



900 S.W. Jackson Street, Suite 102  
Topeka, Kansas 66612-1212  
(785) 296-3201  
www.ksde.org

February 17, 2020

TO: Senate Commerce Committee

FROM: Mischel D Miller, Director, Teacher Licensure and Accreditation, KSDE

SUBJECT: Senate Bill 366 (Neutral)

Thank you for the opportunity to address KSDE's concerns with Senate Bill 366. The agency already complies with most provisions of the bill, but we believe the current language of the bill carries the risk of unintended consequences. Specifically:

- K.S.A. 48-3406 gave military service members and their spouses preferential treatment and moved them to the front of the line of those Applicants waiting to receive their license. The new definition of "Applicant" actually eliminates this preferential treatment.
- The definition of "Private certification" is too broad. There is no minimum standard as to what constitutes a credential-granting "private organization."
- The 10-day processing time is too restrictive. The Kansas State Board of Education requires every applicant for licensure to submit to a fingerprint-based background check through the Kansas Bureau of Investigation (KBI). Senate Bill 366 would require the agency to issue at least a temporary license even if we have not yet received information from the KBI. We prefer--and believe it is much safer--to fully review an Applicant's criminal history prior to issuing a license rather than revoking it after they are in the classroom.
- Senate Bill 366 allows the agency to not issue a temporary permit if "the licensing body determines...that issuing a temporary permit would jeopardize the safety of the public." However, the bill also requires the agency to provide that determination in writing within 10 days of a complete application. The Kansas State Board of Education makes such determinations through a statutorily created process which can never be completed in 10 days.

For these reasons, the Kansas State Department of Education respectfully request a reconsideration of the term "Applicant" and the 10-day time limit.

*Kansas leads the world in the success of each student.*