice is hereby given that the State Board of Education is considering adoption of a rule governing licensure standards for head varsity coaches of interscholastic sports in senior high schools.

The proposed rule is authorized by Minn. Stat. § 125.05, as amended by Laws of 1980, ch. 345, § 2, which establishes authority for the Board of Education to license athletic coaches.

All interested or affected persons or groups may submit information on this subject. Written or oral information and comment should be addressed to:

George B. Droubie, Manager
Personnel Licensing and Placement Section
Special Services Division
Minnesota Department of Education
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

All statements of information and comment must be received by November 1, 1980. Any written material received by this date will become part of the record of any rules hearing held on this subject.

July 28, 1980

Howard B. Casmey, Secretary
State Board of Education

Edu # 1

State Board of Education
Department of Education
Special Services Division

Notice of Intent to Solicit Outside Opinion Concerning Proposed Rules Relating to Supervisory and Support Personnel

Notice is hereby given that the State Board of Education is considering adoption of rules for the licensure of supervisory and support personnel.

The proposed rules are authorized by Minn. Stat. § 125.05, as amended by Laws of 1980, ch. 345, § 2, which establishes authority for the Board of Education to license supervisory and support personnel. The proposed rules would establish reasonable standards and procedures for the issuance, renewal, suspension, and revocation of licenses of supervisory and support personnel. For the purpose of licensure, supervisory and support personnel, as defined by Minn. Stat. § 125.03, as amended by Laws of 1980, ch. 345, § 1, includes superintendents, principals, professional employees who devote 50 percent or more of their time to administrative or supervisory duties over other personnel, as well as counselors, school nurses, athletic coaches, and other professional employees who engage primarily in non-classroom activities. The term does not include librarians, school psychologists, school social workers, audio-visual directors and coordinators, recreation personnel, media generalists, media supervisors, or speech therapists.

All interested or affected persons or groups may submit information on this subject. Written or oral information and comment should be addressed to:

George B. Droubie, Manager
Personnel Licensing and Placement Section
Special Services Division
Minnesota Department of Education
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

All statements of information and comment must be received by September 15, 1980. Any written material received by this date will become part of the record, in the event rules concerning this subject are adopted.

July 28, 1980

Howard B. Casmey, Secretary
State Board of Education

Notice of Intent to Solicit Outside Opinion Concerning a Proposed Rule Relating to Standards of Professional Conduct for School Administrators, Supervisory, and Support Personnel

Notice is hereby given that the State Board of Education is considering adoption of a rule governing standards of professional conduct for school administrators, supervisory, and support personnel.

The proposed rule is authorized by Minn. Stat. § 125.05, as amended by Laws of 1980, ch. 345, § 2, which establishes authority for the Board of Education to license supervisory and support personnel. The proposed rule would establish reasonable standards of professional conduct, complaint procedures, and enforcement procedures for school administrators, supervisory, and support personnel. The proposed rule would apply to superintendents, principals, professional employees who devote 50 percent or more of their time to administrative or supervisory duties over other personnel, as well as counselors, school nurses, athletic coaches, and other professional employees who engage primarily in non-classroom activities.

All interested or affected persons or groups may submit information on this subject. Written or oral information and comment should be addressed to:

George B. Droubie, Manager
Personnel Licensing and Placement Section
Special Services Division
Minnesota Department of Education
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Bloomington PUBLIC SCHOOLS
INDEPENDENT SCHOOL DISTRICT #271

DIRECTOR OF ATHLETICS
8900 PORTLAND AVENUE SOUTH
BLOOMINGTON, MINNESOTA 55420

August 27, 1980



Mr. George B. Droubie, Manager
Personnel Licensing and Placement Section
Special Services Division
Minnesota Department of Education
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Mr. Droubie:

I am writing in objection to the proposed rule for the licensure of head varsity coaches of interscholastic sports in the senior high school. As Athletic Director for Bloomington School District 271, I have reviewed the proposed rule for licensure of coaches and have concluded that this rule would have a serious effect on our interscholastic program.

As a multiple school district we have a total of seventy-five varsity girls and boys athletic teams. This does not include junior high school teams, nor B and C teams. Needless to say, we need many coaches to coach our athletic teams. We are also a school district with declining enrollment. We are unable to hire new teachers/coaches into our system and are losing teachers/coaches every year.

To further compound our problem we have a rapidly maturing staff. This year over 50% of our staff has reached the top of our salary schedule in terms of years of service. Last year 67% of our staff had advanced degrees and this year the figure will be higher. What all this means to us in athletics is that more and more of our teachers are choosing not to continue coaching any longer as they increase in years of teaching service and as they progress to advanced degrees.

At the present time 31 of 39 of our head coaches in boys' athletics have coaching licenses and 17 of 36 of our girls' head coaches. I am concerned that if the qualification for being a head coach were to be increased that many of those now coaching who do not have coaching licenses would retire rather than seek certification. The area where we would be hurt most severely would be in girls' athletics. Bloomington has been a leader in providing for equal facilities, coaching and comparable financing for girls' athletics. Our present position and our goals for the future for girls' athletics would be seriously negated by the proposed rule.

In conclusion, I would encourage that the proposed rule be defeated for the sake of our continuing athletic programs for the girls and boys of our state.

Sincerely,

Sonny Carlson

Sonny Carlson
Director of Athletics
Secondary Schools

SC:rho

MANKATO STATE UNIVERSITY

COLLEGE OF EDUCATION/Office of the Dean (507) 389-1215

MANKATO, MINNESOTA 56001

JAN 1981
PERSONNEL LICENSING

December 22, 1980

Dr. George Droubie
Department of Education
610 Capitol Square Building
St. Paul, MN 55101

Dear Dr. Droubie:

Your proposed coaching licensure rule has been circulated throughout our College of Education. Below are some comments that we would like to offer.

1. The immediate reaction to the proposal is that by placing a maximum of 12 hours for licensure, it appears there is little to be required of varsity coaches. In fact, with the apparent approval of six hours for first aid and prevention of athletic injuries (Section F) and a four credit hour supervised field experience (Section D), there would only be two hours of credit available for covering science of sports, anatomy and kinesiology, exercise physiology, theory and practice of sports techniques, and psychology of sports and coaching. It appears immediately that at least another six hours should be required.

2. If athletics is supposed to be a part of a fully-rounded curriculum, the deficiencies of this rule become even more apparent. At an age where proper attituded toward athletic competition should be developed as well as proper skills--the junior high-aged student--there is no licensure requirement for head coaches.

3. Section F, which will have the effect of "grandfathering" coaches, is overly liberal with its only academic requirement of six hours of first aid and prevention of athletic injuries. It would appear at least necessary that some training in the techniques of coaching the particular sport be required.

4. Although it is recognized that some of the licensure requirements have become too stringent, this proposal is equally too little. The principal value seems to be one of making it as easy as possible to find someone, teaching or not, who would agree to be the head coach.

Please feel free to contact me if you have any questions on these comments.

Sincerely,

Duane C. Orr

Duane C. Orr, Dean
College of Education

DCO/dc

CHIEFTAIN BOND
50% COTTON FIBER

ADMINISTRATIVE OFFICES
1001 HIGHWAY 7
HOPKINS, MINNESOTA 55343

HOPKINS
SCHOOL
DISTRICT

A. E. EDSTROM
Director of
Administrative Services



December 30, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I am replying to the working draft, dated November, 1980, on 5 MCAR, Head varsity coaches of interscholastic sports in senior high schools.

The only section which needs reconsideration and revision, in my opinion, is section H. on hardship situations. Inasmuch as we see the situation not improving in a school district's ability to find teachers to assume head coaching positions, it is felt that an adult, qualified in other ways but without a teaching license, should be granted a provisional one-year license. Without this there will undoubtedly be a number of sports dropped due to the lack of licensable personnel.

Thank you for your consideration of this suggestion.

Sincerely,

A. E. Edstrom
Director of Administrative Services

AEE:pw
cc: G. Reynolds
D. Lund
A. Bruning

Roseville Area Schools
Arden Hills, Falcon Heights, Lauderdale, Little Canada, Maplewood, Roseville, Shoreview
District 623

SCHOOL BOARD

Suzanne K. Welsch, Chairman
Joanne Cushman, Clerk
Walter Parsons, Jr., Treasurer
Donald E. Bauman, Director
Carole Kronenberg, Director
David E. Monson, Director

DR. LLOYD C. NIELSEN
Superintendent



December 16, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

Your draft of the proposed coaching rule has been reviewed by Roger Wald, Director of Secondary School Services, the principals and athletic directors in District 623. Their recommendation is that considerable work needs to be done before the proposal would be workable.

Of the eighteen head coaches at Kellogg in 1980-81, nine would not qualify under the proposed change. Of the seventeen head coaches at Ramsey, three would not qualify. The likelihood of replacing these head coaches with other faculty members who are licensed, or with non-faculty who are licensed as a teacher and a coach, is simply impossible. Due to declining enrollments and staff reduction, we are having great difficulty in maintaining coaches under the present regulations.

Please contact Mr. Wald or myself if we can be of any further help to you on this.

Sincerely,

Lloyd C. Nielsen

Lloyd C. Nielsen
Superintendent

LCN:jk



LAKE SUPERIOR SCHOOL DISTRICT
I.S.D. 381
TWO HARBORS, MN 55616

DWIGHT C. MOE
Administrative Assistant
Two Harbors, Minnesota 55616
Phone 218-834-5143

ELMER J. FRAHM
Superintendent of Schools
Two Harbors, Minnesota 55616
Phone 218-834-5143

GEORGE P. STARKOVICH
Administrative Assistant
Silver Bay, Minnesota 55616
Phone 218-226-3102



December 17, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

I have reviewed the latest draft of the proposed coaching rule that will be brought to the State Department of Education for the purpose of establishing a Hearing date.

We see no problems with most aspects of the suggested policy. However, the legalizing of uncertificated teachers to service students is a concern particularly where junior high students are to be coached by people not trained in the area of athletic injury, first aid, and CPR. Young people are highly susceptible to injuries at this age and the liability along with the potential for lasting damage to the participants are very high.

Sincerely,

E. J. Frahm
Superintendent

EJF:bws

RICHARD WICKMANN,
Senior High School Principal

RICHARD HANSEN,
Ass't. Senior High School Principal

GALE J. ROTH,
Business Manager

GLENCOE PUBLIC SCHOOLS

INDEPENDENT DISTRICT NUMBER 422

GLENCOE, MINNESOTA 55336

Telephone 864-3165

Verdie L. Ellingson, Superintendent

NOEL L. PHIFER,
Middle School Principal

ROBERT L. HOPPIE,
Elementary Supervisor



December 17, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

This letter is submitted as a reaction to the latest.working draft copy of regulations for head varsity coaches.

We feel the new draft is a substantial improvement over where we started a couple years ago. This proposal is one we can live with in our district. I would hasten to add however, we support the additional exclusion which has been submitted by a Committee of MASA. This provision would help take care of the situation where a school cannot find the qualified teacher - coach but has available a candidate who is well prepared to handle the coaching assignment.

Respectfully,

Verdie L. Ellingson

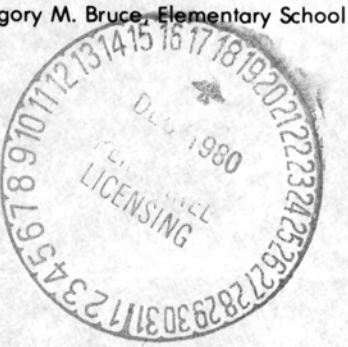
Verdie L. Ellingson
Superintendent of Schools

Borup Independent School District No. 522

Borup, Minnesota 56519

Dr. Gerald R. Bass, Superintendent
Thomas M. Witherow, High School Principal
Gregory M. Bruce, Elementary School Principal

December 16, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building, 550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

During the past several days I have been reviewing the working draft of the regulations regarding licensure of coaches. After discussing the proposed regulations with my staff and with school board members, I have arrived at several conclusions (particularly relevant to the impact of the regulations on the small high school).

First, I applaud your staff for a reasonable, effective set of regulations. In particular, the "grandfather" clause recognizes the fact that prior experience is as good as (or better than) college course work in preparing coaches.

Second, from the standpoint of a small high school, there are often not enough staff members (teachers) to provide the necessary head coaches. Given the fact that a district such as ours may have a number of commuting teachers and teachers with outside interests, I feel that it is unrealistic to expect that all head coaches also be licensed teachers. I would like to have a provision that would allow a non-teacher to take the necessary course work (perhaps with additional hours required) and receive coaching licensure. There are many good reasons to want the head coaches to be teachers, but there are situations in which districts are unable to secure licensed coaches within the teaching staff. I believe that the local districts should have the option of hiring "lay" people who are certified to coach but not to teach. This request also holds for the "hardship" situations. We will in all probability be in a situation next year where we will not have anyone on our staff qualified or willing to take one head coaching position. It is not fair to students or staff to force a teacher to take a head coaching job when there are others in the community who are qualified (but not certified under these regulations) to assume such a position.

Thank you for your consideration of these suggestions. I would be happy to discuss at greater length and/or clarity the positions I have taken.

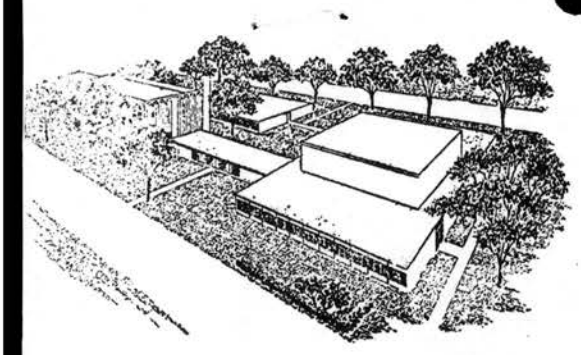
Sincerely,

Gerald R. Bass
Superintendent

Board of Education

Joseph E. Miller, Chairman
Cecil Sprenger, Clerk
Gary Workman, Treasurer
Robert Smith, Director
Shawn Crompton, Director
John Arends, Director

cc: Richard Anderson, MSBA
Thomas Witherow, H. S. Principal



ELWOOD C. GUANELLA, SUPERINTENDENT
DOUGLAS BENIT, SEC. PRINCIPAL
DENNIS ANGELL, ELEM. PRINCIPAL

Independent School District No. 242

Attendance Centers at Alden and Conger

Telephone: 507-874-3240 or 507-874-3248 – Alden, Minnesota 56009

December 16, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar St.
St. Paul, MN 55101

Dear Dr. Droubie:

Our School Board has reviewed the language in the working draft on the proposed licensure rules for head coaches.

While in substantial agreement with what is proposed, the Board would like to see H - 2 deleted. They just feel that there could be times when one would not be able to find a certified teacher-coach and the rules as proposed would force the elimination of a particular program.

I myself question the certification standards of non-public school coaches and if lessor standards are all right for them, then we should be able to deviate to a lower one in times of stress too.

Sincerely,

Elwood C. Guanella

Elwood C. Guanella, Supt.

COLLEGE OF SAINT TERESA
WINONA, MINNESOTA 55987

DEPARTMENT OF EDUCATION



To: Dr. George B. Droubie, Manager
Personnel Licensing and Placement
St. Paul, Minnesota 55101

From: Sister Romana Walch, Chair. S. R.
Department of Education
College of Saint Teresa
Winona, Minnesota 55987

Subject: Proposed Coaching Licensure

Date: December 15, 1980

After receiving your communication of November 13 regarding a proposed ruling for licensure of coaches, I sent it to the staff of our Department of Physical Education for their consideration. Today I received their response and am sending it on to you. I respect their opinion in this matter. Certainly I am not prepared to make a fair judgment about the proposal.

MEMORANDUM

TO: Sr. Romana Walch

FROM: Jean Lovett, Athletic Director Jean Lovett

SUBJECT: Coaching Licensure

DATE: December 12, 1980

I agree with the attached proposal for coaching licensure. I have always believed in a system of high school coaching licensure, and I feel that this is a step in the right direction.

I am very concerned, however, about the qualifications of coaches on the junior high and elementary school level. I would like to see the Department of Education direct efforts to develop a system of identifying qualified coaches on that level also. There are many unqualified people in Minnesota serving as coaches for thousands of very impressionable children. These coaches are not trained in care and prevention of injuries, sports psychology or sports ethics; many have very distorted ideas about winning and losing; ideas that children pick up on and carry with them as they grow up.

southwest state university • marshall, minnesota 56258



December 15, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

Thank you for sharing the Working Draft of the rule governing licensure of head varsity coaches with us and providing sufficient time for our response.

Relative to Section D, the provision for only 12 quarter hours in which to build the required knowledge, skills and understandings is at best minimally workable. The level of attainable competence would be necessarily low. We understand the conflicting needs and desires of the various parties interested in the license. However, we feel that it will be very difficult to attain a desirable level of competence with such a small credit allowance.

Relative to Section G, the effective date of July 1, 1982, although early, is attainable for our University. Since there has been discussion of a similar rule previously, we have in place the necessary courses to meet the rule.

Thank you again for the opportunity to provide input.

Sincerely,

Richard Curry
Office of Academic Affairs

James Denevan, Chairman
Health and Physical Education

cc: Dean C. Eismann

Telephone 507/537-7021
Southwest State University is an Affirmative Action / Equal Opportunity Institution

Detroit Lakes Public Schools

DETROIT LAKES, MINNESOTA 56501
PHONE 218-847-9271

ROBERT NESS,
SUPERINTENDENT
RICHARD J. LUNDEEN,
BUSINESS MANAGER

NELIA LORENTZEN, CHAIRPERSON
HAROLD TRIEBENBACH, CLERK
DUANE ERICKSON, DIRECTOR
HERMAN HULIN, DIRECTOR
DELMOURE HULTGREN, DIRECTOR
GEORGE JERNBERG, DIRECTOR

December 15, 1980



Dr. George Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

The regulation governing the licensure of athletic coaches as prepared by the Personnel Licensing and Placement Division of Special Services, has been reviewed by our athletic department, administration, and Board of Education.

The language as proposed by the Special Services Division is a good effort and reflects a realization of the need to address coaching requirements in the interest of the development of better coaches and yet recognize that school districts are having difficult times obtaining licensed coaches in all athletic activities. The hardship provision in the grandfathering clause for older coaches is well envisionsed and very necessary in any new regulation governing coaching licensure.

It was the unanimous concensus of our School Board, administration and athletic director, that Item 2, requiring a coach to be a licensed teacher, may force the curtailment of some athletic activities for our students. More specifically, we have approximately eighty (80) girls participating in gymnastics, with college graduates in other fields of endeavor, who are outstanding gymnasts in their own right, that are not eligible for a teacher license. Moreoever, we do not have anyone in sight, even for an assistant coach in gymnastics that has a teacher license. In effect, this would require us to drop gymnastics and create a problem of balance of athletic opportunities for girls in our school system. As a practical matter, there are very few teachers, much less with coaching licenses, who are experienced or qualified to coach an activity such as gymnastics.

We currently have some twenty-five (25) unlicensed assistant coaches employed by the Detroit Lakes Schools, who continue their elementary and junior high and assistant varsity coaching positions. Any change in the licensure requirement for assistant coaches would have a direct impact on the opportunities extended our students if these people were eliminated for some reason or other, through coaching licensure requirements.

We also request consideration of some coaching regulations, licensure provision, that would separate contact sports such as football and hockey from non-contact sports, such as tennis or golf, as we sincerely believe that students are often exposed to greater injury in a contact sport than in a non-contact sport. Perhaps requiring coaches to have a different kind of preparation for contact team sport activities is worthy of further consideration.

In summary, we appreciate the efforts that have been made to address a realistic coaching licensure requirement. We strongly feel that the requirement of a "licensed teacher" would seriously affect our program in the equalization of opporutnities for girls' activities in our school system. We also feel that there is a distinct difference between contact and non-contact sports and the requirements that a coach should have for the respective activities.

Any consideration given to this reponse, as the Committee considers establishing a coaching licensure requirement, would be sincerely appreciated.

Thank you.

Sincerely,

Robert R. Ness
Superintendent of Schools

RRN/kl

cc: Board of Education
Del Mollberg, Activities Director
Murrae Freng, Minnesota State High School League

East Grand Forks Public Schools

INDEPENDENT SCHOOL DISTRICT NO. 595

EAST GRAND FORKS, MINNESOTA, 5672■ 218-773-3494

December 15, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

This is to inform you that our Board of Education for Independent School District #595 and East Grand Forks went on record at the December 8, 1980 Board Meeting as supporting the Licensure Rule for High School Coaches as presented by the M.S.B.A. in their November 24, 1980 memo.

Respectfully submitted,

James Noonan

Dr. James Noonan
Superintendent of Schools

JN/cay



DISTRICT ADMINISTRATION
JAMES NOONAN, Superintendent
JOHN ROCHE, Assistant Superintendent
JERILYN KNOFF, Business and Finance Officer
LA NEVA NARUM, Superintendent's Secretary

INDEPENDENT SCHOOL DISTRICT NO. 282
ST. ANTHONY - NEW BRIGHTON
3303 - 33RD AVENUE NORTHEAST, MINNEAPOLIS, MINNESOTA 55418

December 12, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

The proposal for the licensure of coaches proposed by the State Board of Education would not present a problem for our school at the present time. In the future we may have a problem with the proposal that all head coaches must be licensed teachers. For our purposes, it would be best to strike H.2 of the proposal. Then we could employ non-licensed people under the hardship provision.

Sincerely,

Arnold W. Ness

Arnold W. Ness
Superintendent

AWN:nr

cc: R. Anderson
R. DeLapp



INDEPENDENT SCHOOL DISTRICT 473

STANLEY F. JANOWSKI, SUPERINTENDENT - 612-676-3146
THOMAS V. HOPPE, ELEMENTARY PRINCIPAL - 612-676-3494
CHARLES J. NIKOLAI, HIGH SCHOOL PRINCIPAL - 612-676-3101
ISLE, MINNESOTA 56342

December 12, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Re: Planned licensure requirements for head varsity coaches.

Dear Mr. Droubie:

In Isle Independent School District #473 the administration and athletic director have discussed the proposals for the future licensing of coaches. We object to the more stringent requirements for the following reasons:

1. Small, outstate schools already have difficulty finding people to coach the various sport activities. Making the requirements more difficult would further reduce the number of people available.

2. This action may force schools to hire teachers who hold coaching licensure but are incompetent in academic subject areas.

3. With the high cost of travel, an individual in our district would have to go through great expense to take the courses required. This would cause much hardship or eliminate some good people from coaching. The students would be the losers.

4. In many cases college students would not be able to complete the requirements in a subject area major, teaching minor, and coaching in four years. This will drive more persons away from teaching as a career.

5. Due to the lack of funding, this school district has already been forced to cut student programs. I believe these added requirements are inflationary and that they will increase the cost of athletic programs. This will result in more program cuts and again the students will be the losers. Programs in schools directed by interested and dedicated teachers must surely be better than chemical abuse and alcohol in gravel pits!

We hope that projecting our problems and voicing our concerns will influence your final decisions.

Sincerely,

Stanley F. Janowski

SFJ:hk

DISTRICT 742 COMMUNITY SCHOOLS

District Administration Building
628 Roosevelt Road, St. Cloud, Minnesota 56301 (612) 253-9333

Clear Lake • Clearwater • Collegeville • Luxemburg • Waite Park • St. Joseph • St. Cloud • St. Augusta

KERMIT EASTMAN, Superintendent
LOWELL BELL, Assistant Superintendent Personnel
DR. JAMES HENNING, Director Planning and Research
HERSCHUEL HOWELL, Assistant Superintendent Business
DR. HARRY WENNER, Assistant Superintendent Instruction

December 11, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

This letter is written relative to the proposed rule changes for coaches in public schools in Minnesota.

We feel that Items D and F related to first aid may be too restrictive. We feel that the schools could be responsible for seeing to it that a coach took a first aid course. For example, our school district would plan to offer a first aid course annually for our own staff members and we certainly could invite coaches from neighboring districts.

Our main concern is that this requirement might become so restrictive that we would be unable to get people to serve as coaches for many of the activities.

Your consideration of this concern and recommendation is appreciated. I will also say that we find the total proposal a significant advancement from other proposals that have been considered in the past.

Sincerely,

Kermit L Eastman

Kermit L. Eastman
Superintendent of Schools

KLE:mk

District 742 Community Schools is an equal opportunity/affirmative action employer and is in compliance with Title IX of the Education Amendments of 1972

Albany Area Schools

District No. 745
ALBANY, MINNESOTA 56307

Administrative Office Telephone (612) 845-2171

Avon Elementary School (612) 356-7346
Farming Elementary School (612) 548-4955

Albany Senior High School (612) 845-2171
Albany Junior High and Elementary School (612) 845-2161

December 12, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

The Department of Education and the Board of Teaching are presently considering rules and regulations for coaches within the state of Minnesota. The rules, while they seem very reasonable and show a great deal of concern for the health and welfare of the youngsters who are participating in our athletic programs, they do leave at least one area of concern. My concern deals with the inability of our districts to obtain licensed coaches.

I don't know what the Department is going to do and I don't know what the Board of Teaching is going to do, but unless some exceptions are made so that we may use lay people who do not have teaching licenses, we are not going to be able to maintain athletic programs in rural Minnesota.

I can't believe this is a problem only in Albany. I think it is a problem that must be statewide and some alternatives have to be made available. In our community there aren't enough licensed teachers who are not on our staff to serve as coaches in the areas that we need assistance in. Maybe it involves licensing lay people. People who are interested in our athletic programs. People who are interested year in and year out serving the boys and girls in extra curricular programs. I see no reason why we can't license lay people or we can't use non-licensed people to assist with our coaching if the local school board is satisfied that these people meet the requirements they have established. If there is liability, the liability is going to be directed at the school district. It is not going to be directed at others. This is a practical problem. It is not a philosophical problem. It is a problem that has to be dealt with or we are not going to continue to have quality athletic programs throughout the stae of Minnesota.

Districts must have flexibility in related laws and regulations relating to coaching if we are to continue our athletic programs. The fact of the matter is, if we are going to hire coaches we are going to have to hire them some place other than from our staff. Our staff people do not want to continue coaching. Consequently, we are going to have to seek coaches elsewhere.

Sincerely,

Duane Hill

Duane Hill
Superintendent of Schools

DH:lk

COLLEGE OF ST. THOMAS
St. Paul, Minnesota 55105

DEPARTMENT OF PHYSICAL EDUCATION
HEALTH AND ATHLETICS

December 12, 1980



Dr. George Droubie
Personnel Licensing and Placement
610 Capitol Square Bldg.
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

This letter is to express my concern about the 12 quarter hour/9 semester hour maximum for the proposed coaching licensure program. I am fully aware of the valid reasons for placing a reasonable limit upon the number of credits required for such a licensure program. However, the proposed limit is simply not reasonable or practical for colleges of our type.

In essence, coaching licensure courses are selected from those normally required of physical education majors. It is not economically feasible to offer a separate program of courses for coaching licensure students, because such courses would serve only those students and, obviously, would take them out of the courses for the major students. The net result would be extraordinarily small classes in both areas. This is the reason for the economic impracticality of it. In short--more instructors required for fewer students.

Economics are not the only, nor perhaps even the primary, reason for my concern. A teacher training program can not do even an adequate job of developing the expressly desired competencies within the proposed credit hour limitations. Courses could be developed within the 9 semester hour limitation which would make reference to each competency area, but would in no way develop a real competency at a satisfactory level. Also, courses could be developed that would offer less credit for more work. This solution would tend to realize the desired competencies by, in effect, skirting the 9 semester hour limit. However, this is unfair to the students and to the instructors, who would take a dim view of teaching what is in effect a 3 or 4 semester hour course for 1 or 2 semester hours of teaching credit.

Finally, I am listing the courses and credits that now constitute our licensure program. It meets the essentials of the proposed competency areas, consists of courses which are a part of our major program, and is in my opinion in no way excessive:

(4 Sem. hrs.)	PE 402	Principles, Theory & Techniques of Athletic Coaching
(4 Sem. hrs.)	PE 410	Human Anatomy and Physiology
(2 Sem. hrs.)	PE 420	Kinesiology
(2 Sem. hrs.)	PE 421	Athletic Training Techniques
(2 Sem. hrs.)	PE 431	Exercise Physiology
(No Credit)	------	Coaching Practicum
14 Sem. Hrs.		

Having written my doctoral dissertation on the topic of the professional preparation and certification of athletic coaches, following almost two years of research, I submit that anything less than the program outlined above is not worth doing. We would only mislead students to allow them to think they are qualified to effectively meet the needs of the student athletes whom they might ultimately coach. By the same token, I don't think that a college graduate, who has completed the above program, would need to be a certified teacher. I have long been an advocate of a strong coaching preparation program that does not require teacher certification as a pre-requisite. This compromise position is not popular with most of my colleagues, but may be the only practical solution to the dilemma we face.

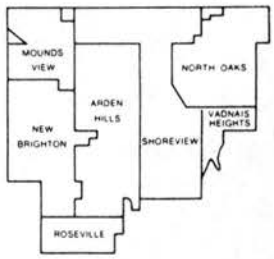
Sincerely,

Frank Mach

Frank Mach
Department Head

FM/k

Independent School District No. 621



MOUNDS VIEW PUBLIC SCHOOLS / 2959 NORTH HAMLINE AVENUE / ST. PAUL, MINNESOTA 55113 / PHONE 636-3650

DR. GEORGE A. CHRISTENSON
Acting Superintendent

December 12, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

Following are comments from Mounds View's athletic directors and their principals regarding the proposed coaching rule:

Our position is that we are in philosophical agreement with the proposed changes, including certirication of head coaches as teachers and required instruction in first aid training.

However, we believe that because we are going to be faced with a severe shortage of coaches within the next few years, the licensure requirements will create insurmountable obstacles to effective staffing of head coach positions. What seems to be needed is an escape hatch for schools faced with our problem of possibly having to assign these responsibilities under the terms of our teachers' contract. A required application to and approval from the Commissioner should provide enough impediments to preclude abuse of such a clause.

Very truly yours,

George A. Christenson
Acting Superintendent

GAC:jf

Independent School District No. 621 adheres to the principle that all persons shall have equal opportunity and access to its education facilities, activities, and employment without regard to race, creed, age, sex, handicap, or national origin.

SUPERINTENDENT OF SCHOOLS
John R. McClellan
ASSISTANT SUPERINTENDENT
Charles J. Kinn, Ed.D.
DIRECTOR OF BUSINESS AFFAIRS
Warren W. Tester
DIRECTOR OF SPECIAL SERVICES
Clifford W. Holman

Centennial Schools

Independent School District 12

P.O. Circle Pines, Minnesota 55014

784-8881

SCHOOL BOARD

Gerald A. Pehl — Chairperson
Joseph Marshall — Vice-Chairperson
Mary Cleary — Clerk
Joseph T. LaCasse — Treasurer
Harry C. Mueller — Director
Joanne Pankratz — Director

December 11, 1980



Dr. George B. Droubie, Manager
Personnel Licensing & Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

Please be informed that all of the varsity coaches and athletic directors have reviewed the new proposed coaching licensure requirements.

You should know that our coaches, athletic directors and administrators support the new coaching licensure requirements that require all head coaches to be licensed, the grand personing option and the hardship provision.

However, as in all past proposals, the proposed rules also require the coach to be a licensed teacher. The entire Centennial coaching staff, athletic and administrative personnel in our district vehemently opposed this regulation.

It seems redundant to us that a person can be fully qualified to coach, has all the proper training, particularly as it relates to athletic injuries and in addition must, for some reason, be a licensed teacher.

We can support the new regulation, if the teacher licensure requirement is removed. We would also suggest that proper coaching clinics be conducted throughout the state offering credits to people wishing to obtain additional training in first aid and athletic injury care and prevention.

Sincerely,

John R. McClellan

John R. McClellan
Superintendent

JRM:ep

cc: Richard J. Anderson, MSBA

College of Education

UNIVERSITY OF MINNESOTA
TWIN CITIES

Division of Physical Education
School of Physical Education, Recreation,
and School Health Education
Cooke Hall
1900 University Avenue S.E.
Minneapolis, Minnesota 55455

December 12, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
Division of Special Services
Minnesota State Dept. of Education
Capitol Square
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

Thank you for your memo of November 12 concerning the revised draft of the proposed licensure rule. We would like to take this opportunity to express our grave concerns about several issues raised by the proposal. Specifically:

- "Every school district shall have a licensed head varsity coach for each interscholastic sport..." (underlining ours)

  This provides recognition for the need to employ qualified (licensed) coaches, but it does not require every "school" to employ qualified personnel. In large districts (those with two or more high schools) some of the athletes will be served by qualified personnel and some may not.

- "Nothing in this rule shall prohibit a school district from employing an unlicensed person...to coach a junior high school sport."

  This policy states clearly that the hiring of "qualified" coaches is based upon the age of the athlete. We would assert that the hiring of qualified coaches must be predicated upon meeting the needs, and protecting the safety and well-being of all athletes, and not merely the older ones. In fact, the literature will reveal that junior high school students are in a developmental phase which places them at a potentially higher risk of injury than the senior high school student.

- "All candidates for licensure...shall have satisfactorily completed a program...consisting of a maximum of 12 quarter or 9 semester hours designed to provide...knowledge, skills and understandings in all of the following areas."

  The introduction of a maximum must be a landmark in Minnesota licensure rules. We view it as not only deleterious, but dangerous, because it

sets a precedence for licensing mediocre, if not incompetent, coaches. Eight content areas are included in the five classes of knowledge, skill, and understanding which means that, on the average, the body of knowledge for any given subject must be mastered within an average of 1.5 quarter credit hours. The fact that this is highly unlikely can be documented by an inspection of the general credit allocations for any college or university. It will be seen that most theory courses in professional preparation of any kind range from 3 to 5 credits. Thus, the proposed policy will produce coaches with a minimal exposure to, and at best a superficial understanding of, the essential content.

The recommended content areas do not include the ethics of coaching. We view this as a serious omission. Within the context of practices in contemporary sport, one can hardly deny the need for such understandings.

- Section F includes a provision for "grandfathering in" individuals who are or have been coaches if they can verify the completion of 6 quarter hours (60 clock hours) of instruction in first aid and prevention and care of athletic injuries.

  Such a policy suggests that 5 of the other 6 content areas (anatomy, kinesiology, exercise physiology, theory and practice of sports techniques, psychology of sport and coaching) have been mastered by experience. While we acknowledge that learning does take place through experience, we would also submit that attention should be given to the recency of exposure to the body of knowledge.

Summarily, we would draw attention to the fact that participation in athletics places the student in an environment that is characterized by more potential risk than any other component of the curriculum. An unqualified or "underprepared" coach is concurrently placed in jeopardy. We hold that, as a protection to the athlete and the coach, the state of Minnesota is clearly obligated to enact licensure rules which dictate excellence of professional preparation. We, therefore, request consideration of the following:

- <u>All</u> head coaches must be licensed.

- No restrictions should be placed upon the maximum number of credits which comprise licensure. Rather, stipulations should be made about the minimum number of credits required.

- Ethics of Coaching should be included as a requisite content area for licensure.

- Some attention should be given to a "continuing education" component as a requirement to renew certification.

Thank you for considering our suggestion. We would be pleased to answer any questions you may have.

Sincerely,

Jeralyn J. Plack, Coordinator
Professional Undergraduate Program

Mary L. Young, Head
Division of Physical Education

G. Alan Stull, Director
School of Physical Education, Recreation and School Health Education

/kp

MANKATO STATE UNIVERSITY

DEPARTMENT OF PHYSICAL EDUCATION/(507)389-6313 MANKATO, MINNESOTA 56001

12/12/80



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I would like to take the liberty to enclose some comments I sent last year to Mr. John Lunde in reference to the coaching certification proposal. I think many of these comments are still most pertinent to the new proposal being considered for coaching licensure. I wish I was made aware of the September meeting, but apparently there was some lack of communication. I do appreciate at least being able to bring forth some of the enclosed comments. I am no longer in the chair position at Mankato State but do play a significant role as a professor and curriculum committee coordinator for siginficant curriculum changes.

My major additional points would reflect my feelings related directly to the new "working draft." I have also taken the liberty to discuss some of my feelings with Dr. John Feda , Superintendent of Schools in Marshall, Minnesota and now in the highest representative position in State High School League. I feel he saw some merit in some of the thinking I attempted to convey in the document drafted 11/29/79. I would strongly question the word "Maximum" in defining the number of credits--especially in light of the subject matter they wish to be covered. This is naive on their part -and rather dictatorial and will only create more animosity in the working relationships with the universities offering such courses. Obviously, there has to be some compromise and meeting of the minds --but there also has to be some ethics and professional integrity. I think the areas are well defined -now as to how to accomplish this in the minimal number of credits becomes the issue. I think I have advocated a few ideas for thought -and I am sure many of my own colleagues would not accept them, but as I have stated --I think it has some realism with all issues facing the coaching certification problem. I think the potential of a coaching minor with many current programs (i.e., -those requiring 24-28 credits) for non-teaching individuals has some merit. Then, having a special certification package for teacher certification individuals (not sure of number -more like at least 17 qtr. credits sounds realistic --unless we go some to the weekend workshop approach) may be a realistic approach.

an equal opportunity employer

The last point I see as something that should be explored more significantly --is the whole area of competency. If the mechanics can be accomplished (and I realize this can be tremendously complex administratively speaking) --I feel sure there are many candidates who do have certain skills in the theory and practice of skill techniques area --that could possibly be waived by meeting minimal level competencies. Special exams -both performance methodology and written on set dates for certain sports --could be a reality if organized in an efficient fashion. It would have to be done well and by competent professionals, but I see merit in investigating this concept further. I would think it would be difficult to find such skills in Scientific basis area, athletic training (maybe first aid), psychologyoof coaching --but in techniques --some individuals have had experiences playing on teams, being involved in coaching through youth sport programs, dealing in assistant capacities, etc. --so I see real potential for some measure of minimal competency to be examined in the techniques and field experience areas.

Enough, thank you for your time and consideration in reading this letter and the enclosed. If it helps, then, I have accomplished my objective. Again, I am more than happy to offer my services in any manner as to helping to realistically resove this issue. It's just that as we continue "plodding along" -the women coach, technically-speaking needs nothing (I mean women's sport coach) and that is harmful. We have been leaders in this state in coaching certification, and we should continue to be the catalyst for proposing the best programs to handle the coaching issue. Thanks again for your time and effort on this delicate matter.

Sincerely,

Joe Walsh

Joe Walsh
Professor

P.S.: Obviously, I am speaking for Joe Walsh -and not stating any institutional statement for M.S.U. -although I would like to think many would be supportive of what I have attempted to convey.

MANKATO STATE UNIVERSITY

DEPARTMENT OF PHYSICAL EDUCATION/(507)389-6313 MANKATO, MINNESOTA 56001

November 28, 1979

Mr. Jon L. Lunde
Office of Hearing Examiner
1745 University Avenue
St. Paul, MN 55104

Dear Mr. Lunde:

I am taking the liberty to enclose some comments that I would appreciate your considering in your deliberation of the Coaching Certification issue for the State of Minnesota. I certainly realize the controversy associated with this volatile issue and the ramifications as to the recommendations you will make on athletics being offered in the schools.

My thoughts are based on the following background as a professional in our field. I possess the following educational background: a B.S., M.S., and Ed.D. degree from three different universities with specialization in physical education (Springfield College in Massachusetts, University of Oregon and the University of California at Berkeley), former tennis coach at the University of Minnesota for six years, former faculty member and professor of motor learning at the University of Minnesota for six years, former professor at the State University of New York at Brockport in the area of sport psychology and as tennis coach for six years, writer of scholarly articles in the area of competition, motivation, personality, coaching and other factors associated with human performance and also presenter at numerous conferences in a number of areas and asked to speak quite regularly on the area of youth sports in this society, and for the past three years, chairperson of physical education and professor at Mankato State University. I state this only to convey that I do indeed have a reasonably extensive background in this field and have been considered by many people as an authority on certain issues as they relate to sport in society. I very much wanted to attend the hearing personally but had another speaking commitment that day and couldn't attend.

I am also taking the liberty to enclose a recent article written by Sam Adams that appeared in the USSA (United States Sports Academy) News in the September-October 1979 issue. It is timely and has some import that might have some interest to you. I think it is reasonably well done and I envision only a few points that might be questionable right now. It is interesting that he constantly refers to Minnesota as somewhat of a model, but doesn't have all his facts straight. However, again his points are quite pertinent and I think have real merit to be considered. I do appreciate your taking the time to read my enclosed comments, and although they are written under some pressure and maybe could be more logically presented through oral discussion, I hope they are helpful. I

also feel that I can indeed be quite objective about the issues involved and have always considered myself to be a pragmatist at heart. In many ways, I wish that I could have a sit-down general discussion about the issue but I am sure this will have to suffice. However, if in any way I can be of any help on any matter as it relates to this issue please don't hesitate to call me at 507-389-2676. Thanks again for your time and concern.

Sincerely,

Joe Walsh

Joe Walsh, Chairperson
Department of Physical Education

JW/jb

Encl.

MANKATO STATE UNIVERSITY

DEPARTMENT OF PHYSICAL EDUCATION/(507)389-6313 MANKATO, MINNESOTA 56001

11/20/79

COMMENTS ON THE COACHING CERTIFICATION ISSUE - Dr. Joe Walsh, Chairperson and Professor of Physical Education

1. Quality coaching in women athletic programs today is in dire need to say the least. Of course, the results of Title IX have made the growth in women's athletics most significant and to keep up with such growth in the sports now available has not been easy when it comes to supplying quality coaches. However, to offer avenues to participate for women, to offer equal access to facilities, equipment, funding, scheduling, etc. and not offer quality coaching at least equal to the men is highly questionable in logic and to meeting the intent of Title IX. It actually is even bordering on discrimination when we face the fact that the quality of coaching we now have in the men's programs over the past number of years is certainly superior in the majority of programs being offered today in this state (although even there it is questionable; however there has been at least a requirement--9 credits?? Is something better than nothing? As you know, to coach in women's athletic programs, nothing is required.). It is very much the exception to find a more qualified person coaching in the women's sports programs today. So, in summary, to offer all the avenues of equality and to attempt to comply with the intent of Title IX, except to not offer quality or attempt to upgrade the qualifications necessary in coaching women, is philosophically questionable and unethical. This will indeed continue to happen if we require nothing. Something is better than nothing. (we still in fact - at least at present - require nothing - on the current books) -

2. Should all head coaches be certified teachers? Sure, if we don't wish to be realists. I can see little sense arguing that coaches should be certified teachers. I think most professional and prudent people would agree that the chances are that you will have a more quality product coaching. However, we must deal with reality of where we are in today's society, the growth patterns of athletics, the significant number of vacancies in coaching, etc. These are facts and we must deal with such facts. So, my major concern is not whether they are certified teachers, but what are the competencies that those paraprofessionals are able to bring to the situations? I can document at the college levels, numerous role models in the coaching field who have done excellent jobs in our profession and have never been certified as a teacher with a Bachelor's degree. Many have come from other domains. Sure, ideally, education (and coaching athletes deals with the gifted student in the physical domain of education) should be in the hands of the educational people, qualified certified teachers. However, one should not state unequivocally that quality coaching can't be done by people who aren't certified teachers. It can and is being done all over this country and with excellent examples of quality. The answer is competency, coaching candidates should be able to definitely demonstrate at least minimal levels of competency in defined areas. Do they understand the physiological and psychological components of the

human in performance settings? Do they understand some of the growth patterns of youth? Do they have an understanding of risk, injury, liability, etc. as it relates to the coaching environment? Do they indeed have the necessary techniques of coaching? I don't think it can be documented that a certified teacher is the only individual able to understand this. Perhaps, we can offer special programs--minors in coaching at colleges for the non-teaching person in liberal arts, business, community health, corrections, etc. I would feel quite confident that if a student from across campus with no educational intentions of teacher certification enrolled in our coaching certification offering here on campus that they indeed would be quite well qualified. So, I see other avenues on this route. I don't see teacher certification courses as any panacea for coaching quality. (I'm not sure I see it as a panacea for even the teaching profession.)

3. Liability: The comments in the enclosed article by Adams are most pertinent here. I do feel I understand some of this area by certain experiences I have had in being called as a professional in our field to testify or give professional input on matters. There also are two books, Physical Education and the Law (1978) and Athletics and the Law (1975) by Herb Appenzeller, that may be of interest to you. At any rate, in all my experiences and dealing with this area, there is one statement that apparently continues to come forth when final rulings are made on liability issues: "Did they (party being sued) show prudent concern?" This is an interesting statement when we attempt to look at the precautions coaches, administrators, school districts, etc. followed in the hiring process of a teacher, coach, etc. I must be honest, if I was asked as a professional person in our field to testify in a liability case as to whether the coach or administrator involved showed this prudent concern, I sure as hell would want to know their background. Was the coach qualified to coach? Did he or she attempt to meet basic minimum requirements as to meeting identifiable competencies we would associate with the coaching domain? I am not sure in good conscience that, if we don't at least meet the intent of the proposal brought forth by the Board of Teaching (which I even consider questionable in being able to accomplish competency in 12 quarter credits--although--again, I am a realist and understand we have to be reasonable and compromising at the college level in trying to meet this) that I could testify that prudent concern was shown by the administration that allowed that individual to deal with the sport setting as a coach in the educational confines of the institution. Ironically, the reality on this whole coaching issue is not going to come down to whether or not sports will be cut or whether we can continue to offer sports if we have a requirement, but the stark reality of those administrators screaming for almost nothing (and make no mistake that is exactly what many are screaming for -- "nothing") will come to an abrupt halt when that inevitable law suit over an injury, improper conditioning techniques, inadequate coaching preparation, etc. is the result. And, an investigation reveals the coach involved had no training or lacked minimal competencies in his/her background. Then what? Is that what we are to sit back and wait for? Is that what the ultimate test will be? If our entire reasoning process is based on reality of whether we offer programs or not, and not to morally and ethically look down the road, then I guess I have to ethically, morally and educationally question that logic. I guess I have to also ultimately question this term "realist" when we take it to such an extreme. What do we really mean when we say "let's be realistic?" Are we willing to go that far and be realistic about the ultimate impact on injury to the athlete and liability to our profession down the road? I sure as hell hope so for our own survival. To deny

that we don't have to deal with this issue eventually is to be living in a dream world that will be a shattering experience at some point in time.

4. Pre-junior high athletics: The growth in this area has been tremendous and it has been documented that there are now over 31 million kids involved in organized youth sport programs in this country today. Most are out of school programs, and the quality of the program depends greatly on the quality of adult-intervention. We have tried to put out some research teams into communities to offer services in this area not only in technical aspects of coaching but issues dealing with physiological, psychological and philosophical matter as they pertain to youth, sport, competition and society. I am not sure that our priorities at times aren't totally "screwed up" in that the place where we often find the most unprepared coaches is at this level. During a period of significant growth and developmental changes at this stage, it would seem to make sense that this is where we should indeed have the most prepared coach. Of course, whether we should have the degree of competition we see at pre-junior high school level is questionable in the first place. Maybe we should seriously reevaluate that issue. It doesn't negate the fact that at this level you need the best qualified person to deal with the many changes. At high school, most youth have already gone through many of the developmental changes, have experienced the athletic process, competition, etc. and are more able to cope. To say the best prepared coach should be at the high school level might be erroneous.

The best work done now in Youth Sport is the STATE of MICH. and MICH. STATE - MICH. has a large grant studying the IMPACT Here

5. Some suggestions as to what can be done:

A. Mankato State offers a coaching certification requirement that we philosophically support as a faculty and that we believe is right. However, again coming back to reality, we must move that current program we have into a coaching minor for the person really committed to move more seriously into athletics. I also view this as a viable option for the non-teaching major student who wants to do some coaching but not go the certification route. As I have stated before, I have no real problem with this because I feel such individuals would indeed meet minimal levels of competency and still be educationally sound. Of course, my colleagues in the Colleges of Education might not support this thinking and I would think William Gardner's comments from UM at the hearing would be their byword. As much as I can support his thinking, I don't see it entirely as the answer. At any rate, we will most likely move our program into a minor.

B. Offer a number of one credit weekend workshops. We at Mankato, have done this already in the past two summers and the workshops have been very well received in the coaching theory area, first aid-athletic training domain, psychology of coaching and scientific basis area. Some competency areas are well geared to this approach but some of the work in the science area doesn't always offer such attractive possibilities. I envision the weekend workshops as being offered through several approaches both on and off-campus. Some examples: two weeks ago we offered an officiating workshop that went from 7 to 10 PM on Friday evening and all day Saturday for one quarter credit. We enrolled 17 students. We usually draw anywhere from 20 to 50 students for our summer weekend workshops in coaching theory. In the summer of 1978 I offered a Psychology of Coaching workshop and had about 50 students. December 1st we will have over 50 for a track and field workshop. So, it can be done; maybe not in the manner that we would professionally

desire, but if reality is to be considered this may be an answer.

C. I also envision that we could put out research/teaching teams-- co-institutional (not just one university)-- and that services could be offered in select central locations throughout the state in a mass effort to offer some weekend workshops. One team may deal with just coaching theory, another with the scientific area, another with psychology of coaching and another first aid and athletic training and then rotate to three defined spots at certain time periods in the year. Of course, the funding for professional services would be necessary for their weekend efforts. Perhaps there is grant money available (or districts could play a funding role here) for such an approach. I see real potential in this venture, certainly it seems worthwhile to pursue prior to taking rash measures of no certification requirements. We could offer it for a three year period with a certain number of defined offerings. Allow coaches a probationary period to get certified. If superintendents refused to support such a plan, then I would question their educational concern about this entire issue. I say it can be done, but it needs coordination and Mankato State has already offered a model proving it can be done. I also envision the possibility of competency testing as a reality that should be planned for and dealt with. Certain individuals by the nature of their prior experience may already possess a reasonable expertise in coaching theory (i.e. tennis professionals, golf professionals, etc.) and to require them to have the same background as a novice as to required coursework in coaching theory is questionable. Competency testing by professionals in our field could facilitate this issue. It is complex and administratively can be a problem but it does offer some potential. If one meets defined minimal levels of competency then that should do it.

In summary, I see things that can be done, but it requires planning, institutional cooperation, a waiver of where such research and teaching teams could go to offer services as to institutional boundaries associated with off-campus offerings, and support by the superintendents of schools. Of course, in many cases it also requires some funding for the services of the people. These are viable options that I envision as realistic. Mankato State's Department of Physical Education will continue to offer as many viable options as possible as long as we can philosophically and educationally support our position. Thanks for your time. I'm not sure how these comments will be viewed, but I hope they are helpful.

"Known Around the World as America's National Institute of Sport"

USSA NEWS

Sept/Oct 1979 Vol 3 No. 4

Coaching Certification: The Time is Now

Samuel Adams, Ed.D.

A member of the Sports Academy's national faculty, Adams directs the Masters in Sports Administration program at Washington State University and also directs the WSU Summer Sports Skills Camp. He played professional football for five years and has also served as head football coach at Whitworth College and assistant football coach at W.S.U.

Requiring certification of all interscholastic athletic coaches would be a major step forward for the coaching profession and interscholastic school sports. If sports are educational, it is logical that specific criteria be established for high school coaches just as there are special requirements for other special areas of education — driver's education, vocational education, counseling, speech therapy, and special education.

In 1972 Dr. Wayne McKinney stated at a meeting of the Division of Men's Athletics, a division of the American Alliance of Health, Physical Education and Recreation (AAHPER) that, "Some secondary school administrators have taken the attitude that 'anyone can coach, because kids will play!' " He goes on to say, "This is one old and illogical reason that antiquated or nonexistent professional standards for coaches are found in most states." Since 1972 the standards, nonexistent or antiquated, have degenerated. Today in education it is possible for anyone who raises a hand in a faculty meeting to become a coach.

Many different factors have arisen since the late 1960's that point to a need for certification of coaches.

Historically, even before Title IX there was an increase in sports in the public secondary schools. There has been an increase in the number of participants as well as an increase in the levels of competition. The Athletic Education Record pointed out the increase in girls' sports in Minnesota prior to Title IX. In Minnesota the number of girls' interscholastic teams increased in the period from 1971-72 to 1975-76 in impressive proportions.

See the center blue section of this newsletter for full information on the Sports Academy's international certification programs in management, medicine and coaching.

The growth trend in girls' sports in Minnesota is an indication of what has happened nationally. While boys' sports have not had the tremendous growth that girls' sports have, it has had a steady growth pattern. The steady growth in boys' sports is indicated by the Washington Interscholastic Activities Association's survey of sports participation. In 1973-74 there were 73,084 individual boys participating in sports. In 1977-78 there were 73,884 individual boys participating. While this is not a spectacular growth pattern, it is significant because there has been a steady decline in enrollment in schools in the state.

The effect of Title IX is being felt by all school districts in their sports program. Participation by girls in interscholastic sports has spiralled since 1975. In the State of Washington the number of girl participants in sports in 1973-74 was 29,669. In 1977-78 it grew to 40,114. This has placed a heavy demand on school districts to hire more coaches for girls' sports. Lesch has pointed out, "That the success or failure of the girls' sports program rests largely with the coach. Many of these women teachers have little or no background in competitive athletics and perhaps are only able to perform skills at an acceptable level. Additional help is needed if a successful program is to be realized." He states further, "Girls involved in interscholastic athletics shouldn't be held under their potential because the coach lacks in the area of knowledge and experience. We must help both athlete and coaches reach their potential." The need for more qualified coaches that had been accentuated by more participation by both boys and girls in sports in secondary schools since the late 1960's became acute with Title IX.

Administrators of secondary schools had historically relied upon physical educators to handle the coaching responsibilities. The problem inherent in the increase in participation in sports is the lack of teaching positions related

to coaching positions. For example, in a typical high school of 1,000 students there are approximately 20-25 coaching jobs for 10 boys' sports. In this same school there are usually two to three fulltime men physical education and health education teachers. Even with each man coaching three sports, only nine of the 20 positions are filled. Personnel from other teaching and district positions have had to be utilized, many of them without any form of professional training. This same staffing problem is now facing girls' sports. Therefore, there is a dire need for professional training for coaching personnel from the other areas of education. Following the 1972 Olympic Games the United States Sports Academy sent out a series of surveys in an attempt to evaluate the credentials of people in coaching. Results indicated that over 70% of the coaches in schools don't have a physical education major; over 65% don't even have a P.E. minor; and over 50% have never competed in sports themselves.

Administrators once welcomed the use of other district personnel as most districts or states have rules or laws stating that all coaches must be employed at least half-time by the district and be a certified teacher. Two problems have arisen which now have made administrators look hard at the use of untrained personnel. First, Maetozo and Leibee have pointed out the severe legal implications facing a non-qualified athletic coach. Liebee says, "A fool is liable for his folly even though he did the best he knew how." "One is ignorant in any field at his own peril. If one is not qualified to act within a specific field, he should not attempt to do so. If he cannot meet the standard of care required for teaching gymnastics, he should not teach gymnastics; if he cannot meet the standard of care for coaching a sport, he should not attempt to coach that sport; if he cannot meet the standard of care required for playground supervisors, he should not accept such a position. The question as to whether or not the required standard of care has been met is one for the judge and/or jury to determine. If an administrator assigns unqualified personnel to conduct an activity, the administrator may be held liable." Standard of care refers to duty to conform to a standard of behavior which will not subject others to an unreasonable risk of injury. Both untrained and usually unqualified coaches and administrators are aware of their potential negligence and liability due to no professional coaching training and are less willing to assign or take assignments in which they may be liable.

As the public has become more aware of the legal responsibilities of the school district and personnel, the school's administrators have become more selective in hiring practices.

The second problem that is facing school administrators today is the accountability factor. All school programs, practices and personnel are now under scrutiny of the public and assessment in education has been

USSA Distinguished Service Awards

The Sports Academy has announced the 1979 recipients of the distinguished service awards for noteworthy contributions to international sport education. Chosen annually by the Academy's board of directors and board of visitors, the recipients are selected for their significant and continuing contributions to international sport and sport education.

The 1979 recipients are:

H.R.H. Shaikh Hamed bin Isa Al-Khalifa, Crown Prince, and President of the Supreme Council for Youth and Sports, State of Bahrain, for his contributions in the development of the Bahrain Sport Institute and the Middle East Sport Research Center, both designed to assist the nations of the Middle East, particularly the Arabian Gulf nations, in sport education, research and service.

Felipe Monserrat, Republic of the Philippines, for his contributions to Philippine amateur sports as past president of the Philippine Olympic Committee and Philippine Amateur Athletic Federation, and his responsibility for founding and developing the National College of Physical Education and Master of Sport Science program.

James Platt, London, England, chairman of the Center for International Sports Studies, and also director of the Central Bureau for Educational Visits and Exchange, who has made major contributions in sport, physical education, recreation and youth services internationally.

Malvin Whitfield, United States, a two-time gold medalist in the Olympics and who has served for more than 20 years in sport education programs in Africa with the United States Department of State.

Guillermo Lopez Portillo, Republic of Mexico, who is responsible for the development of the Mexican National Institute of Sport, which is the host organization for the 1979 World University Games in Mexico City.

thrust into the foreground. The public is demanding an accountability of how the tax dollars are being spent in education. Initiative 13 has quickly focused for educational leaders the reality of accountability. Programs must be assessed and defended upon their productivity not only within themselves but in competition with other educational programs within the school system. While this is not a desirable situation nor conducive to quality education, it is a present day reality. Personnel within such programs are vital and qualified professional people are sorely needed.

Another area of concern for school administrators that is becoming prevalent today is the use of paraprofessionals and lay personnel in coaching. Examples of this are such items as a recent advertising of a high school in Minneapolis/St. Paul for 19 men and women coaches from outside the school system. In a Northwestern state there is a small rural school that has a local farmer as its head football coach and a fireman as its head basketball coach. Both of these men are certified to teach, but are not presently teaching in the school district.

In 1976 an educational committee was charged by the Kansas Legislature with studying a bill which would make it legal for anyone to coach, regardless of educational background. The bill's sponsor argued that this would allow local people (farmers, lawyers, etc.) with athletic backgrounds to coach. After a survey was sent out to all 50 states, Puerto Rico, and Washington, D.C., and hearings were held by the committee, the House bill was rejected. However, a request to study a plan calling for the certification of coaches in Kansas was requested. Many school districts are now using laypersons as assistant coaches in several sports. As this trend of using Auxiliary personnel continues to grow, there must be a means provided that will assure the competency of such personnel.

Sports are included in the educational curriculum on the basis of their contribution to educational goals and values. These goals and values are best derived from sports by qualified and trained professionals. Alley speaks of athletics as a two-edged sword that can be used as the coach desires — good or bad. Havel and Seymour state, "Sound objectives are achieved only when the program is controlled and planned by professionally prepared leaders."

There is a great need for coaching certification. The evidence that coaching certification would upgrade coaching is overwhelming. Veller points out that preparing and keeping the right kind of people in public school coaching is a great responsibility, but it must be accomplished.

What are the implications for coaching? It seems that there is a definite need for certification of coaching. Coaching is a specialized area of education. It is an area that must be regarded as an entity in itself. It is different although similar with some basic qualities and characteristics of physical education. Being a good physical educator doesn't assure one of being a good coach. There are specialized knowledges needed for coaching expertise; in sports medicine, sports psychology, sports technique, sports administration, sports physiology, public relations, sports facilities and equipment, and sports problems that include law and liability and assessment of personnel and programs. A curriculum which includes these areas can be assimilated into a coaching major or minor and certification. Many colleges do, in fact, have coaching minors which is helping to train non-physical education majors for coaching. Esslinger , Maetogo , Adams , Meinhardt , and others have proposed programs and ideas for the preparation of coaches. Any plan must include the above areas and include a means of certifying the coaches that are presently coaching in the public schools. It may also include ongoing or in-service training for paraprofessionals and laypersons. However, the task is not the formulation of a certification program but realization that it is needed now. Only a few states have moved into certification. In 1976 45 states, Puerto Rico, and the District of Columbia had no specific certification requirements for coaching; however, most of them require that a coach be a certified teacher. Only six states have minimum certification requirements for coaching in addition to teachers certification. These states are Minnesota, Nebraska, Iowa, Wyoming, Pennsylvania, and South Dakota. Only three of these states, Iowa, Nebraska, and Minnesota have additional coaching certification requirements for physical education majors. All of these coaching certification programs are subminimum with the exception, perhaps, of the requirement for women coaches in Minnesota, which could be considered minimum. None reach the criteria suggested by AAHPER in 1971.

Call for Papers

A general call for papers has been issued for the annual R. Tait McKenzie Symposium on Sport, designed to foster interdisciplinary research and scholarship concerning sport from the perspective of the humanities. Contact Dr. William J. Morgan, Div. of P.E., University of Tennessee, Knoxville, TN 37916.

association of metropolitan school districts

December 12, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Mn. 55101

Dear Dr. Droubie:

On behalf of the Board of Directors of the Association of Metropolitan School Districts, I appreciate the opportunity to comment on the revised draft of a proposed coaching licensure rule prior to its consideration by the State Board of Education.

As you may recall from the September 12, 1980, meeting at which time our organization, amongst others, was asked to react to and provide input relative to the proposed rule, I raised the question as to need for a coaching licensure rule. While you indicated that a "statement of need" had not yet been drafted, I had anticipated that such a statement would, in fact, accompany the revised draft to which you are now seeking response. As I indicated on September 12, 1980, our organization seriously questions the need for special and detailed licensure requirements for head varsity coach. If the purpose of the proposed licensure requirements is to improve the quality of the interscholastic athletic program through setting quality standards for coaches, why does licensure concentrate only on the athletic phase of the student activity program and not take into consideration such areas as debate, forensics, drama, publications, etc.? The philosophic base for singling this particular extra curricular activity out for licensure is not clear, and because of the proposed licensure provision which would require that any person hired as a head varsity coach must hold a current, valid Minnesota teaching license, it might well be argued that the rules do more to protect teacher rights and positions than to promote an educational program for students.

If the purpose of the proposed rules is to quarantee to the public that there are some standards for interscholastic athletics, such licensure requirements should be minimal and allow local school districts the authority and accountability for selecting and securing the most qualified individuals available and willing to serve. It will be a much greater disservice to students and to educational programs to have school districts reduce interscholastic athletic opportunities because they cannot secure licensed coaches than to have persons who are accountable by the jobs that they do, rather than the licensure they hold.

Implicit in AMSD's concern relative to the comments above is the proposed requirement that a head varsity coach must in all cases be a licensed teacher; that no provision is made in the rules, as drafted, for an exemption to that requirement in the event

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that a local district is unable to locate and secure the coaching services of a qualified teacher holding a current, valid teaching license. Declining enrollment, suburban districts with aging and highly trained and experienced staffs are finding it increasingly difficult, and, in a growing number of cases, impossible, to secure needed coaches from the teaching ranks. The appropriate expansion of varsity interscholastic athletics to provide equal opportunities for girls has exascerbated the dilemma. Unless allowances for exceptions to the proposed coaching licensure requirement that all head varsity coaches be a licensed teacher are provided for, a reduction of student opportunities in interscholastic athletic programs will result in many districts rather than quaranteeing a program of high quality.

The 23 member districts of the Association of Metropolitan School Districts would strongly urge that coaching rules, if proposed, include some provision for exceptions to the licensure requirements such that interscholastic sport opportunities for students need not be eliminated in the event that a licensed teacher with the necessary coaching qualifications and experience can not be secured.

Thank you for your consideration.

Sincerely,

Mary Roberts

Mary Anderson Robert
Executive Secretary

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December 12, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minn. 55101

RE: 5 MCAR Head varsity coaches interscholastic sports in senior high schools.

Dear Dr. Droubie:

After a review of the above propsoal on license for coaches by the school staff, only one difficulty appears likely. Under D. 5. "Satisfactory completion of a supervised field experience in coaching consisting of no fewer that 40 clock hours." In small high schools, it is often necessary to hire head coaches who have just graduated from college. They may not have had the opportunity to have experienced field experience in coaching.

Thank you for your consideration.

Sincerely,

Donald J. Huesers

Donald J. Huesers
Superintendent

DJH/is

cc: Richard J. Anderson

concordia college moorhead, minnesota 56560

DEPARTMENT OF
HEALTH, PHYSICAL EDUCATION AND ATHLETICS
(218) 299-4434

December 11, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

We would like to register two concerns regarding the working draft on requirements for coaching certification in Minnesota.

1) the four areas of courses recommended is good, but the maximum of nine semester hours would require us to revise our courses in such a way that we would have a course in the science of sports for coaching certification different than the same course for our physical education majors. This is unrealistic for smaller programs such as ours. We would ask that you have a range, say eight semester hours as a minimum and ten semester hours as a maximum. This would give the individual school some flexibility in their program development.

2) your number five on a field experience is difficult for the athlete competing in two or more sports. We think you should consider varsity experience for a certain number of years as satisfactory in meeting that requirement.

Please consider these questions in your deliberations.

Sincerely,

Armin Pipho

Armin Pipho, Chairman
Physical Education
and Health

AP/dw

VERNON G. LUETH
SUPERINTENDENT

GLENDON L. LAKES
HIGH SCHOOL PRINCIPAL

VICTOR F. RINKE
ELEMENTARY PRINCIPAL

INDEPENDENT SCHOOL DISTRICT NO. 117 • CASS-CROW WING COUNTIES

Pine River
PUBLIC SCHOOLS

PINE RIVER, MINNESOTA • 56474



December 12, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

RE: Licensure for Coaches

We have reviewed the proposed rules for licensure of head varsity coaches of interscholastic sports and find them to be reasonable in most respects. We do have serious concern about provision H.3.

If a district qualifies as a hardship situation and must employ a person not properly licensed to be a head coach we can foresee problems with the H.3 portion of the rules. Many people would accept taking a head coaching position on a short term basis (one or two years) to help a district out but we don't believe many would even consider it if they had to be enrolled in an approved program leading to licensure. They would take the position that such a demand is beyond the call of duty and would refuse the assignment. In effect H.3 would negate the intent of the hardship provision to a great extent.

Sincerely,

Vernon G. Lueth, Superintendent

BOARD OF EDUCATION

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MANKATO STATE UNIVERSITY

DEPARTMENT OF PHYSICAL EDUCATION/(507)389-6313 MANKATO, MINNESOTA 56001

December 11, 1980



Dr. George Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

I am responding to your memo of November 13 regarding the proposed coaching licensure rule.

We are all aware of the length of time it has been since coaching licensure in Minnesota has been a rule. It is appalling that we are still in the structure stages. This latest proposal does not seem to solve any of the organizational problems we've experienced to date.

First let me respond to item C. (Scope) on page one of the working draft. I see no difference between a head coach and assistant coach insofar as duties are concerned. Perhaps the "Head" coach has additional administrative duties, but in my estimation all coaches teach and therefore should be responsible for his or her educational background. All potential coaches should aspire toward certification.

Concerning item D. (Qualifications for Licensure) the stipulation of: "a maximum of 12 quarter hours or 9 semester hours", relative to the academic areas listed, is not sound. I know of no institution of higher learning in Minnesota which can justifiably teach a student in these areas in that amount of time. This portion of the proposal is not educationally responsible.

My reaction to any alternative route to licensure as stated in item E. is simply to say that "education is an opportunity, not something for sale". Alternatives, such as listed here, would create a political fiasco between colleges and universities and give birth to "watered down" curriculum.

Overall, this current Proposed Coaching Licensure Rule is the weakest I have seen to date. I am in full realization of the difficulties encountered these past many years in putting together a certification program. I am also aware of the vast turnover of coaching positions in today's school systems and I sympathize with administrators who have to satisfy those positions. It is also apparent that all colleges and universities need to relook at their coaching certification programs. I feel some requirements could be pared down. This type of action would necessitate total representation and I am not certain a hearing is the answer, although maybe a good starting point.

If time does not permit additional input meetings or hearings to be held, I would hope that the Board of Education rejects this latest proposal. Thank you.

Sincerely yours,

Jack Amann

Jack Amann, Chairperson
Department of Physical Education
P.O. Box 28

JA/jb

INDEPENDENT SCHOOL DISTRICT NO. 194

8670 210TH STREET WEST
LAKEVILLE, MINNESOTA 55044
(612) 469-4461

SUPERINTENDENT — DONALD J. MCGUIRE
ASSISTANT SUPERINTENDENT — WALDO D. LARSON
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December 11, 1980

Dr. George B. Droubie, Mgr.
Personnel Licensing & Placement
610 Capital Square Bldg.
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

The proposed draft regarding licensing of coaches has been reviewed and discussed by members of our staff. We are in support of the proposal in existing form, and respectfully request the adoption of the proposal by the State Board of Education.

Sincerely,

Donald J. McGuire
Superintendent

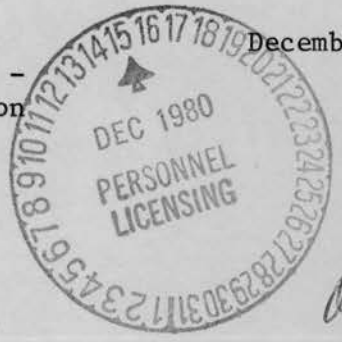
DJM:vm

"EQUAL OPPORTUNITY EMPLOYER"

Ken

saint Paul public schools
COMO PARK ELEMENTARY SCHOOL
SPECIAL PROGRAMS UNIT
780 WEST WHEELOCK PARKWAY SAINT PAUL, MINNESOTA 55117 TELEPHONE (612) 489-8035

Dr. George Droubie
Personnel Licensing and Placement -
Special Services Division
Minnesota State Dept of Education
Capitol Square
550 Cedar Street
St. Paul, Minn. 55101



December 10, 1980

B.O.T. will have adoptive P.E. rule

Dear Dr. Droubie:

We are writing in regard to the licensure standards that are presently under consideration. As in the past, we are acutely aware that no specific allowance has been made in the area of the multi-handicapped with vision and hearing impairment emphasis.

Although this is a low incidence population, the numbers of students requiring educational programs are increasing. Also, those of us who have been specifically trained feel the need and right to be recognized with appropriate licensure. Presently, due to the fact that it is difficult to place us categorically, there is no licensure that reflects our training and specialization.

It is our contention that we need to be identified as a separate field. It is not adequate to take the technology from the individual fields of vision and hearing, combine them and expect to have a qualified teacher of the multiply handicapped. Our course work refects intensive training in all functioning levels, age ranges, disability areas and practicum experiences. In addition to classes such as: Learning Disabilities, Physically Handicapping Conditions, Emotional and Behavioral Disorders and Mental Retardation, the core of our teacher preparation program emphasized vision and hearing impairments. We would be more than happy to provide course outlines and personal transcripts, if you so desire.

Our recommendation to you and the State Board of Teaching would be to establish a specific licensure for "Multiply Handicapped-Vision/Hearing Impaired." It is our feeling that only a specific license will reflect the in-depth training we have received.

Although there are presently only three of us in this state who have this special training, other states such as Colorado have set the precedent for this licensure. We are also aware that it is difficult to recruit and retain teachers because it is impossible to obtain appropriate licensure.

We do hope you will give our concerns your full attention. Thank you for your time--we would appreciate a reply.

Sincerely,

Paula Cornelius . Debra Gourley Young Rosemarie Biagi McQuillan

Paula Cornelius Debra Gourley Young Rosemarie B. McQuillan

Bemidji State University BEMIDJI, MINNESOTA 56601

DEPARTMENT OF
PHYSICAL EDUCATION AND RECREATION
218-755-2940

December 9, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
Division of Special Services
Minnesota Department of Education
Capitol Square, 550 Cedar St.
St. Paul, MN 55101



Dear Dr. Droubie:

Subject: Proposed Coaching Licensure Rule

I have reviewed the working draft and the following comments relate to the working draft date November, 1980.

Part D Qualifications for Licensure

1. The knowledge, skills, and understandings of the various areas indicated are excellent.

2. It is impossible to develop a program with the needed knowledge, skills, and understandings within the 12 quarter or 9 semester hour maximum. A quality program would need approximately 25 quarter hours.

The question of legal liability in inadequately prepared coaches should be of concern to school districts, teacher preparation institutions, and the State Department of Education.

I strongly urge the removal of the maximum limitation and recommend the rewording with a minimum of 20 quarter hours for a head coaching position. Recommend a minimum of 10 quarter hours for all assistants.

Sincerely,

Charles Edgington

Charles Edgington, Chairperson
Physical Education and Recreation

CE:vm

"An Equal Opportunity Employer"

UNIVERSITY OF MINNESOTA
DULUTH

College of Education

Department of Health and Physical Education
and Recreation
190 Physical Education Building
Duluth, Minnesota 55812

(218) 726-7120

December 10, 1980

Memo to: Dr. George B. Droubie
Personnel Licensing & Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55071



From: Dr. Edmond F. Lundstrom EFL
Acting Department Head
Department of Health, Physical
Education and Recreation
University of Minnesota, Duluth
Duluth, MN 55812

Subject: Proposed Coaching Licensure Rule

We were pleased to be informed that now revised licensure rules for interscholastic coaches are being finalized. However, we are concerned with the working draft of these licensure rules. Our major concerns include:

I. Head coaches in Junior high school interscholastic sports are not included in the proposed licensure rule.

II. A maximum of twelve credit hours is unrealistically low to achieve knowledge, skills and understandings in the five areas listed in the draft under D. At present we require 38 credit hours for the Coaching Certification.

III. The ability of previously employed coaches, regardless of their absence from coaching to be granted licensure after the completion of six quarter hours of first aid and prevention care of injuries. This is totally inadequate for a field which is changing and new updated material is continually forthcoming.

It is hoped that the above concerns will be taken into consideration and these areas of the proposed rules modified.

EL/t

MELVIN GILSTAD
Chairman
Blackduck

ORVILLE OLSON
Treasurer
Blackduck

ALVIN BONTRAGER
Clerk
Hines

PAUL NESTBERG
Director
Blackduck

ROBERT HOLMGREN
Director
Tenstrike

FRANK YERBICH
Director
Puposky

Independent School District No. 32

Telephone (218) 835-4214

BLACKDUCK, MINNESOTA 56630

GENE KJELLBERG — SUPERINTENDENT

December 10,1980

Dear Mr. Droubie:

We at Blackduck have reviewed the coaching rule as proposed by the Division of Special Services.

We find that it is an excellent proposal and should meet the needs in this area very well. We unanimously recommend its approval.

Sincerely,

Gene Kjellberg

Gene Kjellberg
Superintendent



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MINNESOTA STATE HIGH SCHOOL
COACHES ASSOCIATION FOR GIRLS SPORTS, INC.

P.O. Box 20335, Bloomington, Mn. 55420

PAST PRESIDENT
Ardis Knudsen
Columbia Heights H.S.

EXECUTIVE SECRETARY
Vel Teichroew
Richfield H.S.



December 10, 1980

George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

On the whole, the Minnesota State High School Coaches Association for Girls Sports supports the proposed rules contained in the November, 1980, draft developed by your department.

With the increased demand for coaches at all levels, and the limited supply of coaches, we are pleased to see the rules developed for the head varsity coach only. The "grandparent clause" provides for the majority of present head varsity coaches to qualify for immediate licensure.

The one concern of our organization is the limited number of female head coaches. We feel it is very important that our young women have female role models, particularly in an area such as athletics which has been so heavily dominated by males in the past. Presently, the majority of women qualified to coach are young but unable to acquire teaching positions. Thus, many do not pursue their teaching certification. As an alternative to the proposed licensure requirements, we would like to suggest that a varsity head coach be in possession of a bachelor's degree from an accredited institution and a coaching certificate. The coaching certificate would include all items listed under part (D), qualifications for licensure.

The Coaches Association for Girls Sports appreciates the work that has been done to make the coaching licensure concise and responsive to concerned groups.

Sincerely yours,

Judy Johnson

Minnetonka Public Schools

DALE R. RUSCH
DIRECTOR OF SECONDARY EDUCATION
ADMINISTRATIVE OFFICE
261 SCHOOL AVENUE
EXCELSIOR, MINNESOTA 55331
Phone 612-474-5401

December 10, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

Re: Draft of a proposed coaching licensing rule

In reviewing the proposed rules on coaching licensure, there appears to me to be a contingency which is not addressed. The school district hardship situation does not give an escape clause if a licensed teacher is not available to coach a sport or if licensed teachers are unwilling to coach or are totally lacking in expertise in a sport.

It is not difficult to predict this situation in the near future. Already our district cannot fill all coaching positions with licensed teachers. We have filled all head sports at the high school with licensed teachers, but it's been very difficult, and the situation is becoming increasingly more difficult. To add more stringent rules may make it impossible. The student enrollment decline is causing a cut-back in number of teachers. With lay-offs determined by seniority and few open positions, there is a scant number of younger teachers available who do much of the coaching. I anticipate not having a licensed teacher available to fill a head coaching position. What option is available when this happens? It appears that dropping a sport or being in violation of the rules are the only options.

I suggest a provision be included in the school district hardship situation making it permissible to hire a non-licensed person when a licensed teacher is not available.

Additionally, Section H as presently proposed may force a district to hire a licensed teacher as a coach just because he/she is a teacher. Whether he/she is interested or has expertise in a sport may not be a factor. Being a licensed teacher does not automatically make a person better able to work with young people than a non-teacher with interest and expertise.

I do not feel the rules as proposed will always serve the best interests of young people interested in athletic opportunities. The rules may force school districts to drop activities or hire coaches not enthusiastically interested in the sport. I hope you will consider my suggestions.

Sincerely,

Dale R. Rusch

Dale R. Rusch, Ph. D.
Director of Secondary Education
Minnetonka Public Schools

DRR/jn

Litchfield Public Schools
INDEPENDENT SCHOOL DISTRICT NO. 465
901 GILMAN AVENUE NORTH
LITCHFIELD, MINNESOTA 55355

DISTRICT OFFICE SENIOR HIGH SCHOOL
RICHARD J. RIGG, SUPT. (612) 693-2444
ARNOLD DUFSETH, BUS. MGR. (612) 693-2444
SENIOR HIGH SCHOOL
DENNIS LOKKEN, PRINCIPAL (612) 693-2424

JUNIOR HIGH SCHOOL
JOHN OZBUN, PRINCIPAL (612) 693-2441
LAKE RIPLEY ELEMENTARY
JACK RALSTON, ELEM. DIRECTOR (612) 693-2436
WAGNER ELEMENTARY
LEO PLUT, PRINCIPAL (612) 693-2824

December 11, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

This communique is in response to the proposed rule for the licensing of coaches which is to soon be brought to the State Board of Education.

I am in agreement with Parts A through G and Part I of the proposal. Part F could be difficult in cases where the coaching experience is limited and perhaps not satisfactory.

Part H of the proposal is good but not that portion that deals with teacher licensure. Our district could be without an assistant hockey coach, an assistant wrestling coach and a head boys' swim coach if teacher licensure would be required. In outlying districts, there just aren't as many qualified persons available when older coaches stop coaching. While I support the spirit and philosophy of requiring licensure as a teacher in Part H, it is just not realistic and that portion should therefore be eliminated.

Sincerely,

Richard J. Rigg
Superintendent of Schools

RJR/kc

cc: Richard J. Anderson
Minnesota School Board Association

INDEPENDENT SCHOOL DISTRICT NO. 624

White Bear Lake Area Schools
3375 Willow Avenue
White Bear Lake, Minnesota 55110
Ph: 429-5391

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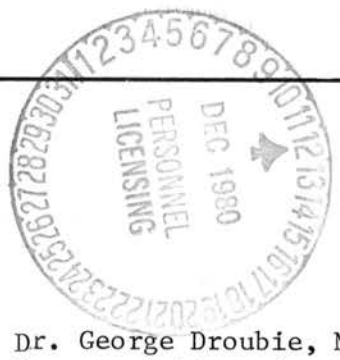

December 10, 1980

Dr. George Droubie, Manager
Personnel Licensing and Placement
Department of Education
State of Minnesota
Capitol Square Building
St. Paul, MN 55101

Dear George:

I want to go on record as being very much opposed to the expanded licensing requirements for athletic coaches in our high schools. The White Bear Lake Area School District is presently experiencing great difficulty in hiring coaches under the present licensing requirements. In fact, we have already cancelled one program, boys' gymnastics, at White Bear Senior High School and are very close to cancelling wrestling.

It just seems irrational to add licensing requirements that are beyond a school district's capability to find qualified persons to fill vacancies. The end result will be the continued and more rapid cancellation of athletic programs.

Sincerely,

Ted

Theodore F. Cunio
Superintendent

pv
cc: M.S.B.A. District VI - Dorothy Rippie, Representative

ST. CLOUD STATE UNIVERSITY
COLLEGE OF EDUCATION
Department of Health, Physical Education & Recreation
St. Cloud, Minnesota 56301
(612) 255-2155

December 10, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

I am writing to express a continued concern regarding the proposed coaching licensure rule.

First and foremost, I look to the State Department for Personnel Licensing to set minimum standards for quality in program offerings rather than maximums.

In order for us to fit into the 12-credit maximum we would have to develop a separate set of courses. This is simply not feasible with our other programs and staff limitations. I urge you to reconsider this proposal so that a minimum standard is set. Colleges and universities can then establish their own programs which meet at least the state minimum requirements and students would take these programs with this understanding. Most of us would feel much more comfortable in offering the coaching licensure program on this basis.

Finally, if some adjustment cannot be made to the proposal, the alternative might be to drop the whole thing and let the "chips fall where they may." This sounds like a giant step backward, but the feasibility of the new proposal on many of our campuses is shaky.

Sincerely,

Frances A. Bleick

Dr. Frances A. Bleick
Coordinator, Physical Education

FAB/drg

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SAINT OLAF COLLEGE • NORTHFIELD, MINNESOTA 55057

December 11, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
Division of Special Services
Minnesota State Department of Education
610 Captiol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear George:

I must express serious personal and professional concern regarding the proposed coaching licensure rule. It seems ironic that I should oppose a licensure rule which seeks to cut back on current requirements but that is exactly what this college would have to do. If we are to continue to prepare highly responsible coaches, our current offerings must be regarded as minimal.

In discussing the matter with members of our Physical Education Department, our college coaches, and with members of the college athletic committee, I can report anxious concern as to how we would joepardize our coaching candidates with a reduced program. Decisions would have to be made as to which parts of paragraph D could be included in a program of reduced credit hours -- more importantly, decisions would have to be made as to what subject matter in our current program could be eliminated without having an effect on the total well-being of boys and girls, and without subjecting coaches to greater liability concerns than they already have.

I urge you to consider carefully the implications of the word "maximum" in Paragraph D so that institutions desiring to require more solid preparation may continue to do so.

Sincerely,

Joe Iverson

Joseph G. Iverson
Chairman, Department of Education

JGI/jh

BURNSVILLE • EAGAN • SAVAGE
INDEPENDENT SCHOOL DISTRICT 191
ATHLETIC DIRECTOR • JIM KEELIN

December 11, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie,

The proposal regarding licensure of coaches is a very satisfactory proposal. It appears that this proposal has resolved any previous difficulties that previous proposals have contained.

On behalf of this schools athletic department I would encourage that the proposal as stated be adopted in its entirity.

Sincerely,

Jim Keelin,
Athletic Director

HOLDINGFORD PUBLIC SCHOOLS

INDEPENDENT DISTRICT 738

Holdingford, Minnesota 56340

ROGER DOUCET
Superintendent
746-2221

DALE BRUNS
Special Programs Director
746-2221

DR. CRAIG PAUL
Secondary Principal
746-2221

WALTER WILSON
Elementary Principal
746-2232

GARY ROEBUCK
Dean and
Activities Director
746-2221

JOE DONNELLY
Counselor
746-2221



December 10, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Mn. 55101

REFERENCE: Response to the Working Draft of the Proposed Rules for the Licensure of Head Varsity Coaches.

A. APPLICABILITY: We are in agreement that the head varsity coach should be a licensed position. However, we would urge a provision for a waiver of the teaching license requirement but to require a core of first aid and emergency medical training in instances where a district is unable to employ a licensed teacher/coach.

Example: We have had substantial problems in recent years in finding some coaching specialties (swimming, gymnastics, etc.) among our new teacher candidates. At the same time, we have had non-teacher, collegiate athletes in our community area that have indicated an interest in coaching. To date we have not hired such persons in a head position, but we have used non-teachers in emergencies in assistant and jr. high coaching positions.

Unfortunately, we have not been able to consider some superior classroom teacher candidates because they lack the coaching specialty we required.

E. ALTERNATIVE ROUTE TO LICENSURE: We suggest this section of the proposed rules be broadened to include community colleges, A.V.T.I.'s, E.C.S.U.'s, community education programs, etc. as appropriate agencies that may sponsor approved programs leading to the licensure of head varsity coaches and programs in first aid and emergency medical care for other coaching personnel.

H. HARDSHIP SITUATIONS: It is our position that the provisional license be available to persons who have completed a program of first aid and emergency medical care which is acceptable to local school boards and officials, regardless of their eligibility for a teacher's license. Limiting the provisional license to one year pending enrollment in a program leading to licensure at a college or university would assuredly lessen the supply of coaching talent available to most districts.

We are in agreement that the ideal coach is a licensed teacher with the coaching license and hopefully with some competitive experience in the specialty. However, we believe that lacking the ideal supply of coaches, the next best resource is a person who is judged by the local school district as capable of managing a safe athletic learning experience; i.e., he/she has some training in first aid and emergency medical care; he/she knows the sport through competitive experience; and he/she is judged by local school officials and school boards to have the skills and enthusiasm to work successfully with young persons.

Sincerely,

Roger Doucet,
Superintendent

RD/pk

cc: Richard J. Anderson MSBA

SAINT OLAF COLLEGE • NORTHFIELD, MINNESOTA 55057
(507) 663-3251

December 9, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

As a Department of Physical Education, we are taking this opportunity to respond to your letter of November 12, 1980, regarding the proposed coaching licensure rule for interscholastic sports in senior high schools.

In visiting with you via telephone, I identified our area of concern.

While we support the five specific areas of competency identified in D of the Working Draft, it would not appear to be possible to realize these competencies in the 12 quarter-hour or 9 semester hour maximum limitation.

The St. Olaf College curriculum is on a course basis. One course converts to 3.65 semester hours.

After considerable discussion by our Physical Education Staff, we feel it would take a minimum of 3 courses to even expose the listed competencies in item "D". This would equate to 10.95 semester hours. While we appreciate the concern for placing a limit on required preparation for interscholastic coaching, we view the proposed maximum of 12 and 9 hours as too restrictive to achieve any meaningful treatment of the competencies.

It would be difficult for our staff to redesign curricular offerings in such areas as kinesiology, exercise physiology, psychology of sport, theory of coaching, etc., in order to "squeeze" them into the maximum proposed. The courses have been designed with regard to current fields of knowledge and to serve students focusing on related fields of sport and exercise in addition to that of secondary education.

In the interest that a more reasonable licensing program might be achieved, we would suggest a range of credit limitations might be considered, i.e., a range of 9-15 semester hours.

We respectfully submit these reactions for your consideration.

Professionally yours,

Tom Porter

Tom Porter, Chairman
Department of Physical Education

TP:sb

Minnesota Association of School Administrators

480 Cedar Street
Hanover Building-Suite 350
Saint Paul, Minnesota 55101
Telephone (612) 224-1828

DEC 1980
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Minnesota Administrators of Special Education

Allied with

Minnesota Association of Educational Office Personnel

DATE: December 8, 1980

TO: Dr. George B. Droubie
Manager, Personnel Licensing
and Placement Section

FROM: Board of Directors
Minnesota Association of School Administrators
by Alan D. Osterndorf, Superintendent at Columbia Heights

RE: Revised Draft of Proposed Coaching Licensure Rule

The Minnesota Association of School Administrators appreciates the opportunity to comment on the draft proposal of the coaching licensure rule. As superintendents, we appreciate the many changes that have been made in the proposed rule from that which was proposed by the Board of Teaching a number of years ago. In general, the Board of Directors of MASA could support the working draft dated November 1980 with one exception.

Ideally, all head varsity coaches would be licensed teachers since an athletic program is seen as an important part of the total educational opportunities which are available to pupils enrolled at the secondary level. We would also want these head coaches to have the knowledges and skills which are defined in Section D, not only for the sake of the students which they will be supervising but also for other coaches who will be serving under the direction of the head coach in the program. We also appreciate the grand personning provisions that are contained in Section F and the implied opportunities for local districts to join together to provide the necessary instruction in first aid and prevention and care of athletic injuries for those persons who have not had such courses and who wish to be licensed under the grand personning clause.

We would, however, strongly request and recommend that Section H relating to school district hardship situations be revised so that provisional licensure may be obtained by persons who are not certified teachers. If this is not done, students throughout the state will be losing out on athletic opportunities because, while persons who have a knowledge and skill of the sport may be available, such persons are not licensed teachers. With a declining pupil enrollment school districts are simply not able to employ new staff and in numerous instances persons who once

coached and who remain with the district in the teaching ranks do not wish to remain with a coaching activity throughout their professional career. Not only is it undersirable to have persons not interested in coaching forced into accepting such assignments but in many cases negotiated master agreements make such forced assignments impossible. If, therefore, those involved in licensure are truly interested in the welfare of students, the hardship provision should be revised to indicate that a provisional license for one school year and renewable for a maximum of one additional school year may be issued to a person to serve as a head varsity coach of an interscholastic sport provided that the following conditions have been met:

1. Evidence that the school district is unable to employ a licensed head varsity coach of interscholastic sports for the current school year, and

2. The person to be employed under such authorization has experience in the sport and can demonstrate the fundamental knowledges and skills necessary for coaching the sport, and

3. The person can provide verification of experience in working with high school or college students in some form of organized group activity.

The MASA Board of Directors believes that if the suggested revision is made the licensure rule pertaining to coaching will recognize the importance of the head varsity coach ot the total educational program while still providing sufficient flexibility to offer a maxium opportunity to students during the time of declining teacher availability for coaching assignments.

We urgently request your consideration of the suggested change.

DEPARTMENT OF ATHLETICS

FALLS HIGH SCHOOL
INTERNATIONAL FALLS, MINNESOTA 56649

Superintendent - James Roberts
1-218-283-8468
Principal - Donald Stadum
1-218-283-2571

ATHLETIC DIRECTOR
Wayne C. Haglund
1-218-283-8890

December 9, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

Your new proposal, with its four key parts for the licensing of coaches, is certainly the right direction to go.

But, in many cases involved under your plan, it will be the older coaches (experience 5-10-15-20 years, etc.) that will be singled out and punished or discriminated against.

Therefore, we feel that any coach who can demonstrate that he/she has completed five athletic seasons of coaching experience prior to July 1, 1982, and is a licensed teacher, should be issued a license as a coach of interscholastic sports.

Reasons:

1. Many of the above class of coaches attended universities and colleges seeking careers in teaching and coaching when the qualifications to coach were a major in physical education. In many cases, not even that. So, they planned their programs accordingly and have qualified for all these years in their present jobs.

2. The above class of coaches, while providing leadership to the youth in all communities of our State, have gained valuable knowledge through many years of practical experiences in actual cases of first aid, prevention and care of injuries, theory and practice of sport techniques, psychology of coaching and many, many years of field experience that no program you design can replace.

3. With the continued drop in enrollments and the tightening of money, causing reduction in the teaching staffs, which involved many your coaches; one must depend on the older coaches for help if the athletic programs for our youth

DEPARTMENT OF ATHLETICS

FALLS HIGH SCHOOL
INTERNATIONAL FALLS, MINNESOTA 56649

Superintendent - James Roberts
1-218-283-8468
Principal - Donald Stadum
1-218-283-2571

ATHLETIC DIRECTOR
Wayne C. Haglund
1-218-283-8890

are to continue. Many of the older coaches have left the coaching field, but are still in active teaching. To ask them to fill in vacancies in coaching and to make them go back for licensing is very unlikely.

4. In most cases during the past several years, due to proper counseling by the colleges and universities, the younger coaches are licensed. The younger people chosing teaching and coaching as their profession will also receive proper counseling so they will be licensed in these fields upon graduation. In a period of a few years, all coaches would be licensed.

Sincerely,

James Roberts

James F. Roberts
Superintendent

Wayne C. Haglund

Wayne C. Haglund
Athletic Director

WCH:ld

HUTCHINSON PUBLIC SCHOOLS

INDEPENDENT SCHOOL DISTRICT NO. 423
HUTCHINSON, MINNESOTA 55350

December 10, 1980



Dr. George Droubie, Manager
Personnel Licensing & Placement
610 Capitol Square Bldg.
550 Cedar St.
St. Paul, MN 55101

Dear Mr. Droubie:

I have reviewed the working draft relating to licensing of coaches and essentially my activities director and I have no quarrel with the concept of our head coaches earning coaching certificates.

Under "D" in the working draft, numbers 1 and 2 are of the utmost importance, but the numbers 3, 4, & 5 appear to be a lot of busy work. Most people who have teaching certificates are quite capable of working with students in extracurricular activities. Another area that ought to receive some emphasis is training in first aid prevention and care of injuries.

One other comment might be made, in our school district we are getting more and more away from college prepared courses and are developing our own staff programs which best fit our community's needs.

I do not know if these comments are of any help, but they appear to be major issues of concern to us.

Sincerely,

E. Dale Birkeland

E. Dale Birkeland
Superintendent of Schools

EDB:bn
CC: David Larsen
Activities Director

CENTRAL DISTRICT SERVICES
30 Glen Street North
Phone [612] 587-2860

SENIOR HIGH SCHOOL
Roberts Road
Phone [612] 587-2151

AREA VOCATIONAL-TECHNICAL INSTITUTE
200 Century Avenue
Phone [612] 879-2321

CROW RIVER COOPERATIVE CENTER
980 2nd Avenue Southeast
Phone [612] 879-2338

JUNIOR HIGH SCHOOL
Roberts Road
Phone [612] 587-2854

ELEMENTARY SCHOOL
100 Glen Street
Phone [612] 587-2837

EQUAL OPPORTUNITY EMPLOYER

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Goodhue Independent School District

NO. 253

GOODHUE, MINNESOTA 55027

DIRECTORS
FR. BRUCE PETERSON
HAROLD BUCK
ROGER KURTTI

JERRY JENSEN, Sec. Prin.
EDWARD GANSKE, Elem. Prin.

PHONE (612) 923-4447



December 8, 1980

Mr. George B. Droubie
Manager, Personnel Licensing and Placement
610 Capitol Square
St. Paul, MN. 55101

Re: 5MCAR Proposed coaching rule

Dear Mr. Droubie,

Our athletic director and coaches have reviewed the latest draft of the proposed coaching rule and recommend the following:

> Remove licensure as a teacher as part of the hardship provision when licensed coaches are not available. In small school systems it may be possible to hire a former athlete with a good background in a specific sport who is not licensed as a teacher. If it is truly a hardship, is the teacher license necessary?

Thank you for the opportunity to review the new material.

Very truly yours,

Arnold Schultz,
Superintendent

plr

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

BECKER PUBLIC SCHOOLS

Independent School District No. 726, P. O. Box 248, Becker, Minn. 55308

Richard K. Harris
Superintendent
Phone (612) 261-4501

Secondary Principal
Barbra Zakrajsek
261-4501

Elementary Principal
Louis Husmann
261-4504

Community Services
Tom Scearcy, Dir.
261-4501

December 8, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar St.
St. Paul, MN 55101

Dear Dr. Droubie:

This is in reference to the working draft of the proposed coaching rule. I wish to comment.

First of all, we support the idea of keeping standards high. But, we have a few areas of concern on the impact to the proposal for the new licensing procedure:

1. July 1, 1982 might be a year too early to get 6 credits or 60 clock hours of extra classes.

2. We might lose some head coaches because of this new requirement.

3. Expense and time might both be a factor in a coach taking extra classes.

4. Hardship provision is good in that a school would be given extra time to meet requirements.

Thank you for considering our expressions of concern.

Sincerely,

Richard K. Harris
Superintendent

RKH:mk

cc: Richard J. Anderson, M.S.B.A.

SCHOOL BOARD:

Malcolm Olson, Chairman – Craig Schwarzkopf, Clerk – Donald Johnson, Treasurer – Waldon Anderson – John Haskell – Glen Seeley

ST. CLOUD STATE UNIVERSITY
COLLEGE OF EDUCATION
OFFICE OF THE DEAN
St. Cloud, Minnesota 56301
(612) 255-3023

12-9-80

Dear George,

For whatever it may be worth, here's a response to the proposed coaching licensure rule — from Ray Collins, chair of our HPER Dept. I did not had a chance to talk with him about this matter — he's relatively new & likely is not fully aware of all that has gone before"!

Hope this of some help!

See you soon —

Ken



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and is in compliance with all state and federal laws prohibiting discrimination.

ADMIN 1000 (Rev. 1/78)
SF-00006-01

STATE OF MINNESOTA

Office Memorandum

DEPARTMENT HPER

TO : Dr. Kenneth Ames

DATE: 12-5-80

FROM : Ray Collins RC

PHONE: 2155

SUBJECT: Coaching Licensure Proposal

In response to your memo of November 17 concerning the State Department of Education version of standards for preparing coaches, I will summarize our department's position on the matter. Basically, we favor a program of preparation that would allow the prospective coach the opportunity to become more competitive in the job market. In other words, the 12-credit requirement should be a minimum figure instead of a maximum one; the student could then decide whether to pursue a complete 36-credit minor or some related type program.

The philosophy to lower requirements for the purpose of accommodating a shortage is not the answer. Realizing coaching positions are so plentiful, it seems logical to us that the employer would still want the best qualified applicant and that the student with the better preparation would have a decided advantage in competing for a job. To have a 12-credit maximum with no alternative would result in virtually everyone achieving only minimum mediocrity in preparation. Only a few of the more resourceful students would tend to complete more than 12 credits unless some incentive to do so was included in the approved plan. A program with some flexibility in number of credits offered plus strong academic advisement would do that.

Of course, this is a compromise position because implementation of the 12-credit proposal or something similar appears inevitable. The ideal would be to require a full minor for coaching to ensure the preparation of quality coaches and the employers recognize the need for this level of preparation by improving the compensatory pay and working conditions of coaches.

RC/dg



HAMLINE UNIVERSITY
DEPARTMENT OF HEALTH AND PHYSICAL EDUCATION
ST. PAUL, MINNESOTA 55104



December 9, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie,

I am disturbed at the proposal for licensure of varsity coaches of interscholastic sports for two reasons:

1. It is impossible for sufficient "knowledge, skills, and understandings" in the five areas listed under D of the working draft to be gained within the twelve quarter maximum. The time is simply not sufficient.
2. The private, liberal arts colleges will not be able to offer classes for the coaching endorsement with the twelve quarter hour limitation. Our courses simply can't be packaged in that manner.

It seems to me that a minimum number of hours should be decided upon with each institution having the perogative to determine the depth of preparation they feel is necessary to prepare their students. If the word maximum were changed to minimum I would support the working draft.

Sincerely,

Kent Stahly

Kent Stahly
Department Chairman
Health, & Physical Education

KS:dmm

ROGER A. OLSON
High School Principal

DENNIS MONROE
Elementary School Principal

KENYON PUBLIC SCHOOL

INDEPENDENT SCHOOL DISTRICT NO. 254
401 Forest Street Telephone 789-6187
Kenyon, Minnesota 55946
ARLEN JOHNSON, Superintendent

December 9, 1980



Dr. George Droubie
Personnel Licensing
610 Capitol Square
550 Cedar St.
St. Paul, MN 55101

Re: Coaches Licensure

Dear Dr. Droubie:

It is my firm belief that further restrains will further jeopardize the athletic offerings available to students! To expand beyond the present list of requirements is going to far.

Why create a rule that has the emergency clause for exceptions? Pay is already low and to require people, who are probably doing the job out of the goodness of their heart, to go back to school will result in fewer candidates to do the jobs.

I do not feel administrators and athletic directors have placed our student athletes in danger by the coaches we hire for our coaching jobs.

Respectfully,

Arlen Johnson
Supt. of School

INDEPENDENT SCHOOL DISTRICT NO. 564
THIEF RIVER FALLS, MINNESOTA 56701
DR. WILLIAM CORLISS, SUPERINTENDENT OF SCHOOLS

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LINCOLN SENIOR HIGH SCHOOL

Telephone: 218-681-2700
Frank Hamerlinck, Principal
Michael Novak, Assistant Principal

December 8, 1980

Dr. George B. Droubie, Manager
Personnel Licensing & Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101



Dear Dr. Droubie:

RE: 5MCAR .....Head Varsity Coaches.....

We have reviewed the Working Draft of the licensing of Head Varsity Coaches of Interscholastic Sports in senior high schools and have only the following comments to make:

(ITEM F): In most areas of licensure, where individuals are "grandfathered" in upon their application, a license is eithered issued or denied. Head coaches who are currently employed generally are better equiped to handle first aid and can deal with athletic injuries better than most college graduates because of experience, in-service workshops, and clinics. Requiring an additional specific number of hours for these people seems to defeat the spirit and intent of the "grandfathering" clause.

This is only an observation but it does effect a number of people who have been doing a good job for the schools and the students they work with or else they would not be in a position of making the application for the licensure.

Sincerely,

Frank Hamerlinck

Frank Hamerlinck, Principal
Lincoln Senior High School

FH/sk

8 December 1980



Dr. George Droubie
Minnesota State Department of Education
St. Paul, Minnesota 55101

Dear Mr. Droubie,

I was recently sent a copy of the Revised Draft of Proposed Coaching Licensure Rule. It came from a colleague, asking me to lobby for a greater maximum of credit hours for qualification.

I concur with the Draft and do not agree with my profess ional associate.

These are times in which we must make it as easy as possible for people to enter coaching consistent with the welfare of the student athletes. At Northfield High School, for instance, 25 coaching positions were open in August of this year and gymnastics is being dropped for lack of a coach.

To create unnecessary impediments to the coaching profession is to do a terrible dis-service to our youngsters. We need access to all sorts of well-motivated prospective coaches... part-time and teacher-coaches... including engineers, preachers, sales-people, and you-name-it.

Granted 12 hours (or 60) is not optimum preparation to coach athletics in the technical and specialized manner of our time, but in keeping the requirements to a functional minimum, we shall gain access to hundreds of able, well-motivated prospects we could lose if grand limits are enforced.

Professional enthusiasm has to be tempered with the realities of our time.

Sincerely,

W.L. Huyck
Professor and Chairman of Phys. Ed.

ADMINISTRATION
DR. PIUS J. LACHER
Superintendent 679-3560
JOSEPH M. LUTZ
Administrative Assistant 679-2423
Athletic Director
ROBERT A. LORENCE
Senior High Principal 679-2423
ROBERT F. LANOUE
Junior High Principal 679-2423
JOSEPH A. JOHNSON
Elementary Director 679-3731
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KARL E. DEIS
Community Education Director 679-2423
RUSSELL H. MILLS
Work Study Coordinator 679-2423
THOMAS M. MOORE
Vocational Center Director 679-2060

MORA PUBLIC SCHOOLS

INDEPENDENT SCHOOL DISTRICT 332
KANABEC COUNTY
400 East Maple Avenue
MORA, MINNESOTA 55051

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DELL TURNACLIFF, Director

December 8, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

The Mora school district has discussed the working draft of the licensure requirements for varsity interscholastic coaches. We find the new proposed rules a healthy change from those proposed two years ago by the Board of Teaching.

We feel, however, that in hardship situations the choice should not be restricted to a licensed teacher. While it is always desireable to find teacher-coaches, it is sometimes not possible to do so and a proposed program that serves young people should not need to be canceled if adequate community people are available when a teacher-coach is not.

Sincerely,

Pius J. Lacher, Ed.D.
Superintendent of Schools

kjk

ATHLETICS

MACALESTER COLLEGE SAINT PAUL, MINNESOTA 55105 (612) 647-6267

December 8, 1980



Dr. George Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I have read the proposed coaching licensure rule and have some concerns with the proposal. There are five specific areas of competency which the students are supposed to achieve in the licensure program.

It seems evident to me that such competencies can not be realized within a twelve quarter hour or nine semester hour academic program.

The areas of competency are fine, but I believe more credit hours would be needed to cover the areas adequately.

Sincerely,

Dr. Dennis Keihn
Chairman of Physical Education Dept.

DK:v

cc: Dr. Richard Dierenfield
Dr. Frank Mach

FROM THE DESK OF
Frank Mach
Phy. Ed, Health & Athletics
Phone: 647-5356

12/4/80

Dr. Stoudt -

For your information, this letter went to the private colleges in Wisconsin. I believe Mary sent a similar letter to the state colleges.

Frank Mach



COLLEGE OF ST. THOMAS
St. Paul, Minnesota 55105

DEPARTMENT OF PHYSICAL EDUCATION
HEALTH AND ATHLETICS

December 5, 1980

Dear Colleague:

At the request of the department heads of the colleges and universities represented at the 1980 MAHPERD meeting, Mary Young and I met with Dr. Droubie on October 28, 1980, to express our mutual concern about the proposed program for licensure of athletic coaches in Minnesota. Specifically, concern was expressed about the proposal to impose a maximum of 12 quarter hours of credit upon the course work which could be required of our students who seek a coaching licensure program in our colleges and universities. You will note from a brief perusal of the enclosed working draft that our arguments were apparently not very persuasive.

You will notice in the enclosed working draft that there are five specific areas of competency which the students are supposed to achieve in the licensure program. It seems evident to most of us that such competencies can not be realized within a twelve quarter hour or nine semester hour academic program. Therefore, Mary and I urge you to respond to Dr. Droubie's request for comments and suggestions prior to December 15, 1980. It is my understanding that this matter will go to a public hearing in the near future. Your considered comments to Dr. Droubie, and your attendance at the public hearing, the time and date to be announced, are essential steps toward achieving a reasonable coaching licensure program.

Sincerely,

Frank Mach

Dr. Frank Mach
Department Head

FGM/lad
encl

OFFICE OF THE SUPERINTENDENT

LARRY TOMPKINS

Southland Independent School District 500

ADAMS, MINNESOTA 55909 TELEPHONE (507) 582-3283



December 4, 1980

Dr. George Droubie, Manager
Personnel Licensing
610 Capitol Square Building
550 Cedar St.
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I am responding to the latest draft of the proposed coaching rule.

The requirement that a coach has to be a licensed teacher has virtually taken away a very viable alternative to finding a coach.

When qualified staff do not wish to take coaching positions, a district is asking for potential personnel attitude problems when the position is forced on them. Likewise, if they have been coaching for years and wish to retire from coaching, they feel trapped when a district will not let them relinquish those duties.

Obviously, there are not people outside the school system that are just waiting to pounce on a coaching position in the schools. We have had to hire an assistant coach in two different sports from outside the staff and actively had to solicit them. There were no takers even though we advertised for weeks.

Regarding the 6 credits or 60 clock hours of training in first aide and the prevention and care of injuries, this should not be a requirement to enter as a coach but there should be the understanding that the person you hire receive training in these areas. Then the area community colleges should be in a position to offer some workshops sessions every year.

If they had to rely on non-teacher coaches for their total enrollment, they would not get enough participants as schools do not solicit these people unless they have to. But perhaps present coaches would attend a refresher course or for credits.

To sum it up, in a time of teacher and coaching shortages, at least in the out-state area, it is self defeating to make requirements more strict.

I would see no upgrading of the coaching profession by having a hard and fast rule requiring all to have a teaching license.

Sincerely,

Larry Tompkins

Larry Tompkins,
Superintendent

Appleton Public Schools

Independent School District No. 784

128 So. Hering Appleton, Minnesota 56208

Erling H. Kolke, Superintendent

Telephone: 612-289-1611

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December 2, 1980

PERSONNEL LICENSING DEC 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar St.
St. Paul, MN 55101

Dear Dr. Droubie:

This letter is in regard to the proposed coaching rule and the impact upon our program.

It is requested that the rule be flexible and not too strict. If a licensed teacher-coach is mandated it would put a crimp in our program. There should be a process for locating a coach. For example:

First, try to locate a licensed teacher coach, if not available then locate a licensed teacher on the staff, if not available then locate a licensed teacher-coach in the community, if not available then locate a licensed coach in the community, if not available then locate a non licensed teacher-coach.

Same as Eldred proposed

We believe that a licensed coach should be sought, but in the event one cannot be found the school should have the opportunity to use their discretion in hiring a coach. If there are no alternatives provided many sports such as golf and cross country will be eliminated.

Thank you for your consideration.

Sincerely,

Erling H. Kolke

Erling H. Kolke
Superintendent of Schools

EHK/rlh

ROBERT CAREY, H. S. Principal

JANET HANAUER, Elem. Principal

BILL BECK, Asst. H. S. Principal, Athletic Director

MARLOW PFAFF, Counselor

EQUAL OPPORTUNITY INSTITUTION

INDEPENDENT SCHOOL DISTRICT 395

500 E. Paquin
Waterville, Minnesota 56096
507-362-4432

Dr. Bruce L. Johnson
Superintendent



December 4, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar St.
St. Paul, MN 55101

Dear Dr. Droubie:

I have reviewed the proposed licensure proposal for coaches with our high school principal and athletic director. We find that the proposal provides adequate flexibility to school districts for hiring and yet provides standards for licensure of coaches.

This district supports the November working draft as proposed.

Sincerely yours,

Bruce L. Johnson
Superintendent

BLJ:lk

cc: Mr. Smith

NORTH ST. PAUL - MAPLEWOOD - OAKDALE SCHOOLS
INDEPENDENT SCHOOL DISTRICT NO. 622
2055 E. Larpenteur Ave.
Maplewood, MN 55109

December 8, 1980



TO: Dr. George B. Droubie, Manager
Personnel Licensing and Placement
Minnesota State Department of Education

FROM: R. St. Germain R St Germain
Assistant Superintendent for Secondary Education

RE: Revised Draft of Proposed Coaching
Licensure Rule

Attached are written comments from the principals and athletic directors from North and Tartan Senior High Schools, relative to the revised draft of proposed coaching licensure rule.

RStG/wo

Att: 2

TARTAN HIGH SCHOOL
INDEPENDENT SCHOOL DISTRICT NO. 622
828 No. Greenway Ave.
SAINT PAUL, MINNESOTA 55119

GENERAL OFFICE 770-4680
PRINCIPAL'S OFFICE 770-4628
ACTIVITY DIRECTOR 770-4627
GUIDANCE OFFICE 770-4633

December 4, 1980

To: Dr. Richard St. Germain

From: Felix Crepeau - Lawrence Hartman

Subject: Revised Draft - Coaching Licensure Rule

It is the best proposal to date for the coaching licensure rule.

Comments:

1. It is apparent any new rule will present problems for schools in Minnesota.
2. The proposal does not provide a grandfather clause.
3. Some coaches holding head varsity positions may be reluctant to earn the additional credits if they do not have a coaching certificate.
4. Some head coaches may go so far as to give up coaching rather than earn the additional credits necessary. In doing so they complicate the job of getting a head coach when no teaching position is available.
5. It does provide for hardship situations and any school with a coach willing to, will have two years to earn a coaching certificate.
6. Allowing unlicensed persons to assist in coaching is being very realistic in the face of the problem of a coaching shortage.

MEMORANDUM

RECEIVED BY
DEC 5 1980
R. St.G.

December 5, 1980

TO: R. St. Germain

FROM: John Bartz
Carver Fouks

RE: Revised Draft
Coaching Licensure Rule

Comments:

A. Would put severe restraints on athletic programs. With declining enrollment and reduced teaching staffs these probably would be areas that could not be filled with a licensed coach.

C. This is acceptable with the recommendation that if the school could not obtain a licensed head coach that the school be allowed to hire an unlicensed head coach.

D. Qualifications: Earn six quarter hours rather than 12 as specified and that one of the programs should consist of First Aid and Prevention and Care of Athletic Injuries.

F. Recommend this only for head coaches and not assistant, or junior high school coaches, and that a head coach be allowed a waiver of one year to receive her/his certification.

G. Acceptable.

H. Acceptable. 3. Acceptable with a maximum of 6 quarter hours and part of it be in First Aid.

JB:CF:jac

ORONO INDEPENDENT SCHOOL DISTRICT NO. 278
INDEPENDENCE - LONG LAKE - MAPLE PLAIN - MEDINA - MINNETONKA BEACH - ORONO
685 OLD CRYSTAL BAY ROAD
LONG LAKE, MINNESOTA 55356

DR. GALE G. LENNON
SUPERINTENDENT OF SCHOOLS
(612) 473-7313

W. A. FENHOLT
ASS'T TO THE SUPERINTENDENT
(612) 473-7313

December 4, 1980



Dr. George Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie,

Re: Proposed Licensure for athletic coaches.

We stand opposed to this new proposal. Meeting this type of requirement would probably result in the dropping of many sports from the athletic programs of many schools. There is no evidence that a teaching license in any field, with physical education the only exception, is helpful or needed to coach an athletic team. If holding a teaching license is a valid requirement for senior high sports why is it not a valid requirement for junior high sports where more real "teaching and coaching" probably takes place.

In our opinion the new requirements are designed primarily to insure classes for colleges and universities and have very little, if any, validity as they relate to running an athletic program.

Sincerely,

DR. K. B. WINTER
SR. HIGH SCHOOL PRINCIPAL
473-5472

W. V. NELSON
MIDDLE SCHOOL PRINCIPAL
473-7301

RONALD E. GILBERT
ELEMENTARY COORDINATOR
473-7317

C. WAYNE SMITH
ASSOC. SR. HIGH SCHOOL PRINCIPAL
473-5472

JAMES E. SEITER
ASSOC. MIDDLE SCHOOL PRINCIPAL
473-7301

MRS. MARVEL A. BONGART
MAPLE PLAIN ELEMENTARY PRINCIPAL
479-1977

OSLO PUBLIC SCHOOLS

INDEPENDENT SCHOOL DISTRICT NO. 442

OSLO, MINNESOTA 56744

PHONE 218-695-2121

ADMINISTRATION
VERN E. PFEIFER, SUPERINTENDENT
DERRILL J. LIFFRIG, PRINCIPAL

JOHN GERSZEWSKI, CHAIRMAN
THOMAS GERSZEWSKI, CLERK
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RONALD EIDE, DIRECTOR
WILLIAM MICHALSKI, DIRECTOR
WELDON McFARLAND, DIRECTOR

December 5, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I wish to make a few comments concerning the proposed licensure of varsity coaches.

At a small school such as Oslo, getting licensed coaches is almost impossible and we have had to turn to individuals in the community to fill our needs. As enrollments drop small schools have had to place faculty members on unrequested leave. This has resulted in situations where few and in some cases none of the faculty are qualified coaches.

With the recommended licensure requirements, we would find that as qualified personnel is not available and we have no recourse but to use qualified people, it will necessitate dropping sports in certain situations.

I don't believe that it is anyone's desire to curtail opportunities for students in the small school. I ask that when these regulations are being considered, that the obstacles faced by small rural schools be kept in mind.

Sincerely,

Vern E. Pfeifer

Vern E. Pfeifer
Superintendent
Oslo Public Schools
Oslo, Minnesota 56744

WILLMAR, MINNESOTA 56201
Independent School District 347
611 West 5th Street

THE WILLMAR PUBLIC SCHOOLS

Lowell Melbye, Superintendent
Phone 612-231-1100
Orlo C. Almlie, Director of Business Affairs

December 4, 1980



Mr. George Droubie, Manager
Personnel Licensing & Placement
State Department of Education
Capitol Square Building
St. Paul, MN 55101

Dear Mr. Droubie:

Our response to the proposal you sent out on November 24 for the licensing of athletic coaches is that we can support it. We think it is very workable.

Yours truly,

Lowell Melbye

LOWELL MELBYE
Superintendent

gg

Independent School District no. 834
1875 SOUTH GREELEY STREET
STILLWATER, MINNESOTA 55082
Phone 439-5160

December 2, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55701

Dear Dr. Droubie:

The board of education and administrative staff of School District 834 has had an opportunity to review the November, 1980, working draft of rules for licensing head varsity coaches of senior high interscholastic sports.

We would like to support the proposed rule. We think we can operate under this rule and continue to find qualified coaches to maintain our total program of activities. Previous proposals were too restrictive and would have forced the district to cut back on programs for students simply because licensed coaches were not available.

The draft eliminates the discriminatory portion of the present regulation without undue hardship on school districts.

Sincerely,

Robert L. Miller

Superintendent

RLM/je

cc: Mr. Richard J. Anderson, MSBA

An Equal Opportunity Employer

Board of Education
HARRIET McPHERSON, Chairperson
TOM SCHEUERMAN, Clerk
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LYMAN GEARY
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ROBERT MILLER, Superintendent

ST. CLOUD OFFICIALS ASSOCIATION

JOHN LIESER, President

DICK PUTZ, Secretary
FOOTBALL, BASKETBALL, BASEBALL
1144 - 35th Ave. N.
St. Cloud, Mn. 56301

WILL THOMPSON, Secretary
WRESTLING
835 Wash. Mem. Dr.
St. Cloud, Mn. 56301

DEC 1980
PERSONNEL
LICENSING

12-3-80

Dr. Droubie,

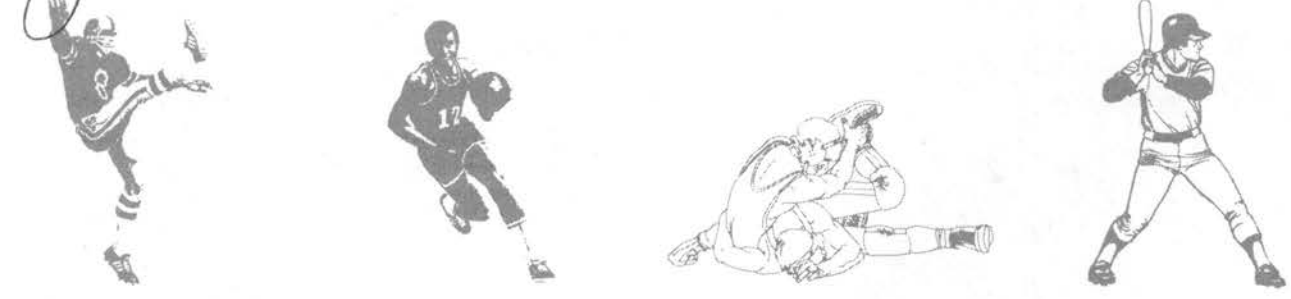
I recently read the copy of the proposal to license head coaches of varsity sports. I have one response.

I have been head golf coach at Apollo High School in St. Cloud for the post ten years. In those ten years I have never needed to use first aid for an injury. Why should I now be required to get 6 credits or 60 clock hours of first aid instruction and the care and prevention of athletic injuries?

I have a suggestion! Grandfather all head coaches and require your regulations to those head coaches who start after July 1, 1982. I await your reply—

Sincerely yours,

John Lieser



LOIS BURNES, Chairman
MARY ANN SCHARF, Clerk
LESLIE LINDOR, Vice Chairman
HAROLD LUTHI, Treasurer
NEIL SCHMIDGALL
PAUL KOPEL
DICK HUFFORD

Morris Public Schools

FRED M. SWITZER, Superintendent
201 SOUTH COLUMBIA
MORRIS, MINNESOTA 56267

December 3, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Re: Licensing Coaches

Dear Dr. Droubie:

Morris School system is especially concerned about Item (H2) of the coaching licensing requirements.

We presently have experienced and compentent coaches who do not hold a valid teaching license. If this provision is adopted, we will be forced to eliminate some girls sports. How do we explain this dilema to Title IX?

If an individual in the system, who holds a valid teaching certificate and a coaching certificate requests to coach, they should be given that responsibility. However, when you cannot meet the provisions, the alternative is a greater problem.

Also the provision (B3) which defines a Senior High School should be changed to provide equality in all schools by suggesting that a Senior High School be defined as grades 10-12. Otherwise some schools would need varsity coaches for 9th grade while other schools would not.

Item (I) could create some problems. We have a woman coach and holds a teaching certificate and a coaching certificate. Will she continue to gather renewal credits for her teaching certificate when she is not teaching? We have only one female staff member who is willing to coach.

Sincerely,

Fred M. Switzer
Superintendent

FMS:11

INDEPENDENT DISTRICT No. 390

ADMINISTRATION

Daniel A. Skoog, Superintendent
634-2735
David W. Meade, Secondary Principal
634-2510
Gene Geisler, Elementary Principal
634-2366
Randall S. Nelson, Counselor
634-2510

LAKE OF THE WOODS SCHOOLS

DISTRICT OFFICE AT

Baudette, Minnesota 56623

BOARD OF DIRECTORS

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Earl Anderson, Clerk
Donavon Smith, Treasurer
Nancy Humeniuk, Director
David Hagen, Director
Roger Knutson, Director



November 25, 1980

Dr. George B. Droubie, Mgr.
Personnel Licensing and Placement
610 Capitol Square Bldg.
550 Cedar Street
St. Paul, Minnesota
55101

Dear George:

A quick note to tell you that we at Lake of the Woods High School are in concurrence with the November working draft on the licensing of head varsity coaches.

In view of the supply and demand situation that exists with coaches, we think this is a realistic proposal.

Sincerely yours,

David W. Meade
Secondary Principal

DWM/pd

cc: Dan Skoog
Art Anderson

Grygla-Gatzke
INDEPENDENT SCHOOL DIST. NO. 447
P.O. Box 18
Grygla, Minnesota 56727
Phone (218)294-6155

PRINCIPAL K-12
Basil Shell
Telephone (218) 294-6155

Salvinus Hoffert, Superintendent of Schools

BOARD OF EDUCATION
John Smeby, Chairman
Glenn Larson, Vice Chairman
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Phyllis Wikert, Clerk
Bruce Lunsetter, Director
Ell Kay Foss, Director



December 4, 1980

Dr. George B. Droubie
Personal Licensing & Placement
610 Capitol Square Building
St. Paul, Minnesota 55101

Dear Mr. Droubie:

I have reviewed the proposed coaching rule with our athletic director. After discussing it, we feel that we could live with the proposed rule for the head coach as it is now written.

Sincerely,

Salvinus Hoffert

Salvinus Hoffert
Superintendent

cl

Hibbing Public Schools

Hibbing, Minnesota 55746

Phone 218 - 263-4850

E. W. Eggers, Superintendent

John W. Slattery, Adm. Asst. to Supt.

DEC 1980
PERSONNEL LICENSING

December 1, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I have reviewed the proposal for licensing head varsity coaches of interscholastic sports in senior high schools. I have no argument with the proposal at all, except I can visualize the time coming when we might not find a teacher on our staff willing to assume a head coaching position (i.e. girls gymnastics etc.) nor find a licensed teacher not on our staff, to accept the position.

We could well be better off, in fact, with a well-trained coach (gymnast) who would be more cognizant of the training and dangers connected with a sport rather than a teacher who might take the assignment "to help out". With that in mind I would like to suggest under paragraph H 2:

> "The person to be employed under such authorization should if possible hold a current, valid Minnesota teaching license, and . . ."

Sincerely,

E. W. Eggers
Superintendent of Schools

cc: Mr. Richard Anderson, MSBA

TRI-MONT AREA PUBLIC SCHOOLS

INDEPENDENT SCHOOL DISTRICT NO. 457

TRIMONT, MINNESOTA 56176

HAROLD REMME
SUPERINTENDENT

KENT NELSON
HIGH SCHOOL PRINCIPAL

MRS. VIVIAN ROBERTS
ELEMENTARY PRINCIPAL

December 3, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Sq. Building
550 Cedar Street
St. Paul, Mn. 55101

Dear Dr. Droubie,

This letter is in response to the "Working Draft " of the proposal for licensure of head varsity coaches. I have reviewed it and offer the following comments.

I am in general agreement with statements A-G. However, being from a small school setting I am concerned about the prospects of obtaining coaches in the future. I fear a very real shortage may exist in the near future due to retirement of coaches and the difficulty of attracting people into the teaching profession. My concern is with H.2, specifically, in that persons without a valid teaching license may be available to the small schools. As I understand the proposal these persons could not be considered. I would like to see a statement added which would allow such persons to be considered if all other possibilities were exhausted.

Thank you for your consideration.

Sincerely,

Harold Remme

Harold Remme

INDEPENDENT SCHOOL DISTRICT 195

RANDOLPH, MINNESOTA 55065

507-263-2151
507-645-4773
612-332-2997

DR. RONALD G. JAMES
SUPERINTENDENT

December 3, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
Minnesota School Boards Association
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

The latest draft of the proposed coaching rule is definitely an improvement over the initial one. Of the four key parts numbers one, three, and four are acceptable.

I do not support the position that a head coach must be a licensed teacher. It may be a desirable condition but certainly not a necessary one. Many teachers are no longer interested in coaching, and the smaller schools especially are finding it difficult to fill the head coaching positions with licensed teachers.

Please consider the deletion of the last sentence of part A.

Very truly yours,

Ronald G. James

Dr. Ronald G. James
Superintendent

RJ/rp

THE PUBLIC SCHOOLS
REDWOOD FALLS, MINNESOTA 56283

THOMAS LYKINS
SUPERINTENDENT
507 637-3531



November 26, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I am writing in regard to the proposed regulation for licensing of Head Varsity Coaches of Interscholastic Sports in Senior High Schools.

We have one head coach who would not qualify for certification under the proposed regulations. This coach has his training in community recreation. Although he is well qualified to serve as a head tennis coach, he is not qualified for a teaching license.

The other area where I have a greater concern is Section H, Subdivision 3. I feel this provision should be removed from the proposed provisional licensing regulation. Very often people we would be able to recruit to serve as a short term head coach, to help us out of a hardship situation, would serve as a head coach only to help us out of a difficult situation. These people would be unwilling to enroll in a program leading to coaching certification in order to be able to help us out. I am of the opinion that this part of the proposed regulation would eliminate from consideration a large percentage of prospects for this type of assignment.

Thank you for your consideration.

Sincerely,

Thomas Lykins

Thomas Lykins
Superintendent

TL:amd

An Equal Opportunity Employer

WAYZATA PUBLIC SCHOOLS

INDEPENDENT SCHOOL DISTRICT 284
210 D. NORTH STATE HIGHWAY 101

WAYZATA, MINNESOTA
55391

ADMINISTRATIVE OFFICES
(612) 473-4621

December 3, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
Saint Paul, Minnesota 55101

Dear George:

I have had the opportunity of reviewing the working draft concerning lincensure of head varsity coaches of interscholastic sports in senior high schools with Mr. Jim Graven, our Athletic Director. Mr. Graven observes and I agree that the proposed rules represent an improvement, but still would create a problem for this School District.

Specifically, this year, we have found it necessary to employ three head varsity coaches who do not have teaching certificates. The proposed procedure describing a hardship situation does make it possible for a district to obtain a provisional license for one year for a teacher to serve as a head varsity coach. In our example of our current year's experience, we were unable to employ a teacher who either had the desire or the knowledge of the specific sports in question. Under these circumstances apparently our only option would have been to drop the sports.

Again, George, while we feel these rules represent an improvement, we do feel that the hardship provision should be reviewed further.

Cordially yours,

Robert D. Snyder
Superintendent of Schools

RDS:lmb
cc: Mr. Richard J. Anderson, MSBA
Mr. James Graven, Athletic Director

INDEPENDENT SCHOOL DISTRICT NO. 279

DR. LE ROY V. NORSTED
SUPERINTENDENT OF SCHOOLS

DISTRICT OFFICES
317 Second Avenue N.W.

OSSEO, MINNESOTA 55369
Phone: 612 - 425 -4131

December 3, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

In response to your recommendation, a meeting was held with interested administrative personnel in the District 279 schools which included Osseo Senior High School and Park Center Senior High School relative to your request for a discussion on the matter of the licensing of head coaches at the senior high level in all sports, both boys and girls.

It was the feeling of the administration of these two high schools and the Superintendent of Schools that the recommendations being proposed are a very satisfactory solution to a serious problem.

Should licensing of head coaches at the high school level, as well as requirements as stated for assistant coaches and head coaches at other levels be approved as proposed, we could function very well under these conditions and feel that it would not in any way be injurious to any of our programs nor the participants therein.

Thank you for considering us in your deliberations.

Sincerely,

LeRoy V. Norsted, Ph. D.
Superintendent of Schools

LVN:hn

EXCELERASE by Fox River

Directors:
Jerry Pratt
Tom Haro
JulAnn Meech
Eugene Putzke

OREL DAHLE, 837-5101
Superintendent

EDWIN PARRY, 837-5102
High School Principal

INDEPENDENT SCHOOL DISTRICT 820
STATE OF MINNESOTA
SEBEKA, MINNESOTA 56477

Officers:
Jack Graba, President
Marguerite Anderson, Clerk
Clifford Gronlund, Treasurer

DAVID LEPINSKI, 837-5102
Assistant High School Principal

HAROLD BERG, 837-5103
Elementary Principal

December 2, 1980

Dr. George Droubie, Manager
Personnel Licensing & Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Sir:

This letter is in reference to the proposed draft of regulations "the licensure requirements for coaching inter-scholastic sports in Sr. High School". (5MCAR Nov. 1980)

I think the proposed regulations are very satisfactory. I even agree that the head varsity coach should be a licensed teacher.

I would hope that you can get the State Board to adopt this regulation without amendment.

Yours truly,

Orel Dahle

Orel Dahle
Supt. of Schools
Sebeka, Minnesota

OD/sm

25% COTTON
EXCELERASE

CEYLON PUBLIC SCHOOLS

INDEPENDENT DISTRICT 451
CEYLON, MINNESOTA 56121

Leila Swenberg
Elementary Principal

Robert T. Olson
Superintendent of Schools
Phone 632-4436

Delevan P. Hiebert
High School Principal

December 2, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I have reviewed the latest draft of the proposed coaching rule, "5 MCAR - Head varsity coaches of interscholastic sports in senior high schools," provisions A through I, with our athletic director.

We are in full support of your working draft as it is and we commend you for your efforts. It would seem to me that all schools, large, small, or in-between, should be able to live, comfortably with this proposal.

Thank you for your work on this important proposal, we are happy to see that you have brought sense and good judgment to an area that could have turned out to be a nightmare for all of us.

Sincerely,

Robert T. Olson

Robert T. Olson
Superintendent

RTO:dp

Minnesota
Federation of Teachers
175 AURORA AVENUE SAINT PAUL, MINNESOTA 55103
612/227—8583



TO: Dr. George B. Droubie, Manager
Personnel Licensing and Placement
Division of Special Services

FROM: Minn. Federation of Teachers
Alan F. Olson, Staff Representative

DATE: December 1, 1980

SUBJECT: Revised Draft of Proposed Coaching Licensure Rule

In response to your letter (Nov. 12, 1980), the MFT position on licensure for coaches is:

1. All head coaches of interscholastic sports, at every level, should be required to hold a teaching license and a coaching license.

2. Non-teachers only be allowed to assist qualified teachers under an on-site, supervisory relationship.

3. An alternative plan be available to allow local districts to provide licensing requirements through in-service.

4. Any licensure plan should have special provisions for those people who are already head coaches. (Grandfather Provision).

We feel that the proposed coaching licensure rule, although not exacting what we would like to see, is a step in the right direction to help insure that athletics will be a professional teaching function of school districts and that the safety and welfare of the students will be protected.

Sincerely,

Alan F. Olson

Alan F. Olson
MFT

AO/rr
opeiu#12

EDINA PUBLIC SCHOOLS
INDEPENDENT SCHOOL DISTRICT 273
5555 WEST 70TH STREET • EDINA, MINNESOTA 55435 • 612-944-3613

December 2, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
Division of Special Services
Minnesota State Department of Education
Capitol Square, 550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I want to go on record as opposing several aspects of the proposed licensure requirements for head coaches. My specific concerns are as follows. The proposed licensure allows only people with teaching certificates to be head coaches. Even Section H, dealing with school hardship situations, permits the school superintendent to grant a provisional license for one year "to a teacher" for the purpose of serving as head coach. In a period of reduction of staff, and of aging staff, it becomes more difficult for many districts to secure coaches. Putting this restriction on the licensure will require many districts to drop a sport when no head coach can be found; or, it may cause districts to hire head coaches who are known to be less than desirable for the sole purpose of continuing a particular student activity.

My suggestion therefore would be to alter the licensure proposal as follows: require districts to offer head coaching assignments to the current faculty; and, if no one is interested, to advertise for head coaches possessing a teaching certificate. If none are available, or if the only people available have had questionable experience, then a school district would be allowed to secure head coaches on a year to year basis who do not have a teaching certificate, such a provisional annual license to be renewed by the Commissioner of Education.

Sincerely,

Ralph H. Lieber
Superintendent of Schools

RHL:sl

INDEPENDENT SCHOOL DISTRICT NO. 77

Office of Assistant Superintendent

PHONE: (507) 387-3461
51 PARK LANE
MANKATO, MINNESOTA 56001

December 2, 1980

Dr. George Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dr. Droubie:

I have reviewed the draft of the proposal for licensure of coaches with our administrators and athletic directors. We all feel that it is a substantial improvement over early proposals.

We have one area of concern. In the Mankato School District, we are facing the need to terminate a substantial number of teachers due to reduction in enrollment and general budget limitations. It is quite possible that some of the teachers terminated will be head varsity coaches. Because it is very unlikely that we will hire new teachers, the chance of replacing these coaches with licensed personnel is doubtful.

We wish that the hardship provision would allow a district to employ, on a provisional basis, a person without a teacher's license, for service as a varsity coach. Without this flexibility, we feel that the only option to providing a licensed teacher/coach will be to eliminate the sport.

We have been facing, for some time, a real crunch in obtaining qualified coaches. This is due largely to two reasons: 1) We have been cutting staff because of enrollment decline and budget reductions, and, 2) Teachers are so much less mobile today than they were in the past. As coaches age and drop out of the active coaching ranks but stay in the system as teachers, it is virtually impossible to replace them because teaching vacancies are so limited. We are absolutely dependent on drawing from the non-teacher ranks to fill some of our coaching jobs. We see this situation becoming more severe in the future.

We appreciate your interest and concern in our problem and hope that the views we have expressed may be forwarded to the people making the decision in this matter.

Sincerely,

R. Utzinger

R. J. Utzinger
Assistant Superintendent

RJU:mhh

BOARD OF EDUCATION
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LARRY RIVARD, Director

INDEPENDENT SCHOOL DISTRICT NO. 437
ARGYLE, MINNESOTA 56713
Phone 437-6615 or 437-6616

VICTOR SLETTEN, Superintendent
Phone 437-6615

VICTOR L. LARSON, H.S. Principal
Phone 437-6616
OLLEN E. CHURCH, Elem. Principal
Phone 437-6616

December 2, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Sq. Bldg.-550 Cedar St.
St. Paul, Minn. 55101

Dear Dr. Droubie:

Referance to Working Draft - All New Material, November, 1980; specifically to section D. Qualifications for licensure.

Suggest the requirement of a course in officiating in the sport of licensure.

Rational: the coaches would have more empathy for the officials thereby reducing the number of conflicts between the coaches and officials. Conflicts between coaches and officials incites the spectators and teaches the students to disrespect authority.

Sincerely,

Victor D. Sletten

Victor D. Sletten
Superintendent

cc: Richard J. Anderson, MSBA

Independent School District No. 47

W. F. FURE, SUPERINTENDENT
DAVID A. BUCK, BUSINESS MANAGER
Sauk Rapids, Minnesota 56379

LYLE SENTZ, PRINCIPAL
SENIOR HIGH SCHOOL

JAMES LANGLOIS, ELEMENTARY DIRECTOR
EDWARD RIBICH, PRINCIPAL, PLEASANTVIEW
JERRY LEESE, PRINCIPAL, RICE

JOHN CLARK, PRINCIPAL
JUNIOR HIGH SCHOOL

December 3, 1980

George Droubie, Director
Personnel Licensing Section
Minnesota State Department of Education
616 Capitol Square Building
St. Paul, MN 55101

Dear Mr. Droubie:

I have reviewed the proposal for licensure of coaches and can strongly support the proposal.

I think that the grandpersoning clause and the hardship clause are absolutely essential in today's "market". Coaches at a level lower than head coach have been difficult to employ recently, and that situation may extend to the varsity level in the future.

I believe the qualifications for licensure are very reasonable.

Sincerely yours,

W. F. Fure
Superintendent

WFF;jn

GLENN MATEJKA, Superintendent
Phone: (218) 744-4380

JOE S. BUNCICH, Business Manager
Business Office (218) 744-4381

INDEPENDENT SCHOOL DISTRICT NO. 697

EVELETH, MINNESOTA 55734

December 2, 1980

Dr. George Droubie, Director
Personnel Licensing Section
Minnesota State Department of Education
6th Floor, Capitol Square Building
St. Paul, Minnesota 55101

Dear Dr. Droubie:

The administrators of the Eveleth School District have reviewed the working draft dated November, 1980, concerning the licensure of coaches. The working draft appears manageable for our school district. There may be some problems the first couple of years of implemenetation of the proposed rules with the so-called minor sports activities such as tennis, cross country and swimming.

In reference to swimming and because of the safety involved in swimming, an additional requirement should be considered that would state a swimming coach must also be a certified life guard and/or a water safety instructor.

Finally, we add that consideration for licensure for coaching should be given to professional athletes provided that the professional athlete meets the standards as stated in paragraph D-1. We feel that it would only be appropriate to consider professional athletes when we have four professional teams in Minnesota.

Sincerely,

Glenn Matejka

Glenn Matejka
Superintendent

GGM/em

cc: Richard J. Anderson
Director of Special Services, MSBA

Maynard Public Schools

INDEPENDENT SCHOOL DISTRICT NO. 127
MAYNARD, MINNESOTA 56260

CLETUS RAUSCH, Secondary Principal
Telephone 367-2396

HAROLD SATTERLUND, Superintendent
Telephone (612) 367-2397

FRED NOLAN, Elementary Principal
Telephone 367-2394



December 1, 1980

Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

The rough draft for coaches licensing has been reviewed and is generally found favorable. Please consider this letter an endorsement.

Sincerely,

H. Satterlund
Superintendent

Dr. James Tool, Supt.
Richard Smith, H. S. Prin.

Norm Bussian, M. S. Prin.
Bob Boyd, Elem. Prin.

WABASHA - KELLOGG
SCHOOL DISTRICT No. 811

611 Broadway
Wabasha, Minnesota 55981
612-565-3559



December 1, 1980

Dr. George Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie:

I am writing to you to make a few comments about the proposed rules for licensing athletic coaches.

I believe that the basic proposal is well thought out and is based on sound philosophy. The main difficulty that I can see with it is that the head A squad coach must always be a teacher. I agree that it is highly desireable to have the head coach and all other coaches as teachers on our staff. Unfortunately, we are seeing many of our experienced teachers turning away from coaching.

This year we have a RPN nurse as our head girls' gymnastic coach. Last year's coach is on a one year leave of absence. This nurse has a very extensive performance and coaching background and probably knows more than last year's coach.

The expansion of girls' athletics has resulted in a tremendous need to hire coaches at a time when many older teachers do not want to caoch and new teachers are not being hired.

I realize there is no easy solution to these problems. Thank you for allowing me the opportunity to express these thoughts.

Sincerely,

Jim Tool

Jim Tool,
Superintendent

cc:

Dick Anderson

ROGER MISSLING
CHAIRMAN

GARY SPILLUM
VICE CHAIRMAN

CAROLYN BONDHUS
CLERK

DAVID EIDEM
TREASURER

WALTER SCHOPER
DIRECTOR

ROBERT A. MEYER
DIRECTOR

STORDEN-JEFFERS

INDEPENDENT SCHOOL DISTRICT NO. 178

STORDEN, MINNESOTA 56174
JEFFERS, MINNESOTA 56145

CRAIG L. BANGSTON
SUPERINTENDENT
STORDEN

DONALD LUND
HIGH SCHOOL PRINCIPAL
JEFFERS

ELEMENTARY PRINCIPAL
STORDEN

November 26, 1980

Dr. George B. Droubie, Manager
Personnel Licensing & Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Dr. Droubie,

I have reviewed the latest draft of the proposed coaching rule and have also discussed this with our coaching staff. We feel this proposal is satisfactory and workable.

Sincerely,

Don Lund

Don Lund
High School Principal/Athletic Director



INDEPENDENT DISTRICT #297

SPRING GROVE, MINNESOTA 55974

V.E. LEWIS, SUPERINTENDENT

507 - 498-3221

November 26, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Sir:

In reference to your request for comments concerning the proposed regulations on the licensure of head varsity coaches for each sport in senior high school athletics.

It appears to be a positive step forward in the jungle of licensure. I believe it is most practical that head coaches have some training; and, although, the optimum situation would be to have fully licensed, accredited and trained personnel for all levels of coaching.

The proposal as presented to me which was entitled "Working Draft" from the Personnel Licensing and Placement Division of Special Services appears to be acceptable and meets our approval.

Sincerely yours,

V.E. Lewis
Superintendent

VEL:ssl

ST. PETER PUBLIC SCHOOLS

INDEPENDENT SCHOOL DISTRICT NO. 508

ST. PETER, MINNESOTA 56082

L.R. SWARTWOOD, SUPERINTENDENT

Junior-Senior High School Office
Telephone 507-931-4210

District Administration Office
Telephone 507-931-5703

November 26, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear George:

The two athletic directors and I have reviewed the proposed licensure for head varsity coaches of interscholastic sports, and we agree that the proposal is acceptable to us.

Sincerely,

Les Swartwood

L. R. Swartwood
Superintendent

LRS:aw

cc: MSBA

Arlington-Green Isle Public Schools

INDEPENDENT SCHOOL DISTRICT 731

Arlington, Minnesota 55307

OFFICERS

Michael Dooner, Chairman
Louis Woehler, Vice Chairman
Wayne Kramer, Clerk
Ralph Thomes, Treasurer

DIRECTORS

Donald Ziegler
Richard Nagel
Allan Zeiher

TELEPHONE 964-2292
TEL. AREA CODE 612

GEORGE F. MACA
Superintendent

DENNIS BERGNER
High School Principal

ZELORA LENTZ
Elementary Principal

November 26, 1980



Dr. George B. Droubie, Manager
Personnel Licensing and Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Dear Dr. Droubie:

I have reviewed the proposed rule regarding licensure of coaches with the Athletic Director of our school district. It is our belief that the proposal is a workable one. We feel that the head coach should be a licensed teacher.

The proposal allows for consideration of hardship cases. At the present time this provision would appear to be satisfactory. Circumstances will change with time. Teacher supply and demand as well as the availability could have an effect in later years.

As it stands we favor the proposed rule. We feel it is reasonable at the present time under current conditions.

Sincerely yours,

George F. Maca
Superintendent

cc: Richard J. Anderson, MSBA

js

OFFICERS
Gerald Hoeft, Chairman
Larry Sandberg, Vice Chm.
Elmer Plante, Clerk
Paul Stennes, Treasurer

Erskine Public School
INDEPENDENT DISTRICT 597
DONALD E. GRINOLDS, Superintendent
NEVIN DUNCAN, H.S. Principal
ERSKINE, MINNESOTA 56535

DIRECTORS
Esther Pries
Sheldon Clay
Glenn Kangas



November 25, 1980

Dr. George B. Droubie, Manager
Personnel Licensing & Placement
610 Capitol Square Building
550 Cedar Street
St. Paul, MN 55101

Dear Mr. Droubie:

I agree wholeheartedly to the working draft of "license for head coaches."

Sincerely,

Donald E. Grinolds

Donald E. Grinolds
Superintendent

jr

BOARD OF EDUCATION
KENNETH SOMMERFIELD
DAVID KRANZ
DUANE WINDHORST, TREASURER

Mazeppa Public Schools

INDEPENDENT SCHOOL DISTRICT NO. 809

Mazeppa, Minnesota 55956

FRED L. WARWEG
SUPERINTENDENT/HIGH SCHOOL PRINCIPAL
JOSEPH J. HAMPL
ELEMENTARY PRINCIPAL/ADMINISTRATIVE ASSISTANT

BOARD OF EDUCATION
EARL POTTORFF, CHAIRMAN
JUDITH FIERST, CLERK
JAMES MARTIN, VICE-CHAIRMAN



November 25, 1980

Dear George:

I support the enclosed draft for licensing head varsity coaches of interscholastic athletics. It appears to me to be workable and fair.

Sincerely,

Fred L. Warweg
Supt./H.S. Princ.

Enc.

STATE OF MINNESOTA

OFFICE OF ADMINISTRATIVE HEARINGS

ROOM 300 – 1745 UNIVERSITY AVENUE
ST. PAUL, MINNESOTA 55104
(612) 296-6910

May 13, 1981

Ms. Lois Steinhaus
Education Statistics Division
Department of Education
Seventh Floor, Capitol Square Building
St. Paul, Minnesota 55101

RE: In the Matter of Proposed Adoption of a Rule of the State Board of Education Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools 5 MCAR Sec. 1.0533.
HE Docket No. EDU-81-002-PE

Dear Ms. Steinhaus:

I enclose herewith and serve upon you by mail the Report of the Hearing Examiner in the above-entitled matter together with the official record, and I am closing our file in this case. The Report of the Chief Hearing Examiner is also included with my Report.

I am also certifying the official transcript to your office.

Yours very truly,

Peter C. Erickson

PETER C. ERICKSON
Hearing Examiner
(612) 296-8118

PCE/eag
Encs.
CC:1 - Ms. Sheila Fishman, Special Assistant Attorney General
CC:2 - Dr. Gregory J. Waddick, Assistant Commissioner
CC:3 - Dr. George B. Droubie, Manager, Personnel Licensing Emplacement

AN EQUAL OPPORTUNITY EMPLOYER

STATE OF MINNESOTA)
(ss.
COUNTY OF RAMSEY)

AFFIDAVIT OF SERVICE

Eileen A. Gaiovnik, being first duly sworn, deposes and says that on the 13th day of May, 1981, at the City of St. Paul, County of Ramsey, State of Minnesota, she served the attached Report of the Chief Hearing Examiner and the Report of the Hearing Examiner EDU-81-002-PE unstamped, by placing in the designated tray to be collected by messenger for delivery to the central mailing station as required by Minn. Stat. § 16.54 (1974), a true and correct copy thereof on all persons at the addresses shown on the attached mailing list.

Eileen A. Gaiovnik

Subscribed and sworn to before me this
13th day of May, 1981.

Susan C. Wojcik

SUSAN C. WOJCIK
NOTARY PUBLIC-MINNESOTA
RAMSEY COUNTY
My Commission Expires April 26, 1986

Ms. Lois Steinhaus
Education Statistics Division
Department of Education
7th Floor, Capitol Square Building
St. Paul, Minnesota 55101

Ms. Sheila Fishman
Special Assistant Attorney General
1100 Bremer Tower
7th Place and Minnesota Street
St. Paul, Minnesota 55101

Dr. Gregory J. Waddick
Assistant Commissioner
Department of Education
7th Floor, Capitol Square Building
St. Paul, Minnesota 55101

Dr. George B. Droubie
Manager, Personnel Licensing Emplacement
Department of Education
7th Floor, Capitol Square Building
St. Paul, Minnesota 55101

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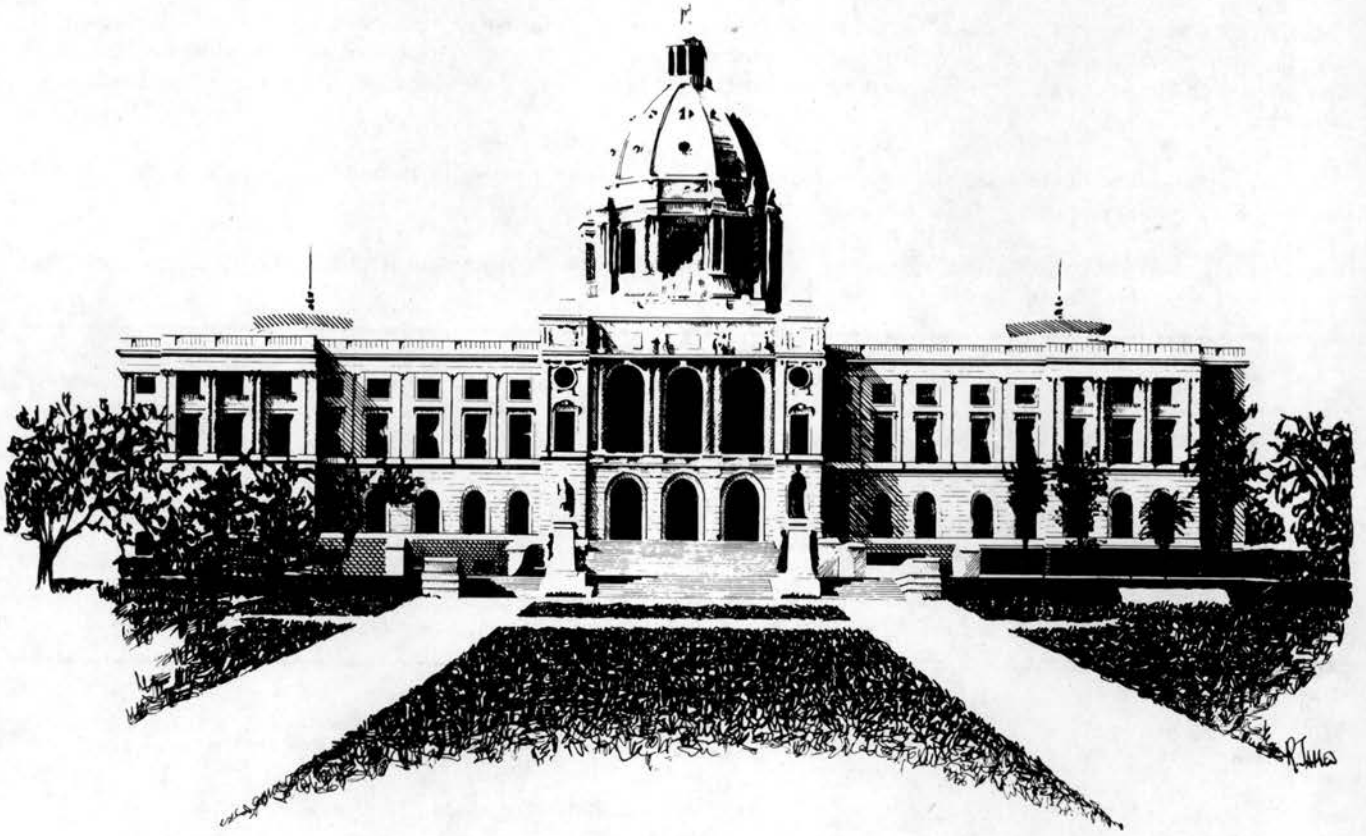
STATE REGISTER

STATE OF MINNESOTA



VOLUME 5, NUMBER 34

February 23, 1981

Pages 1287-1314

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STATE REGISTER

Printing Schedule for Agencies

Issue Number	*Submission deadline for Executive Orders, Adopted Rules and **Proposed Rules	*Submission deadline for State Contract Notices and other **Official Notices	Issue Date
	SCHEDULE FOR VOLUME 5		
35	Friday Feb 13	Monday Feb 23	Monday Mar 2
36	Monday Feb 23	Monday Mar 2	Monday Mar 9
37	Monday Mar 2	Monday Mar 9	Monday Mar 16
38	Monday Mar 9	Monday Mar 16	Monday Mar 23

*Deadline extensions may be possible at the editor's discretion; however, none will be made beyond the second Wednesday (12 calendar days) preceding the issue date for rules, proposed rules and executive orders, or beyond the Wednesday (5 calendar days) preceding the issue date for official notices. Requests for deadline extensions should be made only in valid emergency situations.

**Notices of public hearings on proposed rules and notices of intent to adopt rules without a public hearing are published in the Proposed Rules section and must be submitted two weeks prior to the issue date.

Instructions for submission of documents may be obtained from the Office of the State Register, 506 Rice Street, St. Paul, Minnesota 55103, (612) 296-0930.

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The *State Register* is the official publication of the State of Minnesota, containing executive orders of the governor, proposed and adopted rules of state agencies, and official notices to the public. Judicial notice shall be taken of material published in the *State Register*.

Albert H. Quie
Governor

James J. Hiniker, Jr.
Commissioner
Department of Administration

Stephen A. Ordahl
Director
State Register and
Public Documents Division

Carol Anderson Porter
Editor

Paul Hoffman, Robin PanLener
Editorial Staff

Roy Schmidtke
Circulation Manager

Cindy Peterson
Secretary

David Zunker
Information Officer

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NOTICE

How to Follow State Agency Rulemaking Action in the *State Register*

State agencies must publish notice of their rulemaking action in the *State Register*. If an agency seeks outside opinion before promulgating new rules or rule amendments, it must publish a **NOTICE OF INTENT TO SOLICIT OUTSIDE OPINION.** Such notices are published in the **OFFICIAL NOTICES** section. Proposed rules and adopted rules are published in separate sections of the magazine.

The PROPOSED RULES section contains:

- Calendar of Public Hearings on Proposed Rules.
- Proposed new rules (including Notice of Hearing and/or Notice of Intent to Adopt Rules without A Hearing).
- Proposed amendments to rules already in existence in the Minnesota Code of Agency Rules (MCAR).
- Proposed temporary rules.

The ADOPTED RULES section contains:

- Notice of adoption of new rules and rule amendments (those which were adopted without change from the proposed version previously published).
- Adopted amendments to new rules or rule amendments (changes made since the proposed version was published).
- Notice of adoption of temporary rules.
- Adopted amendments to temporary rules (changes made since the proposed version was published).

All ADOPTED RULES and ADOPTED AMENDMENTS TO EXISTING RULES published in the *State Register* will be published in the Minnesota Code of Agency Rules (MCAR). Proposed and adopted TEMPORARY RULES appear in the *State Register* but are not published in the MCAR due to the short-term nature of their legal effectiveness.

The *State Register* publishes partial and cumulative lisitngs of rule action in the MCAR AMENDMENTS AND ADDITIONS list on the following schedule:

Issues 1-13, inclusive
Issues 14-25, inclusive
Issue 26, cumulative for 1-26
Issue 27-38, inclusive
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PROPOSED RULES

Pursuant to Minn. Laws of 1980, § 15.0412, subd. 4h, an agency may propose to adopt, amend, suspend or repeal rules without first holding a public hearing, as long as the agency determines that the rules will be noncontroversial in nature. The agency must first publish a notice of intent to adopt rules without a public hearing, together with the proposed rules, in the *State Register*. The notice must advise the public:

1. that they have 30 days in which to submit comment on the proposed rules;
2. that no public hearing will be held unless seven or more persons make a written request for a hearing within the 30-day comment period;
3. of the manner in which persons shall request a hearing on the proposed rules;

and

4. that the rule may be modified if modifications are supported by the data and views submitted.

If, during the 30-day comment period, seven or more persons submit to the agency a written request for a hearing of the proposed rules, the agency must proceed under the provisions of § 15.0412, subds. 4 through 4g, which state that if an agency decides to hold a public hearing, it must publish in the *State Register* a notice of its intent to do so. This notice must appear at least 30 days prior to the date set for the hearing, along with the full text of the proposed rules. (If the agency has followed the provisions of subd. 4h and has already published the proposed rules, a citation to the prior publication may be substituted for republication.)

Pursuant to Minn. Stat. § 15.0412, subd. 5, when a statute, federal law or court order to adopt, suspend or repeal a rule does not allow time for the usual rulemaking process, temporary rules may be proposed. Proposed temporary rules are published in the *State Register*, and for at least 30 days thereafter, interested persons may submit data and views in writing to the proposing agency.

State Board of Education
Department of Education
Special and Compensatory Education Division

Proposed Rules Governing Standards and Procedures of Special Education Instruction and Services for Children and Youth Who Are Handicapped (5 MCAR § 1.0127 A.5.e.(3))

Notice of Hearing

A public hearing concerning the proposed rule amendment will be held at the Veteran Services Building, Room D, 20 W. 12th Street, Columbus Avenue, St. Paul, MN 55155 on April 3, 1981, commencing at 9:00 a.m. The proposed rule may be modified as a result of the hearing process. Therefore, if you are affected in any manner by the proposed rule, you are urged to participate in the rule hearing process.

Following the agency's presentation at the hearing all interested or affected persons will have an opportunity to ask questions and make comments. Statements may be made orally and written material may be submitted. In addition, whether or not an appearance is made at the hearing, written statements or material may be submitted to Jon Lunde, Hearing Examiner, Room 300, 1745 University Avenue, St. Paul, MN 55104, telephone (612) 296-5938 either before the hearing or within five working days after the close of the hearing. The hearing examiner may, at the hearing, order that the record be kept open for a longer period not to exceed 20 calendar days. The rule hearing procedure is governed by Minn. Stat. §§ 15.0411-15.0417 and 15.052, and by 9 MCAR §§ 2.101-2.113 (Minnesota Code of Agency Rules). If you have any questions about the procedure, call or write the hearing examiner.

Notice is hereby given that 25 days prior to the hearing, a Statement of Need and Reasonableness will be available for review at the agency and at the Office of Administrative Hearings. This Statement of Need and Reasonableness will include a summary of all the evidence and argument which the agency anticipates presenting at the hearing justifying both the need for and the reasonableness of the proposed rule or rules. Copies of the Statement of Need and Reasonableness may be obtained from the Office of Administrative Hearings at a minimal charge.

The purpose of the rule is to determine whether an independent assessment requested by the parents will be at public expense. The agency intends to present only a short summary of the Statement of Need and Reasonableness at the hearing but will answer questions raised by interested persons. You are therefore urged to review the Statement of Need and Reasonableness before the hearing. Additional copies will be available at the hearing.

KEY: PROPOSED RULES SECTION — Underlining indicates additions to existing rule language. ~~Strike outs~~ indicate deletions from existing rule language. If a proposed rule is totally new, it is designated "all new material." ADOPTED RULES SECTION — Underlining indicates additions to proposed rule language. ~~Strike outs~~ indicate deletions from proposed rule language.

The board's statutory authority to promulgate the proposed rules is provided by Minn. Stat. 120.17, subd. 3.

The board estimates that there will be limited cost to local bodies in the state to implement the rule for the two years immediately following its adoption within the meaning of Minn. Stat. § 15.0412, subd. 7 (1978).

A copy of the proposed rules is attached hereto. One free copy may be obtained by writing to Wayne A. Erickson, Capitol Square Building, 550 Cedar Street, St. Paul, MN 55101. Additional copies will be available at the door on the date of the hearing. If you have any questions on the content of the proposed rule, contact Wayne A. Erickson at (612) 296-4163.

Notice: Any person may request notification of the date on which the Hearing Examiner's Report will be available, after which date the board may not take any final action on the rules for a period of five 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. If you desire to be so 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 Hearing Examiner's Report, or to the board, in the case of the Board's submission or resubmission to the Attorney General.

Minn. Stat. ch. 10A requires each lobbyist to register with the State Ethical Practices Board within five days after he or she commences lobbying. A lobbyist is defined in Minn. Stat. § 10A.01, subd. 11 (1979 Supp.) 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 one month or more than $250, not including his own 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 his own 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.

The statute provides certain exceptions. Questions should be directed to the Ethical Practices Board, 41 State Office Building, St. Paul, MN 55155, telephone (612) 296-5615.

January 12, 1981

Howard B. Casmey, Secretary
State Board of Education

Amendment as Proposed

Chapter Seven: Standards and Procedures for the Provision of Special Education Instruction and Services for Children and Youth Who Are Handicapped

5 MCAR § 1.0127 Formal notice to parents.

A. General notice provisions.

5. All notices must be sufficiently detailed and precise to constitute adequate notice for hearing of the proposed action and contain a full explanation of all of the procedural safeguards available to parents under the provision of these rules. All notices must:

e. inform the parents that they may:

(1) obtain an independent assessment at their own expense;

(2) request from the district information about where an independent assessment may be obtained;

(3) ~~request that~~ obtain an independent assessment ~~be conducted~~ at public expense ~~in which case the district has the option of denying such a request. When a district denies such a request, the parents may request a conciliation conference and due process hearing to resolve the disagreement~~. However, a district may initiate a due process hearing to show that its assessment is appropriate. If the final decision is that its assessment is appropriate, the parents still have the right to an independent assessment, but not at public expense.

State Board of Education
Department of Education
Special Services Division

Proposed Rule Governing Licensure Requirements for Head Varsity Coaches of Interscholastic Sports in Senior High Schools (5 MCAR § 1.0533)

Notice of Hearing

A public hearing concerning the proposed rule will be held at Veterans Service Building, Room D, 20 West 12th Street and Columbus Avenue, St. Paul, Minnesota 55155 on April 2, 1981, commencing at 9:00 a.m. The proposed rule may be modified as a result of the hearing process. Therefore, if you are affected in any manner by the proposed rule, you are urged to participate in the rule hearing process.

Following the agency's presentation at the hearing all interested or affected persons will have an opportunity to ask questions and make comments. Statements may be made orally and written material may be submitted. In addition, whether or not an appearance is made at the hearing, written statements or material may be submitted to Peter Erickson, Hearing Examiner, Room 300, 1745 University Avenue, St. Paul, MN 55104, telephone (612) 296-8118 either before the hearing or within five working days after the close of the hearing. The hearing examiner may, at the hearing, order that the record be kept open for a longer period not to exceed 20 calendar days. The rule hearing procedure is governed by Minn. Stat. §§ 15.0411-15.0417 and 15.052, and by 9 MCAR §§ 2.101-2.113 (Minnesota Code of Agency Rules). If you have any questions about the procedure, call or write the hearing examiner.

Notice is hereby given that 25 days prior to the hearing, a Statement of Need and Reasonableness will be available for review at the agency and at the Office of Administrative Hearings. This Statement of Need and Reasonableness will include a summary of all the evidence and argument which the agency anticipates presenting at the hearing justifying both the need for and the reasonableness of the proposed rule or rules. Copies of the Statement of Need and Reasonableness may be obtained from the Office of Administrative Hearings at a minimal charge.

The board's statutory authority to promulgate the proposed rules is provided by Minn. Stat. § 125.05, as amended by Laws of 1980, ch. 345, § 2.

The board estimates that there will be no cost to local bodies in the state to implement the rule for the two years immediately following its adoption within the meaning of Minn. Stat. § 15.0412, subd. 7 (1978).

A copy of the proposed rules is attached hereto. One free copy may be obtained by writing to George B. Droubie, Capitol Square Building, 550 Cedar Street, St. Paul, MN 55101. Additional copies will be available at the door on the date of the hearing. If you have any questions on the content of the proposed rule, contact George B. Droubie.

Notice: Any person may request notification of the date on which the Hearing Examiner's Report will be available, after which date the Board may not take any final action on the rules for a period of five 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. If you desire to be so 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 Hearing Examiner's Report, or to the board, in the case of the board's submission or resubmission to the Attorney General.

Minn. Stat. ch. 10A requires each lobbyist to register with the State Ethical Practices Board within five days after he or she commences lobbying. A lobbyist is defined in Minn. Stat. § 10A.01, subd. 11 (1979 Supp.) 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 one month or more than $250, not including his own 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 his own traveling expenses and membership dues, in any year, for the purpose

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of attempting to influence legislative or administrative action by communicating or urging others to communicate with public officials.

The statute provides certain exceptions. Questions should be directed to the Ethical Practices Board, 41 State Office Building, St. Paul, MN 55155, telephone (612) 296-5615.

January 12, 1981

Howard B. Casmey, Secretary
State Board of Education

Rule as Proposed (all new material)

Chapter Twenty-Seven A: Licensure of Supervisory and Support Personnel; Issuance, Suspension, and Revocation

5 MCAR § 1.0533 Head varsity coaches of interscholastic sports in senior high schools.

A. Applicability. Every senior high school shall have a licensed head varsity coach for each interscholastic sport except as otherwise provided in C., below. Each person who is employed and functions as a head varsity coach of an interscholastic sport in a senior high school shall hold a valid Minnesota teaching license and shall satisfactorily complete a preparation program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches of interscholastic sports.

B. Definitions. For purposes of this rule, the following definitions shall apply:

1. Head varsity coach. The teacher who has the primary responsibility for a senior high school varsity interscholastic sport.

2. Interscholastic sports. A sport in which there is scheduled competition with athletic teams of another school within and outside the school district.

3. Senior high school. A secondary school consisting of grades 10-12 or grades 9-12 in a four-year secondary school and grades 9-12 in six-year secondary schools.

C. Scope. Nothing in this rule shall prohibit a school district from employing an unlicensed person as assistant to a licensed head varsity coach of an interscholastic sport or to coach a junior high school sport.

D. Qualifications for licensure. All candidates recommended for licensure as a head varsity coach of interscholastic sports shall have satisfactorily completed a program approved by the Minnesota Board of Education consisting of a maximum of 12 quarter or 9 semester hours containing components designed to provide candidates recommended for licensure with knowledge, skills, and understandings in all of the following areas:

1. First aid and prevention and care of athletic injuries.

2. Science of sports, including principles of anatomy and kinesiology and principles of exercise physiology.

3. Theory and practice of sports techniques.

4. Psychology of sports and coaching.

5. Satisfactory completion of a supervised field experience in coaching consisting of no fewer than 40 clock hours.

E. Alternative route to licensure. A school district may contract with Minnesota colleges and universities which offer approved programs leading to the licensure of head varsity coaches to develop jointly the program of instruction outlined above. Such jointly developed programs must be approved by the Minnesota Board of Education. Recommendation of candidates for head varsity coaching licensure shall be the responsibility of the college or university through which the program was developed.

F. Teachers employed as head varsity, assistant, or junior high school coaches prior to July 1, 1982. A person holding a valid Minnesota teaching license who, prior to the effective date of this rule, is currently employed or was previously employed as a head varsity, assistant, or junior high school coach, as verified by the superintendent of schools of the school district employing the coach, and who can provide verification of completion of six quarter hours or 60 clock hours of instruction in first aid and the prevention and care of athletic injuries shall, upon application, be issued a license as head varsity coach of interscholastic sports.

G. Effective date. The provisions of this rule are effective on July 1, 1982, for applicants for the initial license as a head varsity coach of interscholastic sports.

H. School district hardship situations. In cases where a local school district is unable to employ a licensed head varsity coach of interscholastic sports, the superintendent of such school district may request the commissioner of education to grant a provisional license for one school year and renewable for a maximum of one additional school year to a teacher to serve as a head varsity coach of an interscholastic sport upon evidence submitted by the superintendent of schools that the following conditions have been met:

1. Evidence that the school district is unable to employ a licensed head varsity coach of interscholastic sports for the current school year, and

2. The person to be employed under such authorization holds a current, valid Minnesota teaching license, and

3. The person to be employed under such authorization is currently enrolled in a program approved by the Minnesota Board of Education leading to the licensure of head varsity coaches of interscholastic sports.

I. Licenses as head varsity coaches shall be renewed according to provisions of 5 MCAR § 3.005 continuing education/relicensure.

State Board of Education
Department of Education
Special Services Division

Proposed Rules Governing Prohibition of Discriminatory Practices in Athletic Programs in Public and Private Elementary and Secondary Schools (5 MCAR §§ 1.0667-1.0672)

Notice of Hearing

A public hearing concerning the proposed rules will be held at the Veterans Service Building, Room D, 20 West 12th Street and Columbus Avenue, St. Paul, Minnesota 55155 on March 27, 1981, commencing at 9:00 a.m. The proposed rules may be modified as a result of the hearing process. Therefore, if you are affected in any manner by the proposed rules, you are urged to participate in the rule hearing process.

Following the agency's presentation at the hearing all interested or affected persons will have an opportunity to ask questions and make comments. Statements may be made orally and written material may be submitted. In addition, whether or not an appearance is made at the hearing, written statements or material may be submitted to George Beck, Hearing Examiner, Room 300, 1745 University Avenue, St. Paul, Minnesota 55104, telephone (612) 296-8108 either before the hearing or within five working days after the close of the hearing. The hearing examiner may, at the hearing, order that the record be kept open for a longer period not to exceed 20 calendar days. The rule hearing procedure is governed by Minn. Stat. §§ 15.0411-15.0417 and 15.052, and by 9 MCAR §§ 2.101-2.113 (Minnesota Code of Agency Rules). If you have any questions about the procedure, call or write the hearing examiner.

Notice is hereby given that 25 days prior to the hearing, a Statement of Need and Reasonableness will be available for review at the agency and at the Office of Administrative Hearings. This Statement of Need and Reasonableness will include the evidence and argument which the agency anticipates presenting at the hearing justifying both the need for and the reasonableness of the proposed rule or rules. The agency intends to present only a short summary of the Statement of Need and Reasonableness at the hearing but will answer questions raised by interested persons. You are therefore urged to review the Statement of Need and Reasonableness before the hearing. Additional copies will be available at the hearing. Copies of the Statement of Need and Reasonableness may be obtained from the Office of Administrative Hearings at a minimal charge.

The board's statutory authority to promulgate the proposed rules is provided by Minn. Stat. § 126.21, subd. 5 as amended by Laws of 1980, ch. 355, § 1.

The board estimates that there will be no cost to local bodies in the state to implement the rule for the two years immediately following its adoption within the meaning of Minn. Stat. § 15.0412, subd. 7 (1978).

A copy of the proposed rules is attached hereto. One free copy may be obtained by writing to the State Department of Education, Capitol Square Building, 550 Cedar Street, St. Paul, Minnesota 55101. Additional copies will be available at the door on the date of the hearing. If you have any questions on the content of the proposed rule, contact Dr. Greg Waddick or Archie Holmes, 296-5061 or 296-5020.

Notice: Any person may request notification of the date on which the Hearing Examiner's Report will be available, after which date the board may not take any final action on the rules for a period of five working days. Any person may request

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notification of the date on which the hearing record has been submitted or resubmitted to the Attorney General by the board. If you desire to be so 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 Hearing Examiner's Report, or to the board, in the case of the board's submission or resubmission to the Attorney General.

Minn. Stat. ch. 10A requires each lobbyist to register with the State Ethical Practices Board within five days after he or she commences lobbying. A lobbyist is defined in Minn. Stat. § 10A.01, subd. 11 (1979 Supp.) 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 one month or more than $250, not including his own 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 his own 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.

The statute provides certain exceptions. Questions should be directed to the Ethical Practices Board, 41 State Office Building, St. Paul, Minnesota 55155, telephone (612) 296-5615.

January 12, 1981

Howard B. Casmey, Secretary
State Board of Education

Rules as Proposed (all new material)

Chapter Thirty-Three: Prohibition of Discriminatory Practices in Education

5 MCAR § 1.0667 Athletic programs. Authority, scope and purpose. These rules are promulgated pursuant to Minn. Stat. § 126.21, subd. 5, as amended by Laws of 1980, ch. 355, § 1. These rules apply to both public and private elementary and secondary schools that operate athletic programs.

5 MCAR § 1.0668 Definitions. All the words below shall have the meaning herein ascribed to them:

A. "Athletic program"—Means all interscholastic and intramural sports offered to students by public and private elementary and secondary educational institutions.

B. "Interscholastic athletic program"—Means all athletic activities offered within a school the purpose of which is to provide opportunities for students to compete with other students on like teams in other schools within an organized conference under the auspices of the Minnesota State High School League or with other like teams in other schools operating under separate jurisdictions.

C. "Intramural athletic program"—Means all non-interscholastic athletic activities offered within a school, which are not a part of the regular physical education curriculum, designed to provide students athletic opportunities, experiences and the development of competencies in a variety of sports.

D. "Participate"—Means for interscholastic sports, a student has been selected by the coach to be a member of a particular athletic team, inclusive of both varsity and junior varsity teams, after the try-out period has ended.

E. "Participation rate for a particular sex in the interscholastic athletic program"—Means the ratio of the number of participants of that sex in the athletic program to the number of students of that sex in the student body.

F. "Participation rate for a particular sex in the intramural athletic program"—Means the ratio of the number of participants of that sex in the athletic program to the number of students of that sex in the student body.

5 MCAR § 1.0669 Separation by teams.

A. Athletic programs for students in the seventh grade or above may include one or more teams limited to participants of one sex whose overall athletic opportunities have previously been limited. Athletic programs for students in the sixth grade or below may contain one or more teams which are limited to participants of one sex whose overall athletic opportunities have previously been limited and who by demonstrated interest indicate a desire to participate on a team restricted to members of that sex.

B. Any public or private elementary or secondary school may provide in the same sport two teams which are separated according to sex when overall athletic opportunities for one sex have previously been limited, but the team for the other sex may only be substantially separated by sex.

C. When overall athletic opportunities for one sex have previously been limited, members of that sex shall be permitted to try out and, if successful, to participate on any team in any sport. This rule does not prohibit any elementary or secondary school from making participation on a team in a sport dependent upon a demonstrated level of skill and ability.

D. When an educational institution has established a team exclusively for members of the sex whose overall athletic opportunities have previously been limited, members of the other sex may not try out for or participate on that team.

E. When an equal opportunity to participate is not provided to members of a sex whose overall athletic opportunities to participate have previously been limited, the school shall provide separate teams for the excluded sex in sports which will provide equal opportunity and accommodate their demonstrated interest.

5 MCAR § 1.0670 Duties of schools; penalty for failure to comply.

A. Public and private elementary and secondary schools shall provide equal opportunity for members of each sex to participate in both their intramural and interscholastic athletic program by responding to the following considerations:

1. A biennial determination of student demonstrated interest is to be conducted by use of a methodology the nature of which will be reported to the Department of Education in conjunction with the report required by 5 MCAR § 1.0671. The first biennial determination shall be made prior to the end of the 1981-82 school year.

Student demonstrated interest shall be considered in the selection of those athletic activities to be provided in the athletic program for the purpose of providing separate teams or sports for members of the previously excluded sex.

2. The number of opportunities for females to participate on teams is to be comparable to the number of opportunities for males to participate on teams in each school year in the interscholastic athletic program and comparable, as well as in the intramural athletic program.

3. The equipment, supplies and uniforms for each sport are to be comparable for both sexes.

4. The locker rooms, practice, and competitive facilities are to be comparable for both sexes.

5. The medical services are to be comparable for both sexes.

6. The participation rates for members of both sexes are to be comparable while recognizing the voluntary nature of student involvement in interscholastic and intramural athletics.

B. When two teams in the same sport are provided pursuant to 5 MCAR § 1.0669 A., the two teams shall be treated in a substantially equal manner. Public and private elementary and secondary schools shall accomplish this by providing that:

1. equipment, supplies, and uniforms for each team are comparable.

2. the games and competitive events for each team are scheduled so that the number of opportunities to perform before an audience are comparable.

3. the practice sessions and competitive events scheduled for each team are at equally desirable time periods.

4. the travel and per diem allowances per participant are comparable.

5. coaching for members of each team is comparable.

6. the locker rooms, practice, and competitive facilities for each team are comparable.

7. the medical services for each team are comparable.

8. the publicity produced by the school for each team is comparable.

9. the expenditure, excluding salary of the coach, per participant on each team is substantially equal. Per participant expenditure excludes gate receipts and other revenues generated by that sport. When an item or items of expense are not separated, the expense shall be prorated to the teams according to the number of participants.

C. The penalty for noncompliance with these rules by public elementary and secondary schools shall be the reduction of State Aids pursuant to procedures of Minn. Stat. § 124.15, subd. 3. In addition, nothing in these rules shall be interpreted as limiting the authority of the Human Rights Department over public and nonpublic schools and noncompliance may constitute a violation of Minn. Stat. ch. 363, Human Rights Act.

5 MCAR § 1.0671 Compliance reports and submission of data. Annually, on or before October 15, each school/school district shall submit to the Commissioner of Education an elementary and secondary athletic program report containing information about both intramural and interscholastic athletics provided. The report shall contain by building: (a) number of sports offered for each sex, (b) the season each sport is offered for each sex, (c) the number of weeks each sport is offered, (d) the number of

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teams in each sport, (e) the number of coaches assigned each sport, (f) the number of students by sex participating in each sport, (g) the dollar expenditure per sport and, (h) the total unduplicated count of student participation in the athletic program by sex.

5 MCAR § 1.0672 Duties of the Commissioner of Education. Upon receipt of an educational institution's athletic program report, the Commissioner of Education shall:

A. Evaluate the data contained in the report.

B. Forward reports requiring additional attention to the Commissioner of Human Rights, pursuant to Minn. Stat. § 124.15, subd. 2a.

Energy Agency
Alternative Energy Development Division

Proposed Temporary Rule Governing Certification of Solar Collectors to Qualify Renewable Energy Source Expenditures for the Minnesota Individual Income Tax Residential Energy Credit

Temporary Rule as Proposed

6 MCAR § 2.1500 Solar collector certification. Any solar collector included in a renewable energy source expenditure after December 31, 1980, shall be deemed certified by the Minnesota Energy Agency for purposes of Minn. Stat. § 290.06, subd. 14 (1980), so long as the expenditure qualifies for the federal renewable energy source residential credit of Section 44C of the Internal Revenue Code of 1954 (26 U.S.C. § 44C), as amended through December 31, 1978, and any regulation promulgated pursuant thereto. **[A Request for Public Comment on this proposed temporary rule appears in this issue, at page 1305.]**

Department of Public Welfare
Mental Health Bureau

Proposed Temporary Rule Governing Approval of Mental Health Centers and Clinics for Insurance Reimbursement

Request for Public Comment

Notice is hereby given that the Department of Public Welfare has proposed the following temporary rule for the purpose of implementing the provisions of Laws of Minnesota, 1980, Chapter 506, standards for approval of mental health agencies for insurance reimbursement; as authorized by Minn. Stat. § 15.0412, subd. 5 (1977), pending completion of a full hearing and adoption of a permanent rule.

All interested persons are hereby afforded the opportunity to submit their comments on the proposed rule for 20 days immediately following publication of this material in the State Register by writing to Trudy Dunham, Insurance Reimbursement Specialist, Mental Health Bureau, Department of Public Welfare, 4th Floor, Centennial Office Building, Saint Paul, Minnesota 55155. The temporary rule may be revised on the basis of comments received. Any written material received shall become part of the record in the final adoption of the temporary rule.

Arthur E. Noot
Commissioner of Public Welfare

Temporary Rule as Proposed (all new material)

DPW Temporary Rule 29

A. Statutory Citation

B. Purpose

C. Applicability

D. Definitions

E. Minimum Standards

1. Treatment
2. Quality Assurance
3. Staffing

F. Approval Procedures

1. Application

2. Review

3. Method of Approval/Disapproval

4. Appeals

G. Application Fee

H. Duration of Approval

DPW Temporary Rule 29 (12 MCAR § 2.029) Standards for approval of mental health centers and clinics for insurance reimbursement.

A. Statutory citation. The authority for this rule is Chapter 506, Laws of Minnesota, 1980, codified as Minn. Stat. § 245.69, subd. 2.

B. Purpose. The purpose of this rule is to establish minimum standards for approval of public and private mental health centers and public and private mental health clinics in accordance with the authorizing statute and with Minn. Stat. § 62A.152, subd. 2, which requires certain group insurance policies and plans to provide benefits to covered persons for outpatient mental illness consultative, diagnostic, and treatment services.

C. Applicability.

1. This rule applies to those public and private mental health centers and public and private mental health clinics which seek the approval of the Commissioner of Public Welfare for purposes of group health insurance or subscriber contract reimbursement under the terms and provisions of this rule. This rule does not apply to the individual office practice of physicians or licensed consulting psychologists, or to licensed hospitals.

2. The provisions of this rule shall be severable. If any clause, sentence, or provision is declared illegal or of no effect, the validity of the remainder of this rule and its applicability shall not be affected.

3. Any provision of this rule inconsistent with any applicable state or federal law is superseded by that law.

4. Approval of a mental health center or mental health clinic under this rule does not convey or imply approval of a staff member of such facility to claim reimbursement from Medical Assistance or other third party payors when practicing privately. Approval of a mental health center or mental health clinic under this rule does not convey or imply approval of such facility to claim reimbursement from Medical Assistance.

5. Approval of a mental health center or mental health clinic under this rule constitutes approval only for purposes of Minn. Stat. § 62A.152, subd. 2. Approval shall not be construed as endorsement or accreditation by the Department of Public Welfare.

D. Definitions.

1. Application: The formal request by a mental health center or mental health clinic to the commissioner on the forms created for this purpose, to be recognized as meeting the requirements of Minn. Stat. § 245.69, subd. 2 and this rule, and therefore eligible to claim reimbursement for outpatient clinical services to persons with mental illness covered by group health insurance policies or subscriber contracts under the terms of Minn. Stat. § 62A.152.

2. Approval: The determination by the commissioner and written notice to the applicant that the applicant mental health center or mental health clinic has met the minimum standards of this rule and Minn. Stat. § 245.69, subd. 2.

3. Case review: A process of consultation which specifically addresses a client's condition and treatment, including issues of presenting problems, diagnosis and assessment, measurable treatment goals and objectives, treatment strategy, the appropriateness of the treatment and its duration, the outcomes of treatment, etc.

4. Clinical services: Services provided to a specific person or persons, to diagnose and prognosticate the recipient's status relative to a disabling condition or problem; and, where indicated, to treat the recipient to reduce impairment due to mental illness. This includes time spent in treatment planning, record keeping required for treatment, and quality assurance mechanisms.

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5. Commissioner: Commissioner of the Minnesota Department of Public Welfare or a designated representative.

6. Competent: Having qualifications and abilities to provide certain mental health services, based on experience, education, training and personal characteristics; having qualifications in assessment, diagnosis and treatment strategies, and the ability to work well with certain categories of clients.

7. Consultation: The process of imparting information or advice by one person or persons to another person or organization.

8. Continuing education: The process of planned augmentation of job related knowledge, understanding, and skills for the staff of a mental health center or clinic to assist staff in acquisition of the skills needed to update or enhance their competencies in the delivery of clinical services.

9. Deferral: The determination by the commissioner and written notice to the applicant that the applicant mental health center or clinic does not meet the minimum standards of this rule, a listing of the specific deficiencies and providing up to six (6) months to make needed changes as a prerequisite for approval.

10. Disapproval: The determination by the commissioner and written notice to the applicant that the applicant mental health center or clinic does not meet the minimum standards of this rule.

11. Documentation: Automatically and/or manually produced and stored evidence that will attest to the compliance with requirements of this rule.

12. Fee: The non-refundable charge for processing each application for approval under this rule.

13. Discipline: A particular field of study and training, e.g., psychiatry, psychology, clinical social work, psychiatric nursing and allied mental health field.

14. Group Health Insurance: An insurance policy providing insurance reimbursement for health-related services for persons enrolled with the insurance carrier as part of a covered group.

15. Legally constituted person: An organization that is constituted by at least one of the following: 1) charter, 2) articles of incorporation, 3) partnership, or 4) legislative or executive action; and that has a governing body that sets policy and is fully responsible for the operation and performance of the organization.

16. Mental health center: An outpatient mental health facility which offers clinical services and indirect services such as consultation, prevention, and community education; and is a legally constituted person.

17. Mental health clinic: An outpatient mental health facility or clearly identifiable outpatient mental health unit within an organization, which offers primarily clinical services; and is a legally constituted person.

18. Mental health practitioner: A staff member not in E.3.d, E.3.e, or E.3.f, providing clinical services under the direct supervision of a mental health professional, with identifiable training and areas of competence, and either a) bachelor's degree in a mental health field from an accredited college or university and one year of supervised clinical experience; b) three years of supervised clinical experience; c) a graduate student formally assigned to the center or clinic by their accredited college or university; or d) a masters or other graduate degree in a mental health field from an accredited college or university.

19. Mental health professional: A staff member listed in E.3.d., E.3.e., or E.3.g. providing clinical services including all Minnesota licensed psychologists and psychiatrists.

20. Mental illness: A condition with physiological, psychological, and social components, which results in an inability to interpret the environment realistically and in an impaired functioning in primary aspects of daily living such as personal relations, living arrangements, work, and recreation. For purposes of reimbursement under the terms of this rule, mental illness shall mean a condition listed in the International Classification of Diseases (ICD-9-CM) whose classification category and code is included in the range 290.0-302.99 or 306.0-315.99, or the corresponding code in the American Psychiatric Association Diagnostic and Statistical Manual (DSM-III), Axes I, II or III.

21. Multidisciplinary staff: All mental health professionals and mental health practitioners providing outpatient clinical services for mentally ill persons and employed by the center or clinic.

22. Subscriber contract: A contract, agreement, or other arrangement between a nonprofit health service organization and the subscriber (or an employer for the benefit of the subscriber) under the terms and conditions of which health service or reimbursement therefor is provided.

23. Treatment strategy: Particular form(s) or modality(s) of service delivery, appropriate to problems of mental illness and client characteristics which delineate the process for achievement of client goals.

E. Minimum standards.

1. Treatment standards.

a. Each mental health center or clinic shall establish a diagnostic and assessment process that provides services appropriate to the individual needs of clients for whom services are reimburseable through group health or subscriber contract. The diagnosis shall be by or under the direct supervision of and signed by a psychiatrist and/or licensed consulting psychologist, or by and signed by a licensed psychologist in collaboration with a licensed consulting psychologist.

b. Each mental health center or clinic shall have a case record and individual treatment plan for each client for whom treatment services are reimburseable through group health insurance or subscriber contract. The case record shall include a) the DSM/III or ICD-9-CM diagnosis; b) indications of clinical services received by the client, including peer review and consultation notes; c) the treatment plan; and d) at the closing of the case, a statement of treatment outcome. Case records shall be maintained sufficient to determine good practice. The individual treatment plan, based upon a diagnostic assessment of mental illness, shall be jointly developed by the client and mental health professional. The plan shall include a) client or family history; b) statement of the presenting problem as seen by the client; c) measurable treatment goals; and d) treatment strategy. Clinical services shall be provided in accordance with the plan, and updated as needed with the client. A mental health professional shall be responsible for the treatment of each client.

c. Clinical services shall be appropriate to the presenting problem, age, sex, socioeconomic and ethnic background of the client, and provided in the least restrictive manner. Clinical services shall be provided in accordance with existing professional codes of ethics.

d. If the appropriate treatment and/or the client desired treatment is not available at the mental health center or clinic, the facility shall make appropriate referrals for the client.

e. Each mental health center or clinic shall ensure clinical services are available to clients on an emergency basis.

f. Each mental health center or clinic shall have access to hospital admission for psychiatric inpatient care, and provide as needed by a client. This is not to be interpreted as requiring direct hospital admission privileges on the part of qualified personnel.

2. Quality assurance standards. Each applicant mental health center or clinic shall have established mechanisms for quality assurance and shall provide at the Commissioner's request, documentation of the maintenance and ongoing nature of at least the following:

a. Each mental health center or clinic shall document that staff providing clinical services function in a multidisciplinary manner. There shall be an integral and ongoing involvement of psychiatry, psychology and clinical social work or psychiatric nursing in the provision of clinical services, including diagnosis and assessment, treatment and quality assurance mechanisms.

b. The multidisciplinary staff shall meet at least twice monthly for a minimum of four (4) hours per month for multidisciplinary case reviews, peer consultations, treatment plan development and in-depth case discussions. Each mental health center or clinic shall develop and implement procedures which set standards for case review and encourage the ongoing consultation among multidisciplinary staff. Written minutes of the twice monthly consultation meetings shall be retained at the center or clinic for a period of at least three years.

c. Each mental health clinic or center shall ensure that the client has been informed by the multidisciplinary staff of the staff's assessment of the problem; treatment alternatives; possible outcomes and side effects of treatment modalities; staff recommendations for treatment; approximate length, cost and hoped for outcome of treatment; the prospective client's rights and responsibilities if (s)he consents to the treatment plan; staff rights and responsibilities; the Government Data Practices Act; and procedures for reporting alleged violations of client rights. If the client is considering chemotherapy, hospitalization, or other medical treatment, the appropriate medical staff member shall inform the client of the treatment alternatives, action of the medication or medical procedure, and its possible side effects.

d. Each mental health center or clinic shall have a multidisciplinary peer review system which shall include review of a randomly selected sample of at least 5% or 6 cases, (whichever is more) of the annual active treatment caseloads of each mental health professional. The purposes of peer review shall minimally include assurance that recorded clinical information is sufficient for purposes of clinical care and evaluation; and that diagnosis and treatment provided are appropriate, necessary and sufficient, and of good quality. Each center or clinic shall develop standards and criteria for multidisciplinary peer review of

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cases by mental health professional staff. Minutes of all peer review meetings shall be retained at the center or clinic for at least three years.

e. Each mental health center or clinic shall have an established staff supervision procedure. A staff organization chart and documentation of the ongoing nature and existence of supervisory activity shall be required.

f. Each mental health center or clinic shall have an established internal utilization review system. The system shall permit periodic examination of an agency's operations to determine if resources are being used effectively and efficiently, and review of the cost and quality of clinical services delivered. Utilization data is to be compiled and documentation of the application of such information to agency operations shall occur annually.

g. Each mental health center or clinic shall solicit client input regarding satisfaction with the quality of clinical services.

h. Each mental health center or clinic shall ensure that assignment for treatment is made to an appropriate staff member, competent in the recommended treatment strategy and in treating the individual client characteristics.

i. Each mental health center or clinic shall have a continuing education policy. All multidisciplinary staff shall continue their education as required by rule or statute, or in the absence of any requirement shall attend or otherwise participate in thirty-six (36) clock hours every two years of academic or practical course work and training approved by the governing body of the clinic or center and which is relevant to the identified training needs of the staff. In the event any continuing education requirements are developed pursuant to Minn. Stat. § 214 for any human services occupations which are part of the staff, this portion of this rule is hereby deemed amended to adopt the standards later developed pursuant to Minn. Stat. § 214.

j. Each mental health clinic or center shall develop procedures for the investigation and/or reporting of abuse of clients in accordance with the Vulnerable Adults Act, Minnesota Laws, 1980, Chapter 542; Reporting of Maltreatment of Minors, Minn. Stat. § 626.556; and existing professional codes of ethics.

k. Client information compiled by a mental health center or clinic, including case records and minutes of staff case-specific consultation, shall be protected as private data on individuals within the welfare system as provided in Minn. Stat. §§ 15.1611-15.1698, the Government Data Practices Act.

3. Staffing standards.

a. Each applicant mental health center and clinic shall employ a multidisciplinary staff in psychology, psychiatry and related disciplines consistent with any personnel standards developed pursuant to Minn. Stat. § 214 for any human services occupation now credentialed or which may be credentialed by the state. Employment records shall be maintained sufficient to determine the clinical services qualifications and terms and conditions of employment for each multidisciplinary staff person.

b. Each mental health center and clinic shall designate a mental health professional responsible for ensuring compliance with the rule standards.

c. The multidisciplinary staff shall be composed of at least four (4) mental health professionals. At least two (2) of the mental health professionals shall be employed full-time (minimally 35 hours a week) by the mental health center or clinic and shall be of different disciplines.

d. The mental health professional staff shall include a psychiatrist, board certified or eligible for board certification and licensed under Minn. Stat. § 147; and a licensed consulting psychologist, licensed under Minn. Stat. § 148.88-148.99.

e. The mental health professional staff shall include a clinical social worker with a masters degree in social work from an accredited college or university or its equivalent with at least two (2) years of post-masters supervised experience in direct clinical services and/or a clinical psychiatric registered nurse with a masters degree from an accredited college or university or its equivalent who is licensed under the Section Minn. Stat. §§ 148.171-148.285 with at least two years of post-masters supervised experience in direct clinical services. A minimum of one (1) hour of supervisory contact per week is required to classify clinical experience as supervised.

f. The mental health professionals required in E.3.d. and E.3.e. shall each be employed by the clinic or center in the form of an individual who is on-site and providing clinical services at least eight (8) hours every two weeks. This standard shall be considered minimal for the smallest clinic or center permissable under E.3.c. Larger clinics and centers shall employ or contract with these required professionals in similar proportion to ensure and document their ongoing presence and availability in the provision of clinical services.

g. The mental health professional staff may also include clinical, counseling, or health care psychologists with a master's degree from an accredited college or university or its equivalent with at least two (2) years of post-master's supervised experience in direct clinical services or who is licensed under Minn. Stat. §§ 148.88-148.99; and/or a person with a masters degree from an accredited college or university or its equivalent in an allied mental health field, which degree is established by

the person's official transcript to minimally include 36 semester hours of graduate course work in clinical theory and supervised clinical work, with at least two (2) years of post-masters supervised experience in direct clinical services. A minimum of one (1) hour of supervisory contact per week (35 hours of clinical services) is required to classify clinical experience as supervised.

h. No discipline shall be represented in a full-time equivalent proportion of the mental health professional staff greater than 60%. This provision does not apply to mental health centers and clinics with less than six (6) full-time equivalent mental health professional staff, though compliance with all other staffing standards is required. In determination of full-time equivalence, only time spent in clinical services shall be considered.

i. Mental health practitioners may be employed by a mental health center or clinic to provide clinical services in their documented area of competence for purposes of reimbursement. A center or clinic employed mental health professional shall be responsible for supervision of the practitioner, including a minimum of one (1) hour of face-to-face, case-specific consultative supervisory contact each week. All practitioners shall minimally attend two case-specific consultation meetings a month, and continue their education as required by E.2.i. All client cases receiving clinical services from a practitioner shall be reviewed at least once each two (2) months by the clinical supervisor; in addition, such cases are subject to the same agency peer review mechanism as all other cases. Mental health practitioners shall not comprise more than twenty-five (25) percent of the full-time equivalent total of all the multidisciplinary staff. In determination of full-time equivalence, only time spent in clinical services shall be considered. In the event practitioner standards are developed pursuant to Minn. Stat. § 214 which are not consistent with this section, those provisions of the rule are superceded by Minn. Stat. § 214.

F. Approval procedures.

1. Application.

a. An organization seeking approval as a mental health center or mental health clinic for insurance reimbursement of its outpatient mental illness services shall make formal application to the commissioner for such approval. The application forms for this purpose shall be obtained from the Mental Illness Program Division of the Minnesota Department of Public Welfare. The application forms shall require only such information as is required by statute or rule.

b. Payment of a nonrefundable application fee, established by the commissioner, shall accompany each application. A fee shall be required for reapplication following disapproval of a previous application.

2. Review. When a completed application has been received, the commissioner shall begin the formal review, including the on-site survey. Documentation of standards, as agency policy and as procedures implemented in the provision of clinical services, shall be reviewed. If implementation of a procedure is too recent to be reliably documented, a written statement of the planned implementation shall be accepted as documentation on the initial application. The review shall minimally include the following:

a. Review of documentation provided by the applicant organization of its multidisciplinary staff, education and training credentials, and areas of competence of both mental health professional and mental health practitioner staff.

b. Review of written agency policy and procedures for provision of clinical services in a multidisciplinary manner, and documentation of how the procedures are actually in effect on an ongoing basis.

c. Review of documentation provided by the applicant organization of its quality assurance procedures, including:

(1) A written agency policy on continuing education for all multidisciplinary staff providing clinical services, and an assessment of staff professional education and training needs, with the agency responsible for showing the relevancy of the continuing education to the identified training needs of its staff.

(2) The written policy and procedures to protect clients and inform them of their rights and the treatment process, including reporting and/or investigation of alleged violations of client rights and documentation on how the policy and procedures are actually in effect on an ongoing basis.

(3) Organizational structure including written procedures for multidisciplinary staff interaction and supervision.

(4) Written multidisciplinary case-specific consultation standards, criteria, policy and procedures.

(5) Written multidisciplinary peer review system standards, criteria, policy and procedures.

(6) Written client satisfaction assessment procedures.

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(7) Internal utilization review written policy and procedures, including the annual application of information to agency operations.

d. Review of written applicant organization policy and procedures for intakes, case assignment and diagnosis and assessment; referral policy; emergency service procedure, case termination procedure; and documentation on how the procedures are actually in effect on an ongoing basis.

e. Review of case record and treatment plan format and procedure.

f. Interview with a random sample of multidisciplinary staff of the organization.

g. Review of a random sample of treatment plans and case records.

h. The Department of Public Welfare shall ensure that the use and disclosure of information on applicants, their employees, and their clients in the approval process be safeguarded and in compliance with the Government Data Practices Act, Minn. Stat. § 15.1611-15.1699.

i. Unannounced site visits of the mental health center or clinic may occur during approval and deferral periods to verify continuing compliance with the rule. Any such visit shall occur only during normal working hours of the center or clinic, and shall not disrupt the normal functioning of the facility.

3. Method of approval/disapproval.

a. Upon completion of the on-site review, the reviewer(s) shall submit to the commissioner the survey findings with a recommendation to approve, defer or disapprove the application, and the reasons for the recommendation.

b. The commissioner shall send the applicant organization a letter of approval, deferral or disapproval within 30 days of the completion of the on-site review. If the decision is deferral or disapproval, the commissioner's letter to the applicant organization shall state the specific deficiencies.

c. The commissioner shall disapprove an applicant organization or withdraw approval when a mental health center or clinic is not in compliance with the authorizing statute and with this rule.

d. If an applicant is deferred, the length of deferral shall not exceed six months. If deficiencies stated in the deferral letter are not satisfactorily corrected by the end of the deferral period, the application is disapproved. At any time during the deferral period, the applicant may submit documentation indicating correction of such deficiencies; the commissioner shall then approve or disapprove the applicant within 30 days. At any time during the deferral period, the applicant may request the commissioner to change the applicant status to disapproval; the commissioner shall comply within 14 days of receipt of this written request. The applicant shall not be considered an approved clinic or center, or eligible for insurance reimbursement as such during the deferral period.

e. An approved center or clinic may submit claims for insurance reimbursement for services provided on or after the date the completed application is received by DPW, except for applicants deferred or disapproved during the review process. A deferred applicant may submit claims for insurance reimbursement for services provided on or after the date the commissioner signs a letter notifying applicant of approval. No center or clinic shall submit claims for insurance reimbursement as an approved clinic or center until receipt of written notice of approval by the commissioner, except as provided in F.3.f. and F.3.g.

f. The currently approved mental health center and clinic under Department of Public Welfare Rule 28 shall continue as an approved center or clinic for 180 days after the date this rule is effective provided that the center or clinic submits a completed application within 45 days after the date this rule is effective. Centers and clinics not submitting a completed application within 45 days shall lose their approval status effective 60 days after the effective date of this rule.

g. Each completed application received from a Rule 28 approved mental health center or clinic within the 45 days shall be reviewed. If the written application appears to meet all minimal standards, a letter of provisional approval by the commissioner shall be issued. The provisional approval shall enable the center or clinic to submit claims for insurance reimbursement as an approved center or clinic for a time period not to exceed 30 days after the on-site review. If the application does not appear to meet minimal standards, the applicant shall be notified of the deficiencies. The applicant shall lose approval status effective 180 days after the date this rule is effective if the deficiencies have not been corrected.

h. The Department of Public Welfare shall maintain an administrative file on each applicant for five (5) years, including:

(1) application and attached documentation;

(2) on-site survey report, or statement why it was not conducted;

(3) reviewer's report and recommendation to the commissioner;

(4) letters of approval, deferral and/or disapproval sent to applicant;

(5) appeal documents;

(6) reports of agency changes in policy, staff and/or services;

(7) other related correspondence.

i. The commissioner may accept as documentation for a specific standard, evidence of licensure or accreditation through another regulating body when the required minimum standards are the same as or higher than that of a specific provision of the rule.

4. Appeals. If a mental health center or clinic is disapproved, a contested case hearing and judicial review may be requested by an applicant organization as provided in Minn. Stat. §§ 15.0418-15.0425. A mental health center or clinic which is disapproved, or whose approval is withdrawn due to noncompliance, may reapply with a new formal application not sooner than ninety (90) days after notification of disapproval.

G. Application fee. An application fee, not to exceed $1,000, shall be established by the commissioner. The fee shall be based on the estimated cost of the application procedure and number of applicants; it shall be revised periodically as the commissioner deems necessary to ensure related expenditures are not in excess of fees collected.

H. Duration of approval.

1. Initial approval by the commissioner shall be valid for twelve (12) months from the effective date. Subsequent approvals may be valid for up to twenty-four (24) months. If an approved mental health center or clinic has met the conditions of this rule, including reapplication when required, its status as an approved mental health center or clinic shall continue in effect pending department processing of the reapplication.

2. The approval shall be issued only for the location(s) and mental health center or clinic named in the application, and shall not be transferable or assignable to another location or center or clinic.

3. Changes in mental health center or clinic staffing, treatment or quality assurance procedures that may effect the ability of the center or clinic to comply with the minimum standards of this rule shall be reported in writing to the commissioner within two weeks of occurrence. Review of the change shall be conducted within two weeks of notification. Organizations with changes resulting in deficiencies in minimum standards for approval shall be notified, and may have up to six months to correct deficiencies before losing approval status. Interim procedures to resolve the deficiency on a temporary basis shall be developed and submitted in writing to the commissioner for his approval. Nonreporting of change that results in deficiency, failure to develop an approved interim procedure, or nonresolution of the deficiency within six months, shall result in loss of approved status.

Energy Agency
Alternative Energy Development Division

Proposed Temporary Rule Governing Certification of Solar Collectors to Qualify Renewable Energy Source Expenditures for the Minnesota Individual Income Tax Residential Energy Credit

Request for Public Comment

The Minnesota Energy Agency proposes to adopt a temporary rule for the certification of solar collectors for income tax credit, pursuant to Minn. Stat. § 290.06, subd. 14 (1980). The proposed temporary rule provides that, until the agency promulgates permanent rules for the certification of solar collectors, solar collector expenditures which qualify for the federal renewable energy source residential tax credit shall be deemed certified by the agency for purposes of the Minnesota tax credit. Written comment, data and views will be accepted through March 16, 1981, and should be directed to John R. Dunlop, Manager, State Solar Office, Minnesota Energy Agency, 980 American Center Building, 150 East Kellogg Boulevard, Saint Paul MN 55101. The proposed temporary rule may be modified if the modifications are supported by the data and views submitted to the agency. **[The text of the above-referenced proposed temporary rule appears in this issue at S.R. 1298.]**

KEY: PROPOSED RULES SECTION — Underlining indicates additions to existing rule language. ~~Strike outs~~ indicate deletions from existing rule language. If a proposed rule is totally new, it is designated "all new material." ADOPTED RULES SECTION — Underlining indicates additions to proposed rule language. ~~Strike outs~~ indicate deletions from proposed rule language.

SUPREME COURT

Decisions Filed Friday, February 13, 1981

Compiled by John McCarthy, Clerk

51351/Sp. William Bliss, Relator, v. Minneapolis Star & Tribune Company. Workers' Compensation Court of Appeals.

Reversed and remanded. Scott, J. Dissenting, Otis, J.

51160/Sp. State of Minnesota, by its Minnesota State Ethical Practices Board, v. The Red Lake DFL Committee, Appellant. Beltrami County.

A political committee composed of members of the Red Lake Band of Chippewa Indians living on the Red Lake Reservation is subject to the provisions of Minn. Stat. ch. 10A (1980) when it sponsors and pays for political advertisements disseminated outside the reservation to influence voters of the state to vote for particular candidates for the governorship, offices in the Minnesota Legislature, and offices in the United States Congress.

Affirmed. Simonett, J.

OFFICIAL NOTICES

Pursuant to the provisions of Minn. Stat. § 15.0412, subd. 6, an agency, in preparing proposed rules, may seek information or opinion from sources outside the agency. Notices of intent to solicit outside opinion must be published in the *State Register* and all interested persons afforded the opportunity to submit data or views on the subject, either orally or in writing.

The *State Register* also publishes other official notices of state agencies, notices of meetings, and matters of public interest.

Department of Commerce Insurance Division

Petition by the Workers' Compensation Insurers Rating Association of Minnesota for Changes in the Basic Manual for Workers' Compensation and Employers' Liability. Docket No. INS-81-009-JL

Notice of Hearing

On October 22, 1980, the Workers' Compensation Insurers Rating Association of Minnesota filed a Petition to amend the Basic Manual for Workers' Compensation and Employers' Liability Insurance. The Basic Manual contains rules governing the issuing, underwriting, classification, and auditing of workers' compensation insurance risks and policies within the state of Minnesota. The hearing in matter will be conducted before Hearing Examiner, Jon Lunde, Office of Administrative Hearing, Room 300, 1745 University Avenue, St. Paul, Minnesota 55104, telephone (612) 296-6910.

Pursuant to the prehearing order from Hearing Examiner Jon Lunde dated February 6, 1981, the Insurance Division issues the following notice.

Notice is hereby given that anyone not currently a party to this matter who may wish to participate as a party should contact the Hearing Examiner no later than February 27, 1981. Any person may appear at the hearing to present testimony or exhibits, to the extent permitted by the hearing examiner, at the beginning of each scheduled hearing date pursuant to 9 MCAR § 2.210 E. Any person so appearing may question witnesses, and any person offering testimony or exhibits may be questioned by the parties to this proceeding, to the extent permitted by the hearing examiner.

Further, notice is given that the public hearing in this matter will commence on May 26, 1981, at the Office of Administrative Hearings, address noted above, at 9:00 a.m. The hearing date may be continued, and any such request for a continuance may be made by contacting the Hearing Examiner Jon Lunde.

February 12, 1981

William R. Howard
Assistant Commissioner of Insurance

Energy Agency
Alternative Energy Division

Notice of Intent to Solicit Outside Opinions Regarding Rules Governing Certification of Solar Collectors to Qualify Renewable Energy Source Expenditures for the Minnesota Individual Income Tax Residential Energy Credit

Notice is hereby given that the Minnesota Energy Agency is seeking information or opinions from sources outside the agency in preparing to promulgate new rules governing the certification of solar collectors to qualify expenditures for the solar collectors for income tax credits. The promulgation of these rules is authorized by Minn. Stat. § 290.06, subd. 14 (1980), which requires the agency to promulgate rules establishing the criteria for certification of solar collectors as required by clause (a) of that statutory subdivision.

The agency requests information and comments generally concerning the subject matter of the rules and, specifically on a set of draft rules which is available from the agency at the address/telephone listed below. Interested or affected persons or groups may submit statements of information or comment orally or in writing. Written statements and requests for the draft rules should be addressed to John R. Dunlop, Manager, State Solar Office, Minnesota Energy Agency, 980 American Center Building, 150 East Kellogg Boulevard, St. Paul, Minnesota 55101. Oral statements will be received during regular business hours over the telephone at 612/296-4737 and in person at the above address. Requests for draft rules will be received over the telephone by the Energy Agency Information Center at 296-5175 (metro area) or 1-800-652-9747 (outstate).

All statements of information and comment shall be accepted until March 27, 1981. Any written material received by the agency shall become part of the record when the rules are promulgated.

Higher Education Coordinating Board

Notice of Intent to Solicit Outside Information Regarding Proposed Amendment of Rules Governing Scholarship and Grants-in-aid; Work-study Grants; Minnesota State Student Loan Program; Minnesota Foreign Student Assistance; Veterans' Dependents Student Assistance; Part-time Student Grants; Private Institutions Registration; and the Area Vocational-technical Institute Tuition Subsidy Program

Notice is hereby given that the Minnesota Higher Education Coordinating Board is seeking information or opinions from sources outside the agency in preparing to propose the amendment of rules governing the Scholarships and Grants-in-aid Program (presently 5 MCAR §§ 2.0101-2.0108), the Work-Study Grants Program (presently 5 MCAR §§ 2.0301-2.0310), The Minnesota State Student Loan Program (presently 5 MCAR §§ 2.0501-2.0507), the Minnesota Foreign Student Assistance Program (presently 5 MCAR §§ 2.0601-2.0607), the Minnesota Veterans' Dependents Student Assistance Program (presently 5 MCAR §§ 2.0702-2.0800), the Part-Time Student Grant Program (presently 5 MCAR §§ 2.0801-2.0806), the Private Institutions Registration Program (presently 5 MCAR §§ 2.0901-2.1000), and the Area Vocational-Technical Institute Tuition Subsidy Program (presently 5 MCAR §§ 2.1001-2.1008).

The promulgation of these rules is authorized by Minnesota Statutes §§ 136A.111, 136A.16, 136A.234, 136A.236, 136A.70 (1980).

The Minnesota Higher Education Coordinating Board requests information and comments concerning the subject matter of these rules. Interested or affected persons or groups may submit statements of information or comments orally or in writing. Written statements should be addressed to:

Mary Samoszuk
Minnesota Higher Education Coordinating Board
400 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101

Oral statements will be received during regular business hours over the telephone at (612) 297-2036 and in person at the above address.

Any written material received by the Minnesota Higher Education Coordinating Board shall become part of the record in the event that the rules are promulgated.

Minnesota State Retirement System

Regular Meeting, Board of Directors

Regular quarterly meeting of the Board of Directors, Minnesota State Retirement System, will be held on Friday, February 27, 1981 at 9:00 a.m. in the office of the System, 529 Jackson Street, St. Paul, Minnesota.

Office of the Secretary of State

Notice of Vacancies in Multi-member State Agencies

Notice is hereby given to the public that vacancies have occurred in multi-member state agencies, pursuant to Minn. Stat. § 15.0597, subd. 4. Application forms may be obtained at the Office of the Secretary of State, 180 State Office Building, St. Paul 55155; (612) 296-7876. **Application deadline is March 10, 1981.**

REHABILITATION REVIEW PANEL has one vacancy open immediately for a physician in medicine. The panel reviews rehabilitation plans and rules; advises Commissioner of Labor and Industry. Members are appointed by the Governor. For specific information, contact Rehabilitation Review Panel, 30 State Capitol, St. Paul 55155; (612) 296-3391.

COUNCIL ON AFFAIRS OF SPANISH-SPEAKING PEOPLE has one vacancy open immediately for a public member. The council advises the Governor and Legislature on issues affecting the Spanish-speaking community. Members are appointed by the Governor and confirmed by the Senate, and receive $35 per diem. For specific information, contact Council on Affairs of Spanish-Speaking People, 504 Rice St., St. Paul 55101; (612) 296-9587.

COMMUNITY SCHOOL ADVISORY COUNCIL has one vacancy open immediately for a public member in the 7th district. The council promotes the advancement of educational, recreational and social opportunity through maximum utilization of public school facilities. Members are appointed by the governor and receive $35 per diem plus expenses. For specific information, contact Community School Advisory Council, 680 Capitol Square Bldg., St. Paul 55101; (612) 296-2587.

CONSUMER ADVISORY COUNCIL ON VOCATIONAL REHABILITATION has one vacancy open immediately for a public handicapped member. The agency is accepting further applications for its previously announced vacancies, terms ending January 1, 1985. Business and/or consumer representation is required. Advises the assistant Commissioner of Vocational Rehabilitation on policy matters relating to vocational rehabilitation services. Members are appointed by the Commissioner of Economic Security. Meetings are bi-monthly in St. Paul; members receive $35 per diem. For specific information contact, Consumer Advisory Council on Vocational Rehabilitation, 3rd Floor, Space Center Bldg., St. Paul 55101; (612) 296-1822.

Board of Teaching

Notice of Intent to Solicit Outside Opinion Concerning Proposed Rules Governing the Licensure of Elementary School Classroom Teachers, Licensure of Teachers in Middle Schools, Procedures for the Issuance of Life Licenses, Procedures for the Revocation or Suspension of Minnesota Teaching Licenses, Letters of Approval for Teachers to Teach Subjects or Fields for Which Current Valid Minnesota Licensure Is Not Held, Procedures for the Voluntary Surrender of Minnesota Teaching Licenses

Notice is hereby given that the Minnesota Board of Teaching is considering adopting and/or amending rules governing the licensure of Elementary School Classroom Teachers, Licensure of Teachers in Middle Schools, Procedures for the Issuance of Life Licenses, Procedures for the Revocation or Suspension of Minnesota Teaching Licenses. Letters of Approval for Teachers to Teach Subjects or Fields for Which Current Valid Minnesota Licensure is not Held, Procedures for the Voluntary Surrender of Minnesota Teaching Licenses.

The proposed rules are authorized by Minn. Stat. §§ 125.05, subd. 1, and 125.185, subd. 4 (1980), which authorizes the board to establish reasonable standards for the licensure of teachers. The proposed rules would establish reasonable standards and procedures related to the issuance of the licenses to teach in the State of Minnesota.

All interested or affected persons or groups may submit information related to the above cited proposed rules. Written or oral information and comment should be addressed to:

Kenneth L. Peatross, Executive Secretary
Minnesota Board of Teaching
608 Capitol Square Building
550 Cedar Street
St. Paul, Minnesota 55101
(612) 296-2415

Any written material received by the board related to the above cited proposed rules shall become part of the hearing record in the event that the proposed rules governing these subjects are promulgated.

February 5, 1981

Kenneth L. Peatross, Executive Secretary
Minnesota Board of Teaching

Department of Transportation

Petition of Chicago, Milwaukee, St. Paul and Pacific Railroad Company for Authority to Abandon and Remove Tracks Owned by Petitioner between Washington Avenue and Second Street, Approximately Four to Five Blocks East of the Milwaukee Road Passenger Depot in Minneapolis, Minnesota

Amended Order for Hearing and Notice Thereof

It is hereby ordered, and notice is hereby given that, upon the request of the hearing examiner, the Commissioner of Transportation has rescheduled a contested case hearing concerning the above-entitled matter. The hearing previously scheduled to be held on March 10, 1981 will now be held on March 5, 1981 at 9:30 A.M. in Meeting Room E, Level A, Hennepin County Government Center (North East Street Level) 300 South 6th Street, Minneapolis, Minnesota.

The hearing will be held before Mr. Richard Delong, 1745 University Avenue, Saint Paul, Minnesota 55104 (Telephone: 612-296-8117) a hearing examiner appointed by the Chief Hearing Examiner of the State of Minnesota. All parties have the right to be represented by legal counsel or any other representative of their choice throughout the contested case proceeding. The hearing will be conducted pursuant to the contested case procedures set out in Minnesota Statutes §§ 15.0411 through 15.052 and 9 MCAR §§ 2.201 through 2.222. Questions concerning the issues raised in this Order or concerning informal disposition or discovery may be directed to Mr. Gordon W. Boldt, Director, Office of Railroad Administration, 419 Transportation Building, Saint Paul, Minnesota 55155 (Telephone: 612-296-2452).

The purpose of the hearing is to ensure that under the provisions of Minnesota Statutes §§ 219.681 and 219.741, all parties and potential parties of interest are given an opportunity to be heard on the petition of Chicago, Milwaukee, St. Paul and Pacific Railroad Company for authority to abandon and remove tracks owned by Petitioner between Washington Avenue and Second Street, approximately four to five blocks east of the Milwaukee Road passenger depot in Minneapolis, Minnesota.

The petition recites among other matters:

"That the property upon which said trackage is located has been sold by Petitioner to the County of Hennepin which proposes to use said property for parking facilities."

"That there is no longer any need by the shipping or receiving public for the continued maintenance of this track, and its continued maintenance and operation is economically not justified and therefore Petitioner requests authority to remove said trackage. . . ."

Any person who desires to become a Party to this matter must submit a timely Petition to Intervene to the hearing examiner pursuant to 9 MCAR § 2.210, showing how the person's legal rights, duties and privileges may be determined or affected by the decision in this case. The petition must also set forth the grounds and purposes for which intervention is sought.

All parties are advised that if a party intends to appear at the hearing scheduled for March 5, 1981, the Notice of Appearance form enclosed with this order must be completed and returned to the hearing examiner at least 10 days before the hearing date. SHOULD A PARTY FAIL TO APPEAR AT THE HEARING, THE ALLEGATIONS MADE IN THE PETITION MAY BE TAKEN AS TRUE.

The above cited procedural rules are available at the Office of Administrative Hearings or may be purchased from the Documents Section of the Department of Administration, Ford Building, 117 University Avenue, Saint Paul, Minnesota 55155 (Telephone: 612-297-3000). They provide generally for the procedural rights of the parties including: rights to advance notice of

witnesses and evidence, right to a prehearing conference, rights to present evidence and cross-examine witnesses, and right to purchase a record or transcript. Parties are entitled to issuance of subpoenas to compel witnesses to attend and produce documents and other evidence.

Persons attending the hearing should bring all evidence bearing on the case including any records or other documents. If persons have good reason for requesting a delay of the hearing, the request must be made in writing to the Hearing Examiner at least 5 days prior to the hearing. A copy of the request must be served on the agency and any other parties.

February 13, 1981

Richard P. Braun
Commissioner

Department of Transportation

In the matter of the petition of Chicago, Milwaukee, St. Paul and Pacific Railroad Company for authority to abandon and remove tracks owned by Petitioner between Washington Avenue and Second Street, approximately four to five blocks east of the Milwaukee Road passenger depot in Minneapolis, Minnesota.

Amended Notice of Appearance

Date of Hearing: March 5, 1981

Name and Telephone Number of Hearing Examiner: Richard DeLong
1745 University Avenue
Saint Paul, Minn. 55104
296-8117

TO THE HEARING EXAMINER:

You are advised that the party named below will appear at the above hearing.

Name of Party: _____

Address: _____

Telephone Number: _____

Party's Attorney or Other Representative: _____

_____

Signature of Party or Attorney: _____

Date: _____

STATE OF MINNESOTA
OFFICE OF THE STATE REGISTER

State Register and Public Documents Division
117 University Avenue
St. Paul, Minnesota 55155

ORDER FORM

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FOR LEGISLATIVE NEWS

Publications containing news and information from the Minnesota Senate and House of Representatives are available free to concerned citizens and the news media. To be placed on the mailing list, write or call the offices listed below:

Briefly/Preview—Senate news and committee calendar; published weekly during legislative sessions. Contact Senate Public Information Office, Room B29 State Capitol, St. Paul MN 55155, (612) 296-0504.

Perspectives—Publication about the Senate. Contact Senate Information Office.

Weekly Wrap-Up—House committees, committee assignments of individual representatives, news on committee meetings and action, House action and bill introductions. Contact House Information Office, Room 8 State Capitol, St. Paul, MN, (612) 296-2146.

This Week—weekly interim bulletin of the House. Contact House Information Office.

Minnesota Reports—Old editions available at $8.25 each plus tax. These are Supreme Court decisions. Recent volumes are available at the Supreme Court, Office of Court Administrator, 317E Capitol, St. Paul, MN 55155. Volumes available are 312 and previous numbers.

State of Minnesota
Board of Education

RECEIVED
MAR 5 1987
ADMINISTRATIVE HEARINGS

Statement of Need and Reasonableness for
Proposed Rule 5 MCAR § 1.0533

Concerning: The proposed adoption of a rule governing the licensure of head varsity coaches of interscholastic sports in senior high schools.

The proposed rule 5 MCAR § 1.0533 is necessary to implement licensure standards and procedures for head varsity coaches of interscholastic sports in senior high schools. At present, only head coaches in six boys' sports are required to hold licensure. Those sports are football, baseball, basketball, track, wrestling, and hockey. A rule which was to become effective in 1972 governing licensure of coaches of interscholastic sports for girls was repealed after the Commissioner of Human Rights determined that discrimination in the applicability of two separate coaching licensure rules, with differing criteria, one for boys' interscholastic sports and one for girls' interscholastic sports, would have existed. Subsequently, numerous meetings and public hearings were conducted in an attempt to enact an equitable coaching licensure rule which would not necessitate the elimination of athletic opportunities for students in secondary schools.

Proposed licensure rule 5 MCAR § 1.0533 was developed after input and meeting with the following organizations and agencies: Minnesota Board of Teaching; Minnesota School Boards Association; Minnesota Education Association; Minnesota Federation of Teachers; Minnesota State High School League; Association of Metropolitan School Districts; Minnesota State High School Coaching Association for Boys and Girls; Minnesota State High School Athletic Directors' Association; Minnesota colleges and universities involved in teacher preparation; Minnesota Congress of Parents, Teachers and Students; and the Minnesota Association of School Administrators. These organizations responded to invitations and took part in meetings and provided input. Many other organizations were invited but did not respond. In addition, every school district in the state received a proposed draft of the rule and many of the districts did respond in writing to the proposed draft. The State Board of Education believes that the proposed licensure rule 5 MCAR § 1.0533 has had extensive input and development through the process described above, and that the proposed rule is both needed and reasonable.

5 MCAR § 1.0533 is needed to assure that those persons serving as coaches of interscholastic sports meet minimally acceptable standards. The proposed licensure rule is premised upon the assumption that coaching is teaching; therefore, this proposed rule requires head varsity coaches of interscholastic sports in senior high schools to hold a valid Minnesota elementary or secondary teaching license.

Section A. of the proposed rule addresses the requirement of a teaching license and the completion of a coaching preparation program approved by the Minnesota Board of Education leading to licensure of head varsity coaches of interscholastic sports. Programs of interscholastic sports are an integral part of the total school program and should be so designed as to be of educational value. Therefore, the Board believes that it is essential that coaches of interscholastic sports meet the licensure requirements stated in this rule and hold a Minnesota teaching license.

Edu #8

Section B. defines the head varsity coach as a teacher who has primary responsibility for a senior high school varsity interscholastic sport. Interscholastic sports are defined as those sports in which there is scheduled competition with athletic teams of another school within and outside the school district. A senior high school for purposes of this rule is defined as a secondary school consisting of grades 10-12 or grades 9-12 in a four-year secondary school, or grades 9-12 in a six-year secondary school. It is the position of the Board of Education that those ninth grade students taking part in varsity interscholastic sports in a four-year or six-year secondary school should be included in the licensure rule for their health and safety.

Section C. is a compromise included after previous public hearings indicated that a severe shortage of coaches will result if assistant coaches and junior high school coaches are required to hold licensure. Testimony also showed that programs would be severely curtailed and/or limited if this limitation is not included in the rule. Therefore, the proposed rule applies only to head coaches; it does not require licensure for assistant coaches and junior high coaches.

Ideally, the Board believes that assistant coaches and junior high school coaches should be prepared at least in the areas of first aid and care and prevention of athletic injuries. It is anticipated that school districts will endeavor to provide this minimal training on an inservice basis for assistant coaches and junior high school coaches. The decision not to require licensure for assistant and junior high school coaches is based upon several factors. The Board recognizes that there has been a vast increase in school athletic programs and in participation, particularly for girls. This fact, together with declining enrollments and associated declines in school revenues, has created problems for staffing of the programs. The Board believes that by excluding assistant and junior high school coaches from the licensure requirement, the vast majority of the staffing problems will have been eliminated. It should be recognized, however, that no licensure rule will eliminate all staffing problems and should not be expected to do so.

Section D. of the proposed rule specifies the qualifications for coaching licensure. It is designed to contain the components determined by previous task forces to provide essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport. It should be noted that the rule establishes a maximum of 12 quarter or 9 semester hours of credit for all coaching programs that are submitted to the Board of Education for approval.

The Board recognizes that this attempt to limit programs to 12 quarter or 9 semester hours of credit may be opposed by a number of Minnesota colleges and universities. A number of colleges and universities will state that they are unable to prepare coaches with such a restricted number of credits. While many of the coaching programs in Minnesota colleges and universities currently range from 30 to 40 quarter hours of credit, it is the position of the Board that programs of such length are unnecessary to provide acceptable coaching ability, are prohibitive in length, and accentuate recruiting problems at the school district level. It is the position of the Board of Education that a preparation program consisting of 12 credits is a reasonable number of credits for licensure, and that colleges will be able to redesign and restructure some of their courses to accomplish a preparation program which provides the essential knowledge, skills, and understandings needed in order to effectively coach an interscholastic sport within the parameters of this rule.

The 12 credits pertain only to those teachers who desire a coaching endorsement and are not physical education majors or minors. Persons who are preparing to be physical education teachers will, as part of their program, have completed a coaching preparation endorsement. This proposed rule does not prohibit a college or university from offering a coaching minor or major or a more extensive program for those who desire more preparation. It simply requires completion of an approved program consisting of a maximum of 12 quarter credits for licensure as a coach of interscholastic sports.

Section E. of the proposed rule is an alternate route to licensure. It permits a school district to contract with a college or university which offers an approved coaching licensure program and to develop a joint program that can be offered on an inservice basis in a Minnesota school district. This portion of the rule is intended to create flexibility for those school districts that desire to prepare their own coaches on an inservice basis in conjunction with a college or university.

Section F. is a "grandperson" clause which states that teachers employed as a head varsity, assistant, or junior high school coach can be granted a coaching license provided that 6 quarter hours or 60 clock hours of instruction in first aid and the care and prevention of athletic injuries have been completed. It is the deliberate intention of Section F. to be generous in grandpersoning those teachers that have been serving as coaches and assistant coaches in order not to restrict the supply of coaches available for interscholastic coaching positions. The Board, however, does feel that no grandpersoning should occur unless evidence can be provided of the minimal preparation specified in first aid and the care and prevention of athletic injuries. It should be noted that the Department of Education will be flexible in accepting 60 clock hours of instruction on an inservice basis through the Red Cross or other appropriate agencies.

Section G. of the proposed rule establishes an effective date of July 1, 1982. This effective date is deemed reasonable because of the generous grandpersoning clause which will not curtail the present supply of coaches. In addition, it is thought to be reasonable in terms of college preparation programs because at present there are 22 Minnesota colleges and universities that offer coaching programs and the rule should not necessitate the development of any new programs.

Section H. In previous public hearings involving coaching licensure, school districts indicated that unless special provisions were made for emergency licensure they would be required to curtail or eliminate some athletic programs. Section H. of the proposed rule is intended to address hardship situations where a district may request of the Commissioner of Education a provisional license for a teacher to serve as an interscholastic coach while the preparation program is being completed in a Minnesota college or university.

This section requires that the provisional license be granted only to teachers. The Board of Education does not believe that it is necessary or responsible to include the possibility of granting a provisional license to those persons not holding a valid teaching license. The Board believes that the hardship situations that districts may face can be accommodated by the provisions outlined in Section H. of the proposed rule.

Section I. specifies that coaching licenses may be renewed under the same system that coaches use to renew their teaching licenses in other fields. It will not be necessary for coaches to follow a separate system for renewal of the coaching license.

In summary, the State Board of Education believes that this proposed coaching licensure rule is both needed and reasonable. The Board believes that the preparation outlined in the rule is the minimum amount of preparation needed to serve as a head varsity coach, while at the same time providing for any potential hardship situations that school districts may face in staffing coaching positions.

SF-00006-01

STATE OF MINNESOTA

Office Memorandum

DEPARTMENT of Education

RECEIVED
MAR 12 1981
ADMINISTRATIVE HEARINGS

TO : Lois Steinhaus
Education Statistics

DATE: March 12, 1981

FROM : George B. Droubie, Manager
Personnel Licensing and Placement

PHONE: 6-2046

SUBJECT: Testimony on Coaching Licensure

Following is a list of persons and organizations who will be testifying as part of the Department of Education's presentation in favor of the proposed rule.

1. Minnesota Education Association - Dan Moriarty
2. Minnesota Federation of Teachers - Edward Bolstad or Al Olson
3. Minnesota State High School League - Dorothy McIntyre
4. Minnesota Parent, Teacher, Student Association - Van Mueller

Please forward this information to Peter Erickson. Thank you for your assistance in this matter.

GBD/pac

State of Minnesota
Board of Education

RECEIVED
MAR 27 1981
ADMINISTRATIVE HEARINGS

ADDENDUM

Statement of Need and Reasonableness for
Proposed Rule 5 MCAR § 1.0533

Concerning: The proposed adoption of a rule governing the licensure of head varsity coaches of interscholastic sports in senior high schools.

Following is a list of organizations and persons who will be testifying in support of the proposed licensure rule governing head varsity coaches of interscholastic sports in senior high schools.

Minnesota Education Association	Mr. Dan Moriarty
Minnesota Federation of Teachers	Mr. Al Olson
Minnesota State High School League	Ms. Dorothy McIntyre
Minnesota Parent, Teacher, Student Association	Dr. Van Mueller
Minnesota Board of Teaching	Mr. Kenneth Peatross
Minnesota Department of Education	Dr. Gregory Waddick Dr. George Droubie

Testimony regarding licensure of coaches of interscholastic sports will emphasize general support for the proposal and review aspects of the rule as follows:

--Applicability of the rule in senior high schools

--Definitions of head varsity coach, interscholastic sports, and senior high school

--Scope of the rule in terms of junior high school coaches and assistant coaches

--Qualifications required for coaching licensure

--Alternative route to coaching licensure

--"Grandpersoning" of teachers with coaching experience

--School district hardship situations.