

**Analysis of Comments from Public on Proposed Amendments to 603 CMR 7.00 –
Regulations for Educator Licensure and Preparation Program Approval**

June 2012

Key to Abbreviations:

CES: 2 Members of the Collaborative for Educational Services

COMTEC: Commonwealth Teacher Education Consortium

ENC: Eastern Nazarene College

FSU: Fitchburg State University

MABE: Massachusetts Association for Bilingual Education

MACTE: Massachusetts Association of Colleges for Teacher Education

MCCECEA: Massachusetts Community College Early Childhood Educators Association

MTA: Massachusetts Teachers Association

SHC: Stonehill College

SMC: Simmons College

SMCAC: Advisory Council for Department of Education at Simmons College

SMCESL: MATESL Faculty at Simmons College

SPC: 4 Faculty Members at Springfield College

TEC: The Education Cooperative

WSU: Westfield State University

Contributor	Proposed Changes	Department Response and Recommendation
I. Section 7.02 – Definitions		
MACTE, ENC, SHC, WSU	<p><u>Recommended Language:</u> Field-Based Experiences: “over the course of the preparation program, field based experience shall cover a range of time periods within the school year (Fall, Winter, Spring)”</p> <p>This will create financial and academic hardships, especially for students. The P-12 school year and the college school year do not line up, especially in late May and June.</p> <ul style="list-style-type: none"> • Students are not available to complete placements in P-12 schools when they are not taking courses. Mostly, they are working to cover tuition costs. • Financial aid ends when the collegiate semester ends (early May); • Students on grants, such as Pell grants, will have no financial means to live beyond the semester; • Dorms close after finals and do not open prior to the beginning of the semester; students would have no place to live. • Practicum students will no longer be covered by the university’s liability insurance policies which end when the semester ends. • For institutes of higher education, supervision of “off semester” placements creates load in an additional semester...requiring additional coverage and corresponding compensation. • For P-12 programs, many P-12 programs have a policy that would make hosting pre-practicum students hard at the very end and very beginning of the year. 	We understand these concerns and have modified the definition. Please see section 7.02.
SPC	<p><u>Recommended Language:</u> “Field-Based Experiences: Field-based experiences shall include experiences that cover different phases of the academic year (i.e. fall, winter, spring) OR whenever possible, field-based experiences should cover the full academic year (through the last day of school), at the very least these experiences should cover the different phases of the academic year.</p> <p>The requirement that “Field-Based Experiences shall include experiences that cover the full academic year” is a problem for traditional teacher preparation programs housed in Institutions of Higher Education because our calendar and that of the public schools are not aligned. There are a number of logistical issues with requiring program completers to be in the field in late May and the month of June.</p>	See above
MTA	<p><u>Recommended Language:</u> Field-Based Experience: Experiences such as observation of a variety of classrooms, pre-practicum, practicum/practicum equivalent, internship, apprenticeship, or administrative internship that are integral components of any program for the preparation of educators. Field-based experiences shall include experiences that cover the full academic year are regularly spaced over the course of an academic year.</p> <p>Public schools almost always have a full academic year different from the full academic year of the higher education institutions with teacher preparation programs. Typically public schools open earlier and end</p>	See above

	later than higher education institutions. Adopting this language, as applied to Superintendent Internships, captures the intent of requiring a range of experiences throughout a school year without having to resolve the issues around the different years in K-12 and higher education.	
SMC	<p><u>Recommendation:</u> There should be some flexibility in the requirement that field-based experiences to last the full academic year, permitting observations to begin during the second or third week of school.</p> <p>Requiring field-based experiences to include the first week or weeks of school will be problematic for students who will be doing their practicums in the spring. It is very difficult to have students placed and ready to start pre-practicum observations on the first day of the school year.</p>	See above
COMTEC, MACTE, MTA, ENC, SMC, SHC, SPC, WSU	<p><u>Concern:</u> Field-based experiences/pre-practicum</p> <p>The full range of the <i>PreK-12 school year</i>: This poses many problems for IHEs. Candidates do not have access to on campus housing/meals prior to the beginning of the university school year and after the end of the school year. Contractually, the state universities cannot begin the fall semester prior to September 1 and cannot extend the spring semester after May 31. Experiences outside this date range cannot be integrated into coursework because courses that haven't started or have already ended. There may be liability issues, as well.</p>	See above
MTA, FSU, Professor	<p><u>Remove:</u> the requirement that Field-Based Experiences last the full academic year, defined as “The time period between the opening of a school at the beginning of the official school year and the closing of the school at the end of the official school year.”</p> <p>Candidates do not have access to university housing at the beginning and end of the public school year. Additionally, they are not enrolled in courses so experiences cannot be supervised and integrated into courses (as required under the definition of prepracticum and practicum). Contractually, candidates are not under the supervision of the college personnel prior to the beginning of the institutional academic year. This presents a liability issue for sites and universities.</p>	We agree and have amended the definition of Field-Based Experiences to address this issue. Please see Section 7.02.
MTA	<p><u>Recommend:</u> Alternative Preparation Organization: An organization, other than an institution of higher education, that prepares individuals for educator licensure. The organization could be sponsored by a school district, educational collaborative, professional association, or other non-higher education institution.</p> <p>Preparation programs should always be under the purview and control of the profession, not outside vendors.</p>	As written, the regulations are inclusive of all types of state approved educator preparation program providers. No change needed.
FSU	<p><u>Remove</u> the definition “Alternative within an Institution of Higher Education”</p> <p>Alternative programs have historically not been recognized as acceptable for out-of-state verification of completion of an approved initial licensure program. Consequently, moving forward with this definition</p>	In the current NASDTEC Interstate Agreement, there is a definition of approved programs that contains “traditional” and “non-traditional”

	could eliminate the ability for post baccalaureate certificate completers to earn licensure in another state.	programs and as such the Interstate Agreement makes no distinction between the programs. Each respective state must complete a “Jurisdiction Specific Requirement (JSR)” and it is through the JSR that specific details about any ancillary requirements may be made. No change needed.
MACTE, COMTEC, WSU	<p><u>Request for Clarification:</u> “Alternative within an Institution of Higher Education”</p> <p>What does the word Alternative mean? Does this mean that the program resides in the state? Is this only for the Initial License or also referring to the Professional license?</p> <p>More information is needed. How does this affect reciprocity agreements through NASDTEC? Are licensure programs embedded within a graduate degree program (complete the licensure requirements with or without the degree) defined as alternative?</p>	See above.
FSU, SMC	<p><u>Request for Clarification:</u> Please provide a definition of diverse student learners.</p> <p>Does this refer to race, socio/economic background, language proficiency, learners with special needs? A clearer definition would be helpful.</p>	The guidelines will clarify “diverse student learners.”
CES	<p><u>Recommended Language:</u> Approved Preparation Program: A program approved by the Commissioner to prepare teachers to meet the requirements for educator licensure in the Commonwealth of Massachusetts.</p> <p>The revisions to this definition in the amendments are not clear and will do damage to students who intend to leave Massachusetts upon graduation or who live out of state but do work in hybrid online courses.</p>	As written, the regulations do not impact candidates seeking licensure outside of Massachusetts via the NASDTEC agreement. No change needed.
CES	<p><u>Recommended Language:</u> Program Approval: State authorization of an educator preparation program or its sponsoring organization to endorse program completers prepared in Massachusetts licensure programs for educator licensure in the Commonwealth of Massachusetts.</p> <p>The revisions to this definition in the amendments are not clear and will do damage to students who intend to leave Massachusetts upon graduation or who live out of state but do work in hybrid online courses.</p>	See above.

MTA	<p>Recommended Language: Program of Study: The coursework, seminars, workshops, webinars, field experiences, and other program requirements components that are required for the completion of an approved program.</p>	We agree and made this change.
CES	<p>Concern: Supervising Practitioner: How shall a program know that a prospective “supervising practitioner” has an evaluation rating of proficient or higher? School districts will not easily provide that information to licensure programs, nor will teachers wish this information to be provided. Furthermore, this definition does not indicate whether the evaluation is for the current year, a previous year, or many previous years.</p>	This requirement will be clarified in guidelines, along with a transition period as districts fully implement the new Educator Evaluation System. Principals will be expected to provide preparation programs with a complete list of eligible and interested individuals to serve in this role.
MTA	<p>Recommended Language: Supervising Practitioner: The educator who has at least three full years of experience under an appropriate initial or Professional license and has received an evaluation rating of proficient or higher, under whose immediate supervision the candidate for licensure practices during a practicum. For the educator of record, a comparably qualified educator will function as the supervising practitioner during the practicum equivalent.</p> <p>When the Teacher Developer (or equivalent) license endorsement has been developed and approved, supervising practitioners, if available, shall be required to have the endorsement.</p> <p>MTA believes that this responsibility should be undertaken only by trained established educators with significant experience.</p>	As written, the regulations allow for and require the most appropriate and qualified currently licensed educators to act as supervising practitioners. No change needed.
COMTEC, MTA, WSU	<p>Concern: The Supervising practitioner addition of the provision “and has received an evaluation rating of proficient or higher”</p> <p>How is information about teacher ratings provided to IHEs for placement purposes? Does this apply to prepracticum supervising practitioners or only practicum supervising practitioners? Will placements be permitted in schools that are not yet using the new Educator Evaluation System?</p> <p>The addition of the provision “and has received an evaluation rating of proficient or higher” in our opinion could make it more difficult to obtain placements with teachers in urban settings. We are concerned that the new evaluation system could adversely impact the ratings of teachers in urban districts who often have significantly more challenges to overcome than their suburban counterparts. Teachers in urban districts also face distinctly different challenges than their non-urban colleagues. We believe that, in some cases, this could result in lower evaluation scores due to conditions that are not under the teacher’s control. We are not saying that this would occur 100% of the time, but the combination of a new evaluation system and the addition of the requirement for the supervising practitioner to have a</p>	These ratings would apply only to the supervising practitioner for the practicum, not the prepracticum. This requirement will be clarified in guidelines, along with a transition period as districts fully implement the new Educator Evaluation System. Principals will be expected to provide preparation programs with a complete list of eligible and interested individuals to serve in this role.

	<p>proficient or higher rating could adversely impact the pool of available supervising practitioners in urban settings.</p> <p>A second concern for us is we assume that teacher evaluation ratings legally cannot be disclosed to IHEs seeking to place teacher candidates. What mechanisms would be in place to protect the privacy rights of teachers and yet enable the IHEs to place teacher candidates with teachers who have proficient or higher ratings?</p>	
SMC	<p><u>Recommended Language:</u> Endorse: The action taken by a sponsoring organization when a program completer has <i>successfully</i> completed all of the approved program requirements <i>and has been recommended for licensure...</i>”</p> <p>On the rare occasion when we do not recommend a student for licensure at the end of the practicum we do not feel that such a student should be endorsed.</p>	We have amended the definition to include the term “Successfully” in Section 7.02.
COMTEC	<p><u>Eliminate:</u> the example Northeast Regional Credential</p> <p>The Northeast Regional option no longer exists; it was “sunsetting” in 2006</p>	The inclusion of this credential allows for flexibility should future regional credentials come into existence. No change needed.
MTA	<p><u>Recommended Language:</u> Teacher of Record: One or more teachers who are assigned primary responsibility for a student’s learning in a subject, grade or course.</p>	We agree and modified the definition.
COMTEC	<p><u>Support:</u> Clarification about the Temporary Substitute Teacher is very helpful.</p>	We agree.
MTA	<p><u>Recommended Language:</u> Temporary Substitute Teacher: An educator who is employed, on a temporary basis, for less than 90 consecutive school days in the same role position, to take the place of a regularly employed educator who is absent. Any temporary substitute teacher who assumes the responsibilities of a teacher of record Any educator who is employed on a temporary basis for more than 90 consecutive school days in the same role must either be licensed for the role or working under a hardship waiver.</p> <p>The law recognizes that occasional short term absences are unavoidable and it may not be feasible for a district always to have properly licensed personnel available to cover the absence, especially on short notice and for brief durations. On the other hand, when a substitute teacher begins to fulfill the role of a teacher of record, it is reasonable that the district be held to the same standard as for the teacher whose place the substitute is taking.</p>	By requiring that a temporary substitute be licensed or under a waiver before assuming the duties of a teacher of record, the recommended language does not provide districts flexibility when faced with having to replace a teacher of record on short notice. In addition, the recommended language appears to create a loophole in which a substitute that does not assume the responsibility of a teacher of record would not need to be licensed or under a waiver.
II. Section 7.03(1) – Program Approval		
MTA	<p><u>Recommendation:</u> Candidates may qualify for licensure through successful completion of an approved preparation program leading to the license sought, providing they meet all other requirements.</p>	Massachusetts participates in the NASDTEC Agreement. No change

	<p>Individuals who complete approved preparation programs are may be eligible for licensure reciprocity with other states that are parties to the NASDTEC Interstate Contract Agreement.</p> <p>It is inappropriate for Massachusetts regulations to suggest what other states are willing to do with or without any reciprocity agreements.</p>	needed.
MACTE, WSU	<p><u>Recommendation:</u> (e) Program approval will be for a period of seven years from the date of program receipt of the report of approval and recommendations.</p> <p>There are times when program approval notification and recommendations have been held up for extended periods of time yet the approval time period has not been adjusted. This results in delays in implementing recommendations as well as reducing the time frame that approval is enjoyed.</p>	While we understand the issues with the timeliness of the reports, seven years from the time of each visit is sufficient to make programmatic changes. No change needed.
III. Section 7.03(2) – Program Approval Standards		
SPC	<p><u>Eliminate:</u> The requirement in 7.03(2)(e) that all program completers for the professional license do some type of fieldwork, or add a requirement for the professional license that in addition to 3 years of experience, candidates must have been rated a proficient teacher on the new evaluation system.</p> <p>The new language would require all program completers for the professional license to do some type of fieldwork through which their performance could be assessed, which is not consistent with the requirements for advancing the initial license to a professional license.</p>	This assessment is not required to be performance based. No change needed.
MACTE, MTA, WSU	<p><u>Recommendation:</u> Continuous Improvement: Change “data driven” to “evidence-based”</p> <p>To describe the variety of information that would effectively inform programs of compliance and effectiveness.</p>	We agree and have made the change.
COMTEC	<p><u>Request for Clarification:</u> Continuous Improvement</p> <p>What are institutional reporting requirements and process regarding continuous improvement? Is race, ethnicity and diversity how the state is defining diversity?</p>	This will be clarified in guidelines.
MTA	<p><u>Eliminate:</u> Section 7.03 (2) (d) 1 (Initial License – Subject Matter Knowledge) & 2. (Professional License – Subject Matter Knowledge) and Section 7.03 (2) (e) 1. (Initial License – Professional Standards for Teachers) and 2. (Professional License – Professional Standards for Teachers)</p> <p>These definitions add unwarranted distinctions. MTA believes that any educator should have both sufficient knowledge and skills before receiving any license.</p>	These definitions reflect the distinctions between initial and professional licensure. Further, the regulations distinguish between knowledge and skills because subject matter knowledge is inherently different from teacher professional standards. No change needed.
MACTE, WSU	<p><u>Recommended Language:</u> 7.03(2)(e) Ensure that program completers have been assessed and mastered</p>	The educator evaluation rating

	<p>the professional Standards for Teachers at the level of professionally licensed teachers In addition to the 3 years of experience, candidates must produce documentation of a minimum rating of “proficient teacher” in the state assessment system.</p> <p>This point seems to imply a practicum/field work requirement to assess performance. This is not in effect at this time and would not be a good addition.</p>	<p>system is designed for the purpose of employment, not licensure. No change needed.</p>
<p>MACTE, SHC, WSU</p>	<p><u>Recommended Language:</u> (g) Educator Effectiveness: Analyze and use: state administered evaluation ratings of program completers, employment data on program completers teaching in the Commonwealth , results of survey data, and other available data to improve program effectiveness”</p> <p>It would appear that the only completers that we would have consistent and reliable information on would be those in the Massachusetts data base. Completors who leave the state cannot be expected to provide us with updated information.</p>	<p>We have modified this based on concerns. Please see Section 7.03(2).</p>
<p>COMTEC, MTA</p>	<p><u>Concern:</u> Educator effectiveness</p> <p>How will approved programs obtain the evaluation data (and other data not collected by the institution)? How is this requirement different from continuous improvement?</p> <p>MTA is concerned about the privacy implications of this proposal. Evaluation rating data are probably already protected. Aggregated employment data, assuming a sufficiently large groups size, is probably sufficiently protective of confidentiality. “State administered surveys” do present some concerns since the survey results are public documents.</p>	<p>Preparation programs will not have access to individual evaluation data.</p> <p>Evaluation data is not subject to public disclosure per the BESE’s Evaluation Regulations (603 CMR 35.00). State law prohibits ESE from releasing confidential information.</p> <p>ESE will be publicly reporting aggregate data only.</p> <p>We have addressed some of the recommendations outlined in the policy brief (i.e. requirement for preparation program and district partnerships and increased field experiences and connections to seminars). However, we are not making changes in some areas identified in <i>Tomorrow’s Teacher</i>, in these regulations at this time. ESE will consider these comments</p>

		and recommendations going forward.
COMTEC	<p><u>Concern:</u> Collaboration with School Districts</p> <p>Collaboration is a two-way effort; program providers cannot be held solely accountable for the collaboration efforts.</p>	The Department will work with Educator Preparation programs to help build partnerships with districts. No change needed.
IV. Section 7.03(3) – Preparation		
COMTEC	<p><u>Concern:</u> There continues to be major disparity between the requirements an approved alternative provider must meet for a Professional license and the requirements an IHE must meet.</p>	While we respect the concern, these comments do not reflect the amendments being made to the regulations at this time. ESE will consider these comments going forward.
MTA	<p><u>Support:</u> MTA enthusiastically supports the deletion of “other than education” here and throughout. The current restriction has resulted in much confusion and complications for license candidates.</p>	We agree.
V. Section 7.03(4) – Annual Reporting		
COMTEC	<p><u>Concern:</u> The current Title II/SAR data collection procedures do not match what is required in the current or proposed regulations.</p> <p>The current data collection system only provides for reporting of candidates who are enrolled in first Initial licensure program. The proposed regulations appear to continue to require reporting of all candidates by name, program progress, etc.</p>	SAR/Title II data collection procedures and systems will be updated and improved in the coming year to allow for the data collection in the proposed regulations.
VI. Section 7.03(5) – Public Reporting		
MACTE, SHC, WSU	<p><u>Request for Clarification:</u> (b) Candidate data - What data does this refer to?</p>	Please refer to the candidate data listed in 7.03(4)
MACTE, SHC, WSU	<p><u>Request for Clarification:</u> (c) Faculty and Staff data – what data does this mean? How consistent with other data we report can it be made? (e.g., AACTE PEDS; NCATE)</p>	Please refer to the faculty and staff data listed in 7.03(4)
MACTE	<p><u>Request for Clarification:</u> (i) MTEL Pass rates – “required by the Board at the point of enrollment, completion all coursework, what does this mean? What licensing tests does the Board require at the point of enrollment? Who is going to provide this? Is this aimed at graduates or undergraduates?”</p>	We have modified the language in 7.03 (5) to clarify this.
MACTE, SHC, WSU	<p><u>Recommended Language:</u> (k) Aggregate Employment Data of Program Completers – “aggregate employment data of program completers living in the Commonwealth of Massachusetts.”</p> <p>The only reliable data on program completers would be that which is collected by DESE. Completers who leave the state cannot be expected to report and the integrity of the data would be compromised.</p>	We have modified the language in 7.03 (5) to clarify this.
MACTE, SHC, WSU	<p><u>Eliminate:</u> (l) Aggregate evaluation ratings of program completers</p>	Please see modified language in

	How long after candidates leave will prep programs be held accountable for their completers? How will DESE account for mediating factors inherent in schools and school districts? Are prep programs expected to have access to evaluations of program completers? If so, how would we get this information?	7.03 (5).
COMTEC	<u>Request for Clarification:</u> (I) Aggregate evaluation ratings of program completers How will “aggregate evaluation ratings of program completers” be collected? Who is responsible for the data collection? How will the data be presented? What statistical analyses will be used?	See above.
COMTEC	<u>Request for Clarification:</u> What does “district personnel” mean in terms of public reporting?	This will be clarified in guidelines.
VII. Section 7.03(6)&(7) – Revoking Approval and Restoring Approval		
VIII. Section 7.03(8) – Implementation		
SPC	<u>Recommendation:</u> The deadline for the implementation of new reporting requirements should be mid-April 2013. The new deadline should be aligned with the State Annual Report (SAR) that all organizations have to submit.	We agree and have modified the language, see 7.03 (8).
FSU	<u>Recommendation:</u> Please amend the implementation date from June 30, 2013 to August 31, 2013. The new date will coincide with the Institutional academic years and the governance process required for course approval and catalogue revision.	We agree and have modified the language, see 7.03 (8).
IX. Section 7.04(2)(c) – Professional		
COMTEC	<u>Support:</u> Thank you for the making changes so that teachers may have opportunities to develop advanced pedagogical knowledge and skills as part of their licensure advancement activities.	We agree.
MTA	<u>Recommended Language:</u> ii. A master’s degree program or other advanced graduate program in the academic discipline appropriate to the the subject matter knowledge or pedagogy based on the subject matter knowledge of the license sought in a graduate or professional school other than education. This MTA proposed change is consistent with the proposals elsewhere in the amendments to the regulations.	This is one option to earn a professional license and allows someone to use a content Master’s degree to earn the professional license. No change needed.
X. Section 7.04(4) – Requirements for Field-Based Experiences		
SMCESL	<u>Concern:</u> Requiring field based experience during the first weeks of the school year may actually represent a burden for certain districts where ESL teachers are heavily involved in intake, testing, translation and other interaction with families, etc., in those early days; taking on responsibility for a student teacher or pre-practicum student at that time may not be a welcome task for the school staff despite its being an ideal exposure for the teacher in training. Although not a typical response, this has occasionally come up for our full-year ESL practicum placement; the impact of the requirement on the districts should be noted.	Please see the revised definition of Field-Based Experiences in Section 7.02.
COMTEC, MACTE,	<u>Support:</u> the requirement for 300 hours of practicum for all teaching licenses. Therefore, the change in	We agree.

MTA, ENC, SPC, SHC, WSU	<p>practicum hours indicated makes sense.</p> <p>MTA supports substantial increases in pre-service field experience, not only at the practicum/practicum equivalent level but at the pre-practicum as well. (see MTA cover letter and <i>Tomorrow's Teachers</i>)</p>	
Teacher	<p><u>Eliminate:</u> Increasing the requirements for potential teachers is ridiculous and detrimental to the teaching profession.</p> <p>It is important to have field based experiences, but keep in mind that most people are taking time away from their jobs in order to complete this requirement.</p>	<p>The increased hour requirements ensure that teachers have sufficient practical experience necessary to support their effectiveness upon employment. Many organizations already have these additional hours included in their programs and these changes have been supported by several associations and organizations across the state. No change needed.</p>
COMTEC, MACTE, SMCAC, SHC	<p><u>Recommendation:</u> The Moderate Disabilities 5-12 practicum should be increased to 300 hours. The breakdown for settings should be as with Moderate Disabilities PK-8.</p>	<p>We agree and made the change to increase the hours.</p>
MACTE, ENC, WSU	<p><u>Recommendation:</u> Note with each of the new 300 clock hour requirements that these program completers must complete a minimum of 300 clock hours, but that these experiences could occur at more than one grade range (e.g., 5-8 and 8-12 or PreK-6 and 5-12) with a minimum of 150 clock hours being done at each level, including a minimum of 100 hours of full teaching responsibility at each level.</p> <p>For the licenses that have multiple grade levels (i.e. Phys Education), it makes sense to allow them to choose to do hours in two settings of different levels. If for example Physical Education students are required to do 300 hours of practicum at each level (PreK-8 and 5-12), this adds an additional semester to a student's program that results in a significant cost to the student.</p>	<p>We will examine this possibility through Guidelines.</p>
SPC	<p><u>Recommendation:</u> Put asterisks after each of the new 300 clock hour requirements and then add a statement that makes it clear that these program completers must complete a minimum of 300 clock hours, but that these experiences could occur at more than one grade range (e.g., 5-8 and 8-12 or PreK-6 and 5-12) with a minimum of 150 clock hours being done at each level, including a minimum of 100 hours of full teaching responsibility at each level.</p> <p>For some programs it makes sense to give students the opportunity to spread the 300 clock hours over 2 grade levels. In almost every case these program completers can qualify for a license at both grade levels anyway. If they are required to do 300 clock hours at one grade level then they will undoubtedly add the other grade level. The program completers typically take a development course that spans birth through</p>	<p>See above.</p>

	<p>adolescence. It seems better to allow these program completers to do two 150 clock hour experiences at two different grade levels. This way they still do a minimum of 300 clock hours and get experience teaching at two different grade levels.</p>	
COMTEC	<p><u>Recommendation:</u> Differentiate practicum hours for administrator licenses, with a minimum of 300 hours for any license. Example: supervisor/director 300 hours; principal/asst. principal 400 hours; special education administrator, superintendent 500 hours; others 300-400 hours.</p>	<p>We agree and have made some differentiations, see section 7.04 (4) and 7.09.</p>
MACTE, MTA, WSU	<p><u>Recommend:</u> For administrator candidates with prior teaching experience or a teaching license, adjust practicum hours. Administrators with no prior teaching or educational experience should have practicum of 500 hours.</p> <p>We recognize that people in administrator license programs with no prior experience in a school setting would need a practicum of this length. However, for licensed educators this is excessive and a hardship especially for those needing to leave a paid position for the practicum/internship.</p>	<p>See above.</p> <p>Programs can make a decision on a case-by-case basis using the waiver option.</p>
FSU, TEC, Professor	<p><u>Eliminate:</u> the new requirement of a 300 hour practicum for teachers and a 500 hour practicum for administrators.</p> <p>Most of those seeking these licenses are currently in teaching positions in our schools. We have some well-qualified individuals who are willing to take on the expense of engaging in required coursework. In order for them to complete 500 hours in a practicum, they would have to take an unpaid leave from their teaching duties. There are not enough hours in summers, unassigned school time and evenings for them to complete these requirements without doing so.</p> <p>Adding an additional 200 hours to the practicum at the local level will not necessarily improve the quality of the experience or future practice. In fact, depending on the setting, it could comprise development. Additionally, most individuals seeking licensing at this level arrive with complex life circumstances that leave little room for financial hardships. Due to the litigious nature of special education, local districts are reluctant to hire unlicensed directors of special education on a waiver while they complete practicum requirements. As a result, students are forced to take leaves of absences from their jobs which are an 8 week commitment for 300 hours, suffering a financial penalty.</p> <p>We have found that our candidates are able, between their own experiences as teachers, pre-practicum experiences, and practicum experiences, to cover all of the current state knowledge requirements and ELCC national standards to various, yet appropriate levels. Further, we feel optimistic that they can cover the new standards in this amount of time.</p> <p>Candidates can't fully practice in some of the requirement areas due to union and school policies. For</p>	<p>See above.</p>

	<p>example, unless in the vocational setting, candidates can do little with budgets; they cannot specifically be involved in hiring (unless as part of a committee, but even that role is limited); they can do little if anything in regard to managing facilities; they understand and become involved in the legal aspects of the school; they remain involved in the school vision on the periphery, as well as heavily involved in curriculum and bringing best practices to the school. Increasing the required practicum hours is not likely to change the availability of these opportunities.</p> <p>Increased practicum hours creates a hardship on both candidates and site supervisors. The candidate will be required to give more time to the school without compensation and at their own expense. We do not believe that a 500 hour practicum is feasible in one semester. This will create a hardship on candidates when most candidates already have teaching and other responsibilities.</p> <p>Also, the additional practicum hours for the candidate will increase the commitment in time of current administrators who serve as site supervisors. These individuals are quite busy with issues needing immediate attention necessarily the top priority. We believe that most site supervisors/administrators will resist mentoring Administrator candidate with the additional practicum/supervision hours.</p> <p>It is not the quantity of hours but rather the quality of activities and projects that prepare candidates for educational leadership roles. This should be the evaluative focus of new Administrator programs of study. We believe that if these new practicum requirements are implemented, they will negatively impact the number of individuals seeking licensure. It is already a challenge to encourage outstanding teachers to pursue administrative roles.</p>	
MTA	<p><u>Concern:</u> Practicum hours for Special Education Administrator and School Business Administrator</p> <p>These candidates must already have at least an Initial educator license.</p>	See above.
MTA, FSU	<p><u>Request for Clarification:</u> Define “Full Responsibility”</p> <p>With the increased accountability on classroom teachers for student achievement, it will become more difficult to recruit supervising practitioners with the expectation that they must relinquish their classrooms for upwards of 3 weeks.</p> <p>100 hours is approximately equivalent to a month of school in an elementary school and a full semester of a middle school or high school course.</p> <p>“Full responsibility” without definition raises a number of concerns including, but not limited to:</p> <ul style="list-style-type: none"> • The liability of the school district, the sponsoring institution and the candidate and • The attribution of student learning growth to the supervising practitioner who will have had no 	We understand the challenges of partnerships. The 100 hours do not have to occur in one block; they may occur at different points. This will be further clarified in guidelines.

	responsibility for a significant period of the school year.	
MACTE, FSU, WSU	<p><u>Recommended Language:</u> All practicum/practicum equivalents shall be completed within a Massachusetts public school approved private special education, a school that requires Massachusetts educator licensure, or a practicum setting with curriculum referencing the MA Common Core Frameworks.</p> <p>Leaving this definition as is will unnecessarily impact some programs that are now recognized as strong teacher prep programs and partnerships. (For example: some programs near state borders are successfully using schools that are in the adjoining states but requiring the candidate to reference MA Frameworks. Teachers in those programs would be licensed but not necessarily in MA)</p>	Waivers for this requirement may still be issued for individuals by Sponsoring Organizations.
SPC	<p><u>Recommendation:</u> Allow programs to waive the requirement that the practicum/practicum equivalent be conducted in a Massachusetts public school on a case by case basis.</p> <p>This requirement poses a problem for organizations located close the MA state line where candidates are at times placed in another state.</p>	See above.
CES	<p><u>Eliminate:</u> 7.04(4)</p> <p>OR</p> <p><u>Recommended Language:</u> “All practicum/practicum equivalents shall be completed within a Massachusetts public school, approved special education school, or a school that requires Massachusetts educator licensure or a school that oversees a practicum/practicum equivalent based on mastery of the Massachusetts Professional Standards for Teachers, the Massachusetts Professional Standards for Administrative Leadership, and/or the Massachusetts Curriculum Frameworks.”</p> <p>People in our neighboring states and people who work in private schools are capable of reviewing and mastering these standards. If these schools do not have a teacher, supervising practitioners who meet these requirements may travel to oversee a teacher just across the border or in a private school. People in these settings should not be precluded from obtaining a license.</p>	See above.
MCCECEA	<p><u>Eliminate:</u> Language that “All practicum/practicum equivalents shall be completed within a Massachusetts public school, approved private special education school, or a school that requires Massachusetts educator licensure.”</p> <p>This language appears to violate the Massachusetts Department of Higher Education <u>Revised 2011 Early Childhood Transfer Compact</u>. In the proposed amendments Massachusetts’ receiving colleges/universities would be prevented from accepting, as the PreK-K half of student teaching, a practicum completed in any licensed or NAEYC accredited Child Care or Head Start programs throughout the state. It would negate the</p>	We have modified the language to include EEC approved preschool settings, see section 7.04 (4).

	<p>language in the 2011 EC Transfer Compact which explicitly includes the expectation that colleges accept these valued experiences as student teaching practicum credits. <i>“An early childhood education practicum working with children in a field placement that includes at least 150 hours over a minimum of 8 weeks in PreK-K education (includes pre-school settings approved by EEC) and be accompanied by a theoretical component that integrates the practicum experience, the EEC core competencies, and ESE Professional Standards for Teachers (PST).”</i> Our organization members have a great deal of knowledge and expertise on this subject and should be included in a dialogue to make the necessary adjustment to the proposed amendment. Regulations for Educator Licensure and Preparation Program Approval should permit transfer of an early childhood practicum completed in approved EEC settings as set forth in the Revised 2011 EC Transfer Compact. We urge you to consider these facts and contact MCCECEA for further discussion.</p>	
<p>XI. Section 7.06(9) – English Language as a Second Language</p>		
<p>COMTEC</p>	<p><u>Recommendation:</u> Use person first language throughout this section and the entire document (e.g. students who are English language learners).</p>	<p>In the ESE style guide, students whose first language is not English and whose English proficiency does not allow them to fully participate in a mainstream classroom are defined as ELLs or English language learners. ESE agrees with this denomination for consistency purposes.</p>
<p>MABE</p>	<p><u>Recommendation:</u> The “place holder” of 603 CMR 7:06 section (9) (b) the requirements for an optional endorsement in Transitional Bilingual Learning for PreK-6 and 5-12 not be deleted.</p> <p>The current regulations, 603 CMR 7.00 <i>Regulations for Educator Licensure and Preparation Program Approval</i>, do not address the teacher qualifications required to teach in a dual language education program.</p>	<p>The TBL endorsement has not been deleted; it has been included in the Endorsement section (7.14).</p>
<p>MABE</p>	<p><u>Recommendation:</u> Replace the Transitional Bilingual Learning Endorsement with a Transitional Bilingual Education license and create a new Dual Language Educator (DLE) license to address the teacher qualifications appropriate for educators teaching in the different types of program models described in M. G.L. Chapter 71A.</p> <p>The current regulations do not address the teacher qualifications required to teach in a dual language education program. Transitional Bilingual and Two-Way Education programs require teachers who demonstrate competency in teaching English as a Second Language (ESL) and in teaching in a language other than English. English-specific endorsements and licenses proposed in the RETELL initiative do not adequately reflect the competencies required, nor equitably prepare highly qualified teachers for multiple</p>	<p>ESE did not propose any substantive changes to the Transitional Bilingual Learning Endorsement. The substantive changes proposed in this comment would require another public comment process. ESE will consider these comments going forward.</p>

	<p>types of dual language education programs serving students in Massachusetts. The subject matter knowledge and application of skills required to teach both Common Core content and language standards in a dual language education program must include a comprehensive knowledge of culture and applied linguistics, as well as a breadth and depth of pedagogy for teaching multiple language groups (Center for Applied Linguistics). A transitional period should be established to enable teachers who are currently working in dual language programs to obtain a (DLE) license</p>	
SMCESL	<p><u>Support:</u> We are delighted to see the description of the ESL license move beyond the detailed focus on reading that characterized its last iteration and may have reflected the deep expertise of its principal writer, Sandra Stotsky, who shouldered much of the burden of that revision.</p> <p>Literacy is key of course and its centrality to a learner’s success shows in the fact that all teachers in all subject areas are responsible for promoting literacy. However, other areas of language development fall squarely, and only, in the purview of the ESL teacher, meaning that no other teacher shares responsibility for monitoring and fostering development in those areas.</p>	We agree.
SMCESL	<p><u>Recommendation:</u> Current 2. Language acquisition and literacy development We propose that Item be split and developed as follows: “new #2. Language acquisition” keep existing requirements a) and f) “new #3. Literacy Development” keep existing items b, c, d, e ... g, h. “new #4. Oral Language Development” keep existing item i). add: <ul style="list-style-type: none"> • strategies for teaching listening comprehension • key features for comprehensibility in spoken English • approaches and practices for teaching pragmatic and social language skills such as use of questions, politeness strategies, conversation repairs • English vocabulary essential to life outside the classroom “new #5. Academic strategy development” keep existing requirement j) add: <ul style="list-style-type: none"> • Development of metalinguistic skills and vocabulary appropriate to cognitive, academic, and language proficiency levels. <p>Item 2 is so densely focused on literacy that other aspects of language development are eclipsed and may be shortchanged in ESL teacher preparation, in particular oral language development and metalinguistic awareness.</p> </p>	We believe these concepts are covered in the new subject matter knowledge requirements, with the exception of: “Development of metalinguistic skills and vocabulary appropriate to cognitive, academic, and language proficiency levels” under 2, which we have added.

SMCESL	<u>Recommended Language:</u> Current 3. Instructional approaches and best practices for teaching ESL . In requirement (b), the words “From the primary grades on” do not seem appropriate for the ESL LICENSE GRADES 5-12. Please consider instead “from the lowest levels of proficiency on”	We consider that grade is an important aspect to take into consideration and “from primary grades on” intend to reflect “all grades” including 5-12.
SMCESL	<u>Recommended Language:</u> Current 4. Socio-cultural and socio-emotional considerations in teaching ESL Typo: “ion” for the word “in” in requirement d.	This has been corrected.
SMCESL	<u>Recommendation:</u> Current 5. Formal and informal English language assessment procedures and instrumentsas well as possible differentiation from learning disabilities. This item by itself seems fine. However it is conflated with the item numbered (b) below which is probably intended to be a separate item.	These items, although both related to assessment, are not conflated. 5) refers specifically to current assessments and differentiation
SMCESL	(b) The following shall be included in an approved program but will not be addressed on the subject matter test... The content of this item seems appropriate but not its conflation with the item above it.	We do not consider these to be conflated: Item (b) 3 intends to cover advances in the field of ESL, which include assessment advances.
XII. Section 7.09 – Licenses and Routes for Administrators		
MACTE, WSU	<u>Eliminate:</u> b. An administrative apprenticeship/internship (3500 hours) in the superintendent/assistant superintendent role with a trained mentor, using Department guidelines. Given new regulations that put increasing demands on administrators and data that speaks to the effectiveness of present day administrators it is critical that administrators not be given license via “an internship only” route.	ESE will be modifying the Guidelines for this route to licensure. Individuals earning licensure via this option will be required to meet the new practicum hour and performance assessment requirements.
14 School Nurses	<u>Recommendation:</u> Allow School Nurses to be eligible for the Pupil Personnel Director License.	ESE did not include changes to the requirements for the Pupil Personnel Director license. These changes require another public comment period.
Professor	<u>Recommendation:</u> It is in the best interests of all students that those receiving pre-service training as Administrators of Special Education have broad exposure to opportunities beyond the local level practica/intemships as part of their training. Varied opportunities for our future leaders of special education will serve to enrich their understanding of their chosen profession and enhance their ability to communicate the "bigger picture" to key stakeholders representing diverse points of view and backgrounds.	As written, the standards and indicators for Administrative Leadership and the program approval standards adequately address these concerns. No change needed.

MTA	See MTA transmittal letter and <i>Tomorrow's Teachers</i>	See comments above and in X. (Section 7.04 (4)).
XIII. Section 7.14(2)(a) – New Field		
COMTEC	<u>Support:</u> The reinstatement of the 150 internship/practicum/practicum equivalent to add the ESL license.	We agree.
XIV. Section 7.14(13) – Hardship Waivers and Critical Shortage		
MTA	<u>Recommended Language:</u> The Commissioner may exempt a district for any one school year from the requirement to employ personnel licensed or certified personnel under in accordance with M. G. L. c. 71 § 38G. The Commissioner may deem a district to have a great hardship in securing licensed or certified personnel for the purposes of M. G. L. c. 71 § 38G upon request of a superintendent and demonstration to the Commissioner that the district has made a good-faith effort to hire licensed or certified personnel, and has been unable to find them a licensed or certified candidate who is qualified for the position. In the instances where there were licensed applicants who were otherwise unqualified for the position, the superintendent shall explain the details of the lacking qualification(s). Persons employed under waivers must demonstrate that they meet minimum requirements as established by the Department and are making continuous progress toward meeting the requirements for licensure or certification in the field in which they are employed. During the time that a waiver is in effect, service of an employee of a school district to whom the waiver applies shall not be counted as service in acquiring professional teacher status or other rights under M. G. L. c. 71, § 41.	See below.
Paul C. Nordberg	<p><u>Recommendations:</u> Add language that licensed applicants are deemed qualified and placing the burden on the district to demonstrate, with specificity, why it viewed the licensed applicants as unqualified.</p> <p>Add a provision stating that waivers for either hardship or critical shortage will only be issued upon a showing that either 1) there were no licensed applicants in response to an advertised position; or 2) every licensed applicant either declined the position, or is unqualified for the position.</p> <p>Add language clarifying that districts seeking a waiver to continue to employ an unlicensed person for subsequent school years, are required to make a good-faith effort for each such school year.</p> <p>Add language requiring ESE to post on its website, organized by school district, the following information regarding waivers: date applied for, position, date waiver issued, waiver expiration date, and number of school years an unlicensed employee has been employed under a waiver.</p>	<p>This level of detail is more appropriate for administrative procedures, protocols, and guidelines. The waiver process is the subject of on-going litigation and in fact, we're addressing the details in an administrative protocol that we've filed with the court.</p> <p>This information is already available to the public in accordance with the Public Records Law.</p>
XV. Other General Comments		
COMTEC	<p><u>Eliminate:</u> Preliminary license.</p> <p><u>Recommendation:</u> a candidate must hold the appropriate license at the Initial level or above to be identified as fully licensed.</p>	This is a statutory requirement. A change of this type must be made through the legislature. No change needed.

COMTEC	<p><u>Concern:</u> The implementation timeline for implementing the new administrator licensure regulations needs to be revisited, given organizations just received the guidelines and standards in late May.</p>	<p>We understand the issues with the timeline and the delay in the guidelines, but believe the current timeline as it stands from approved regulations in December 2011, is sufficient.</p>
SHC	<p><u>Recommendation:</u> Supervising Practitioners hosting a full semester practicum student (student teacher) should receive the same number of PDP’s as taking a 3 credit graduate class.</p> <p>Given the additional demands being placed on our P-12 schools and partners, particularly on the cooperating practitioners, it might be a good time to review the PDP hours associated with hosting a pre-service teacher. 12 PDP’s for a semester’s work (14 weeks, 5 days a week) does not give respect to the amount of time invested when the cooperating practitioners supervises and supports a pre-service teacher.</p>	<p>This comment is not specific to these regulations.</p>
CES	<p><u>Recommended Language:</u> 7.01(1)(g): Strengthen accountability for providers of preparation programs by linking state approval to the performance of their candidates on state licensing tests and performance assessments, as well as results of state-administered surveys and state-collected employment data and evaluation ratings data, which will be provided by the Approved Preparation Programs.</p> <p>This section should be further revised to make clear that other tasks that belong with the DESE will be undertaken by DESE. The DESE should collect employment data and evaluation ratings data concerning the various program graduates.</p>	<p>This is made clear in Section 7.03(5) and will be further clarified in guidelines.</p>
Professor	<p><u>Concern:</u></p> <ol style="list-style-type: none"> 1) I am concerned that the groups given a seat at the table in this discussion represent entities whose larger purpose is the attack on public education . I am concerned that this attack is motivated both by those who stand to profit from privatizing this essential public space and by those who have come to accept market driven ideologies as ‘naturalized.’ 2) I see public education as fundamental to democracy and education itself as broad and deep with the purpose to develop creative, critical, empathic, active community members and citizens of our democracy. 3) I understand teaching and learning grow from the context and quality of lived relationships within and beyond the classroom, and that these qualities are not reducible to data points, to scores on a rubric, or the demands of accountability systems that are in fact unaccountability systems. I see that the work of teaching, and growing into teaching as personal and community work and that the further the assessment of this work grows from the individuals and the context the less accountable it becomes. 4) I think outcomes is a silly overused word that people in one hundred years will snicker at along with the phrase ‘data driven’ because it pretends at knowledge we do not have and serves those who would undermine the most essential aspects of our work. 	<p>With the exception of the reference to the term “data-driven” which we are changing to “evidenced-based,” this comment is not specific to the regulations.</p>

	<p>5) I am disturbed by the levels of surveillance being promulgated by groups like the Data Quality Campaign and the ease with which people of good will accept these surveillance systems. Reading of history, attention to how discourses of power are enacted, and understanding of the silencing effects of surveillance mechanism tell us that we should be very concerned about the tracking recommended by the DQC.</p> <p>6) While I support time in the classroom as part of any good teacher education program, I am concerned with the larger national push to undermine teacher education, foundations courses, and critical multicultural education while increasingly portraying teaching as technical work. I am concerned that without the fruitful tensions of university engagement in education and time for teachers new and veteran to reflect deeply on their practice, the forces working to deskill teaching (many of whom you invited to the table) will grow stronger.</p> <p>7) Therefore, I urge rejection of item one and the moving of assessment back into local hands of the professionals—teacher educators and cooperating teachers—who know this work. I am cautious in my support of item 3 that it be accompanied by expectations for broad coursework and a longer, not shorter, apprenticeship within the university and school partners.</p>	
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