

HOUSE OF REPRESENTATIVES STAFF ANALYSIS

BILL #: HB 7061 PCB PKQ 19-02 Teacher Preparation
SPONSOR(S): PreK-12 Quality Subcommittee, Donalds
TIED BILLS: None **IDEN./SIM. BILLS:** SB 1576

REFERENCE	ACTION	ANALYST	STAFF DIRECTOR or BUDGET/POLICY CHIEF
Orig. Comm.: PreK-12 Quality Subcommittee	15 Y, 0 N	D'Souza	Guy
1) PreK-12 Appropriations Subcommittee	10 Y, 0 N	Seifert	Potvin
2) Education Committee	15 Y, 0 N	D'Souza	Hassell

SUMMARY ANALYSIS

The bill addresses teacher preparation and retention by increasing the opportunities for mentorship, professional development, and examination preparation to equip first-time teachers with tools and supports when they enter the classroom. The bill establishes consistent requirements for curriculum and field experience provided by teacher preparation programs.

Teacher Certification

The bill extends the timeframe by which a candidate may satisfy the General Knowledge Test (GKT) from one to three years, aligning the timeframe with the number of years in which a teacher-candidate may be employed pursuant to a temporary certificate.

The bill increases access to GKT preparation materials and establishes a baseline for materials available to teacher-candidates.

The bill requires the State Board of Education (SBE) to establish separate fees for each subtest of the GKT.

Teacher Preparation

The bill revises requirements for teacher preparation program uniform core curricula.

For both school district-operated teacher preparation programs and Educator Preparation Institute (EPI) programs, the bill revises program requirements to include content aligned to state standards. The bill requires programs to administer participant satisfaction surveys and report survey results.

For all teacher preparation programs, the bill requires practicum experience to include classroom management in a variety of teaching environments and for diverse student populations.

Teacher Professional Development

The bill increases the school district-operated mentorship program from one to two years and provides an exemption from passing the GKT for those teacher-candidates who successfully complete a two-year mentorship program.

The bill increases the opportunities for mentorship and professional development and standardizes professional development content.

The bill requires the Department of Education (DOE) to publish results of a biennial survey on teaching conditions and student learning at the school, district and state levels.

The bill does not have a fiscal impact. See fiscal comments.

The bill provides an effective date of July 1, 2019.

This document does not reflect the intent or official position of the bill sponsor or House of Representatives.

STORAGE NAME: h7061c.EDC

DATE: 4/3/2019

FULL ANALYSIS

I. SUBSTANTIVE ANALYSIS

A. EFFECT OF PROPOSED CHANGES:

In recent years, some school districts and education professionals raised concerns over a potential teacher shortage. Currently, the teacher workforce in Florida is 176,984¹ while vacancies number 3,280², representing 2% of the total teacher workforce.³ Teacher critical shortage areas in Florida⁴ are defined by subject matter certification areas and include Science-General, English and English for Speakers of Other Languages (ESOL), ranked 1st, 2nd and 3rd, respectively, for the 2018-2019 school year.⁵ According to the Florida Department of Education (DOE), over the past five years, the areas identified as critical shortage have “remained relatively stable.”⁶

Generally, there are two considerations when evaluating a teacher shortage: pathways and challenges for new teachers initially entering the workforce; and retention, or the number of teachers who remain in the profession over a five-year period. Florida’s teacher certification process is designed to measure a baseline of knowledge and skill that teachers need to be successful once they enter the classroom. Similar to many other states, Florida’s certification process requires applicants to demonstrate a mastery of general knowledge, professional competency, and subject matter expertise. (The suite of exams testing these areas is referred to as the Florida Teacher Certification Examination (FTCE).)

With respect to retention, Florida is comparable to the national rate for those teachers who remain in the profession five years later, which is approximately 70 percent.⁷ Professional literature indicates that teacher retention is highly influenced by the support and preparation first-time teachers receive. First-time teachers are more likely to leave the profession within the first five years if they are poorly supported or underprepared.⁸ In Florida, the DOE is responsible for the initial and continued approval of teacher preparation programs, but there is variation among school districts programs as to content, participant engagement, and skill development. While the DOE monitors programs through the continued approval review,⁹ it provides limited data on why Florida teachers are exiting the profession.

¹ Florida Department of Education, *Staff in Florida's Public Schools, District Reports 2018-19*, <http://www.fldoe.org/accountability/data-sys/edu-info-accountability-services/pk-12-public-school-data-pubs-reports/staff.stml> (last visited March 6, 2018).

² Florida Department of Education, *Identification of Critical Teacher Shortage Areas* (January 2019), available at <http://www.fldoe.org/core/fileparse.php/7584/urlt/CTSA1920.pdf>

³ Florida Department of Economic Opportunity, *Florida's December Employment Figures Released* (January 2019), available at <http://lmsresources.labormarketinfo.com/library/press/release.pdf>.

⁴ Section 1012.07 F.S.; Rule 6A-20.0131, F.A.C.

⁵ Florida Department of Education, *Identification of Critical Teacher Shortage Areas* (March 2018), available at <http://www.fldoe.org/core/fileparse.php/7584/urlt/CTSA1819.pdf>.

⁶ Florida Department of Education, *Presentation on Educator Quality, Certification & Examinations* (January 23, 2019), available at [https://www.myfloridahouse.gov/Sections/Documents/loaddoc.aspx?PublicationType=Committees&CommitteeId=3018&Session=2019&DocumentType=Meeting Packets&FileName=pkq_1-23-19.pdf](https://www.myfloridahouse.gov/Sections/Documents/loaddoc.aspx?PublicationType=Committees&CommitteeId=3018&Session=2019&DocumentType=Meeting%20Packets&FileName=pkq_1-23-19.pdf).

⁷ Florida Department of Education, *Presentation on Teacher Recruitment and Retention* (August 31, 2016) available at <http://www.fldoe.org/core/fileparse.php/18308/urlt/educatorpres.pdf>

⁸ Julie Rowland Woods, *Mitigating Teacher Shortages: Induction and Mentorship*, Education Commission of the States (May 2016), available at <https://www.ecs.org/wp-content/uploads/Mitigating-Teacher-Shortages-Induction-Mentorship.pdf>.

⁹ Rule 6A-5.066(2)(a), F.A.C.

Teacher Certification

Present Situation

Florida is similarly situated to many other states with respect to the examination component of the professional teacher certification process. Specifically, 27 other states and the District of Columbia require passage of a test for baseline, core academic skills like the General Knowledge Test (GKT).¹⁰

Florida has three types of teaching certificates: a professional certificate; a temporary certificate; and an adjunct certificate.¹¹ For all three, teacher-candidates must submit an application, satisfy general eligibility requirements¹² and certificate-specific requirements included in the chart below. The FTCE can be used to satisfy the testing requirement and includes the GKT (mastery of general knowledge); subject area exams (mastery of subject area knowledge); and the Professional Education Test (mastery of professional preparation and education competence).

<u>Temporary Certificate Requirements</u> ¹³	<u>Professional Certificate Requirements</u> ¹⁴	<u>Adjunct Certificate Requirements</u> ¹⁵
All general eligibility criteria, plus: <ul style="list-style-type: none"> • Demonstrate mastery of subject area knowledge • Obtain full-time employment in a position for which a Florida educators' certificate is required in a Florida public, state supported, or a nonpublic school which has an approved system for documenting the demonstration of required professional education competence 	All general eligibility criteria, plus: <ul style="list-style-type: none"> • Demonstration of general knowledge • Demonstration of subject area knowledge • Demonstration of professional preparation and education competence 	All general eligibility criteria , plus: <ul style="list-style-type: none"> • Does not require passage of the GKT or mastery of general knowledge • Demonstrate expertise in the area to be taught by passing a subject-area test. <p>Adjunct certificate-holders may be employed as part-time instructional staff. The adjunct certificate is valid for only one year and may be reissued if the individual receives a rating of "effective" or "highly effective."</p>

A temporary certificate is nonrenewable, valid for three school years, and allows a teacher-candidate to be employed full-time while completing the outstanding requirements for a professional teaching certificate.¹⁶ Demonstration of the mastery of general knowledge must be satisfied within one year of the date of employment under the temporary certificate.¹⁷

In addition to achieving a passing score on the GKT, there are four additional ways to satisfy the mastery of general knowledge requirement. They are:¹⁸

¹⁰ Praxis, *Praxis® Core Academic Skills for Educators Tests Overview*, <https://www.ets.org/praxis/about/core/> (last visited March 5, 2019).

¹¹ Rule 6A-4.004(4), F.A.C., provides for an "athletic" certificate. This certificate is distinct from those referenced above in that it is limited to athletic coaches who do not have responsibility for subject matter instruction.

¹² Section 1012.56(2), F.S.

¹³ Section 1012.56(7)(b), F.S.

¹⁴ Section 1012.56(7)(a), F.S.

¹⁵ Section 1012.57, F.S.

¹⁶ Florida Department of Education, *Certificate Types and Requirements*, <http://www.fldoe.org/teaching/certification/general-cert-requirements/> (last visited February 25, 2019).

¹⁷ Section 1012.56(2)(g), F.S.

¹⁸ Section 1012.56(3)(a)-(e), F.S.

- Documentation of a valid professional standard teaching certificate issued by another state;
- Documentation of a valid certificate issued by the National Board for Professional Teaching Standards or other credentialing board approved by the State Board of Education (SBE);
- Documentation of two semesters of teaching in a postsecondary institution identified by the DOE as having a quality program; or
- Achievement of passing scores on national or international examinations that test comparable content and relevant standards including, the Graduate Record Examination (GRE).

According to the DOE, the GKT tests a baseline of general knowledge that a person who holds a bachelor's degree is assumed to possess.¹⁹ The GKT, as required by SBE rule, is a multipart exam composed of four subtests: Essay, English Language Skills, Reading, and Mathematics.²⁰ If a candidate fails one or more subtests of the GKT, the candidate must retake only the failed subtest(s) and there is no limit to the number of times a candidate can retake the GKT. Between January 2015 and December 2018, 35,698 (64%) candidates passed all four parts of the GKT equaling 20% of the total teacher workforce.²¹

If a candidate is having difficulty passing the GKT, the candidate may enroll in a state college to take classes that cover the general knowledge concepts that will be tested. The DOE publishes a *Test Information Guide for the GKT*.²² This guide gives a brief overview of the test, provides the competencies and skills that are tested, and presents some sample items.

The registration fees for the GKT are set in SBE rule and are: \$130.00 fee for first-time registration to take all four subtests and \$150.00 registration fee to retake any number of subtests.²³ As the SBE rule is currently written, the fee for retaking a subtest(s) of the GKT is more expensive than the fee charged for initial examination.

The passing scores for the GKT subtests listed below are a scaled score of at least 200 for multiple-choice sections.²⁴

<u>Subtest</u>	<u>Scores Need to Pass²⁵</u>
GKT Subtest 1: Essay	A total raw score of at least 8 points out of 12 possible points.
GKT Subtest 2: English Language Skills	At least 27 correctly answered questions out of 40 questions.
GKT Subtest 3: Reading	At least 26 correctly answered questions out of 40 questions.
GKT Subtest 4: Mathematics	At least 31 correctly answered questions out of 45 questions.

Effect of Proposed Changes

The bill increases the timeframe in which a temporary certificate holder must pass the GKT from one year to three years. The bill requires the SBE to apportion the fees associated with the GKT to each subtest and charge only the amount attributed to each subtest for subsequent retakes.

¹⁹ Florida Department of Education, *Frequently Asked Questions for FTCE & FELE*, <http://www.fldoe.org/accountability/assessments/postsecondary-assessment/faq.stml#4906> (last visited March 5, 2019).

²⁰ Rule 6A-4.0021(6), F.A.C.

²¹ Florida Department of Education, *Presentation on Educator Quality, Certification & Examinations* (January 23, 2019), available at [https://www.myfloridahouse.gov/Sections/Documents/loaddoc.aspx?PublicationType=Committees&CommitteeId=3018&Session=2019&DocumentType=Meeting Packets&FileName=pkq_1-23-19.pdf](https://www.myfloridahouse.gov/Sections/Documents/loaddoc.aspx?PublicationType=Committees&CommitteeId=3018&Session=2019&DocumentType=Meeting%20Packets&FileName=pkq_1-23-19.pdf).

²² FTCE/FELE, *Test Information Guides*, http://www.fl.nesinc.com/FL_TIGS.asp, (last visited March 5, 2019).

²³ Rule 6A-4.0021(4)(b), F.A.C.

²⁴ Rule 6A-4.0021(7)(b), F.A.C.

²⁵ Florida Department of Education, *FTCE Test Structure Information* (May 29, 2018), available at <http://fldoe.org/core/fileparse.php/5627/urlt/FTCE-Test-Structure.pdf>.

For those school districts that conduct a professional development program that includes a two-year mentorship program, the bill allows a school board to waive the GKT requirement for candidates who do all of the following:

- successfully complete the two-year mentorship program;
- receive a recommendation from his or her mentor and principal; and
- fail to earn the required passing scores on the GKT after receiving support from the school district.

The bill increases access to GKT preparation materials available to candidates by requiring professional certification and education competency programs to provide candidates with access to materials and support to prepare for the GKT. Additionally, the bill requires the DOE to provide access to GKT preparation resources at no cost to candidates.

Teacher Preparation Programs

Present Situation

The National Council on Teacher Quality (NCTQ) reports that new teachers consistently identify classroom management as a challenge. The report concludes that better classroom management preparation will mitigate some of the difficulties faced by first-time teachers. Further, the NCTQ recommends teacher preparation programs gather information from their graduates and their employers about classroom management issues they are encountering. This information can be used to adjust instruction based upon research-based strategies.²⁶

According to the Hope Street Group, strengthening preservice experience curricula is an important element of improving teacher preparation. Accordingly, the report concludes that teacher preparation should include the real challenges of the profession—the rapid increase in service to high-need/persistently low-achieving populations, and a shift in focus on standards instruction. Including coursework that is directly connected to classroom experience will further prepare teachers for the realities of the classroom.²⁷

In Florida, teacher preparation programs are accountable for producing individuals with the competencies and skills necessary to achieve the state education goals.²⁸ Review and approval of school district-operated teacher preparation programs by the DOE consists of two parallel systems - one for initial approval and one for continued approval. There are requirements delineated in both current law and SBE rule for initial program approval and continued program approval. Continued approval of a state-approved teacher preparation program is based upon: evidence that the program continues to implement the requirements for initial approval; significant, objective, and quantifiable measures of the program; and the performance of program completers.²⁹

The SBE must adopt rules to establish uniform core curricula for each state-approved teacher preparation program.³⁰ These rules must include, at a minimum, the following:³¹

- The Florida Educator Accomplished Practices.³²

²⁶ National Council on Teacher Quality, *Training Our Future Teachers: Classroom Management* (January 2014), available at https://www.nctq.org/dmsView/Future_Teachers_Classroom_Management_NCTQ_Report.

²⁷ Hope Street Group, *On Deck: Preparing the Next Generation of Teachers* (March 2016), available at <https://hopestreetgroup.org/wp-content/uploads/2018/03/On-Deck-Preparing-the-Next-Generation-of-Teachers-3.pdf>.

²⁸ Section 1004.04(1)(b), F.S.

²⁹ Florida Department of Education, *Continued Approval*, <http://www.fldoe.org/teaching/preparation/continued-approval.stml> (last visited Feb. 25, 2019).

³⁰ Section 1004.04(2)(a), F.S.

³¹ Section 1004.04(2)(b)1-7, F.S.

³² Florida Department of Education, *The Florida Educator Accomplished Practices (FEAPs)*, <http://www.fldoe.org/teaching/professional-dev/the-fl-educator-accomplished-practices.stml> (last visited Feb. 25, 2019). The Florida Educator Accomplished Practices (FEAPs) are Florida's core standards for effective educators and provide valuable guidance to

- The state-adopted content standards.
- Scientifically researched and evidence-based reading instructional strategies that improve reading performance for all students, including explicit, systematic, and sequential approaches to teaching phonemic awareness, phonics, vocabulary, fluency, and text comprehension and multisensory intervention strategies.
- Content literacy and mathematics practices.
- Strategies appropriate for the instruction of English language learners.
- Strategies appropriate for the instruction of students with disabilities.
- School safety.

Each teacher-candidate must be instructed and assessed on the uniform core curricula in his or her program concentration area during course work and field experiences. Additionally, each candidate must participate in field experience and pass the FTCE.³³

Educator Preparation Institutes (EPIs) are offered by Florida postsecondary institutions or qualified private providers to provide instruction for baccalaureate or higher degree holders who did not earn an education-related degree, resulting in qualification for a temporary teaching certificate.³⁴ EPIs are designed for baccalaureate degree holders to become certified teachers.

Each approved EPI must include, in its annual performance evaluation, employer satisfaction surveys, which are designed to measure the preparation of the educator to enter the classroom setting.³⁵

Effect of Proposed Changes

The bill revises the required criteria for continued teacher preparation program approval to include a survey of program completers' satisfaction with preparation for the realities of the classroom and employers' satisfaction with, and the programs' responsiveness to, local school districts. Each Florida public and private institution must include these surveys in their annual report regarding state-approved teacher preparation programs to the general public.

The bill revises the requirements for uniform core curricula for state-approved teacher preparation programs to include the following:

- Participant instruction and assessment in the Florida Educator Accomplished Practices across content areas.
- The use of state-adopted content standards to guide curriculum and instruction.
- Strategies to differentiate instruction based on student need.
- The use of character-based classroom management.

The bill requires that preservice field experience fully prepares a teacher-candidate to manage a classroom in a variety of challenging environments, including, but not limited to, high-poverty schools, urban schools, and rural schools and that teacher preparation programs include schools serving low-achieving students in the selection of schools for preservice field experience.

The bill requires each approved EPI to include satisfaction surveys of employers and teacher-candidates, rather than just of employers, in its annual performance evaluation submitted to the DOE. These surveys must be designed to measure the preparation of an educator for the realities of the classroom and the EPI's responsiveness to local school districts.

Florida's public school educators and educator preparation programs throughout the state on what educators are expected to know and be able to do.

³³ Section 1004.04(2)(c)-(d), F.S.

³⁴ Section 1004.85, F.S.

³⁵ Section 1004.85(5), F.S.

The bill improves access to district programs for charter school teachers by requiring school districts to make teacher preparation programs available to charter school teachers.

Teacher Mentorship and Professional Development

Present Situation

Professional literature indicates that to improve teacher recruitment and retention first-time teachers should receive induction support during their first two years of teaching.³⁶ Induction programs should be assessed and held accountable to compile actionable data about quality of support and mentoring assistance. Data and findings from such surveys can better inform school improvement planning and help identify specific supports needed by first-time teachers. By hearing directly from first-time teachers, policymakers have the opportunity to make data-driven decisions for developing policies that make schools better places to work and learn.³⁷

In Florida, the DOE is required to create guidelines and identify best practices for the mentors of first-time teachers and for new teacher-support programs.³⁸ Additionally, district school boards must establish a comprehensive staff development program that incorporates school improvement plans and is aligned with principal leadership training.³⁹ However, these programs are not required to specifically address the professional development of first-time teachers.

Pursuant to the School Community Professional Development Act⁴⁰, the purpose of the professional development system is to increase student achievement, enhance classroom instructional strategies that promote rigor and relevance throughout the curriculum, and prepare students for continuing education and the workforce.⁴¹

The DOE must disseminate proven model professional development programs that demonstrate success in increasing rigorous and relevant content, increase student achievement and engagement, meet identified student needs, and provide effective mentorship activities to new teachers and training to teacher mentors.⁴² The methods of dissemination must include a web-based statewide performance-support system including a database of exemplary professional development activities, a listing of available professional development resources, training programs, and available technical assistance.

Effect of Proposed Changes

The bill increases the opportunities for mentorship and professional development and standardizes professional development content through the following provisions:

- Requiring that the guidelines and best practices created and identified by the DOE for the mentors of first-time and for new teacher-support programs focus on the professional assistance needed by first-time teachers through the first two years, rather than the first year, of teaching.
- Requiring school boards to adopt related policies based upon the DOE's guidelines and published best practices and materials.
- Modifying the requirements of comprehensive program of staff development established by each district school board to include support programs for first-time teachers.

³⁶ Liam Goldrick, *Support From The Start: A 50-State Review of Policies on New Educator Induction and Mentoring*, New Teacher Center (March 2016), available at <https://newteachercenter.org/wp-content/uploads/2016CompleteReportStatePolicies.pdf>.

³⁷ Goldrick, *supra* at 28.

³⁸ Section 1012.05(2)(k), F.S.

³⁹ Section 1012.22(1)(i), F.S.

⁴⁰ Section 1012.98, F.S.

⁴¹ Florida Department of Education, *Professional Development in Florida*, <http://www.fldoe.org/teaching/professional-dev/> (last visited February 25, 2019).

⁴² Section 1012.98(11), F.S.

The bill requires the DOE to develop a database that includes teacher induction and mentorship models and standards within the web-based statewide performance-support system.

The bill also authorizes the Commissioner of Education, subject to proviso in the General Appropriations Act, to use funds appropriated by the Legislature, federal grants, and other sources to publish state, district, and school level results of an anonymous biennial survey of school-based instructional and administrative personnel that identifies the teaching conditions related to student learning and teacher retention.

B. SECTION DIRECTORY:

Section 1. Amends s. 1002.33, F.S., revising services required to be provided by charter school sponsors.

Section 2. Amends s. 1004.04, F.S., revising the rules to establish a uniform core curricula for state-approved teacher preparation programs; revising the criteria for continued approval of a state-approved teacher preparation program; requiring a state-approved teacher preparation program to include certain survey results in an annual report; and revising the requirements for certain preservice field experience in such programs.

Section 3. Amends s. 1004.85, F.S., revising requirements for educator preparation programs; and revising requirements relating to annual performance evaluations that EPIs are required to submit to the DOE.

Section 4. Amends s. 1012.05, F.S., revising duties of the DOE for developing guidelines relating to teacher recruitment and retention; deleting a requirements for the DOE to consult with specified entities in the development of the guidelines; revising duties of school boards to adopt policies relating to mentors and support for first-time teachers; and authorizing the Commissioner of Education to use certain funds to publish specified survey results.

Section 5. Amends s. 1012.22, F.S., requiring district school boards to incorporate certain support programs in the establishment of programs for staff development.

Section 6. Amends s. 1012.56, F.S., expanding acceptable means of demonstrating mastery of general knowledge to include documentation that an applicant meets specified requirements; deleting a requirement specifying that a holder of a temporary educator certificate meet a certain requirement within a specified time; conforming a provision to changes made by the act; requiring certain materials and support to be included in a professional development certification and education competency program; authorizing district school boards to waive a certain requirement under specified conditions; and requiring the DOE to provide aspiring teacher with specified resources.

Section 7. Amends s. 1012.59, F.S., requiring certification examination fees to be apportioned to each part of a multipart examination; and requiring applicants to only retake parts of the multipart exam which they failed.

Section 8. Amends s. 1012.98, F.S., revising information required for the DOE to include in the dissemination of certain programs.

Section 9. Provides an effective date of July 1, 2019.

II. FISCAL ANALYSIS & ECONOMIC IMPACT STATEMENT

A. FISCAL IMPACT ON STATE GOVERNMENT:

1. Revenues:

None.

2. Expenditures:

None. The additional duty assigned to the Department of Education in Section 4 of the bill and the provision requiring access to materials and resources in Section 6 can be done within existing department resources.

B. FISCAL IMPACT ON LOCAL GOVERNMENTS:

1. Revenues:

None.

2. Expenditures:

None.

C. DIRECT ECONOMIC IMPACT ON PRIVATE SECTOR:

The revenue change mentioned in the Fiscal Comments below will equate to a projected \$4 million to \$5 million savings for teachers and prospective teachers each year.⁴³

D. FISCAL COMMENTS:

Per section 1012.59(1), F.S., the State Board of Education, by rule, shall establish separate fees for applications, examinations, certification, certification renewal, late renewal, recordmaking, and recordkeeping, and may establish procedures for scheduling and administering an examination upon an applicant's request. Each fee shall be based on department estimates of the revenue required to implement the provisions of law with respect to certification of school personnel. The application fee shall be nonrefundable. Each examination fee shall be sufficient to cover the actual cost of developing and administering the examination.

On March 19, 2019, the State Board of Education adopted an amendment to Rule 6A-4.0021, F.A.C., Florida Teacher Certification Examinations.⁴⁴ The adopted change to the rule lowers the retake registration fees for the General Knowledge Test and the Professional Education Test, as well as lowers the first-time and retake registration fees for all subject area examinations. These registration fee changes will become effective April 22, 2019.

Based on 40,000 examination retakes in 2018 and increasing the temporary certification to three years, the Department of Education estimates that this change may have a potential impact of a \$4 million to \$5 million saved by teachers and prospective teachers each year.⁴⁵

⁴³ Florida Department of Education, Fiscal Analysis email received March 22, 2019.

⁴⁴ Florida Department of Education, *State Board of Education Agenda* <http://www.fldoe.org/core/fileparse.php/18744/urlt/40021.pdf> (last visited March 21, 2019).

⁴⁵ Florida Department of Education, Fiscal Analysis email received March 22, 2019.

III. COMMENTS

A. CONSTITUTIONAL ISSUES:

1. Applicability of Municipality/County Mandates Provision:

None.

2. Other:

None.

B. RULE-MAKING AUTHORITY:

None.

C. DRAFTING ISSUES OR OTHER COMMENTS:

None.

IV. AMENDMENTS/ COMMITTEE SUBSTITUTE CHANGES

Not applicable.