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

January 2014

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| **Contributor** | **Public Comment** | **Department Response and Recommendation** |
| Heather Johnson, College of the Holy Cross | ***Concerns and Questions:*** 1. **Section 7.03 (8) – Educator Preparation Program Approval - Implementation**

The implementation deadline will be July 1, 2016. That seems like a very reasonable timeline, although I wonder what that transition will look like… I wonder, then, if DESE envisions the timeline as one that is flexible, according to the readiness of a given program, or if this timeline is actually one that is needed on the development side.1. **Section 7.08 – Professional Standards for Teachers**

The indicators listed in 7.08 (3) seem to be presented as some form of non-negotiables. In other words, these MUST be included in the guidelines, regardless of how the rest of the guidelines unfold. Why these?..I am also left wondering about the larger implications of removing the indicators from the regulations. My immediate response is that it will be useful and more efficient when changes need to be made. However, are there dangers in setting this as a practice? What, then, are the steps of making changes? Who needs to approve them? Will this set us up for constant changes, leaving programs scrambling to keep up? I am simply posing these questions to be sure they are being asked, not because I want rigid indicators outlined in the regulations.1. **Section 7.14 (1) (a) – SEI Endorsement**

It is my understanding that, as of July 1, 2014, educator prep programs cannot endorse a candidate in a core academic subject without an SEI Endorsement. Therefore, is it accurate to say that options (2) through (4) are not available to students in traditional prep programs? Are programs able to waive the course if a student satisfies the requirement through one of the other options? If not, that is not clear from the way it is written, which suggests that they have multiple options.1. **Section 7.15 (14) (f) – Implementation**

As mentioned above, my biggest concerns are related to the implementation timeline. Is the extended timeline intended to give programs time to make thoughtful, informed changes? Or is it building in time for the Department to develop the details of the new regulations, which will then be put onto the programs on a tight timeline? | 1. The timeline is flexible and programs can transition and implement prior to the July 1, 2016 deadline.
2. The indicators in 7.08(3) must be included in the guidelines since these requirements are part of the RETELL initiative adopted by the Board in June 2012. We believe that having the other indicators in Guidelines provides flexibility in making changes in the future, and we will not impose unrealistic timelines expectations for programs to make the changes.
3. The options for earning the SEI endorsement as outlined in 7.14 (1) (a) 1-4 are available to anyone.
4. The implementation timeline is intended to give programs the opportunity to make the necessary changes to the programs. The timeline for issuing the indicators in Guidelines based on work and collaboration with the field is as follows: draft by June 2014 available for public comment, public comment in July/August, and finalized Guidelines by September 2014.
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| Massachusetts Association of Colleges for Teacher Education (MACTE) | ***Support:*** * MACTE is in support of the elimination of the “Standards for Library Teachers”.
* MACTE is in support of the change that moves the “detailed indicators” for use with the Professional Standards for Teachers to “published guidelines”. We offer MACTE support as ESE moves to delineate these detailed indicators.
* MACTE commends the work of the board in moving to use of the same language in communicating Professional Standards for Teachers from pre-service through in-service levels.
 | We agree. |
| James Cressy, Framingham State University | ***Concern:*** **Section 7.08 – Professional Standards for Teachers**I am in favor of aligning the standards for preservice teachers with those of inservice teachers as proposed here. My comments about this change will be made in reference to the model rubric for classroom teacher evaluation created by DESE and found here: <http://www.doe.mass.edu/edeval/model/PartIII_AppxC.pdf> I was pleased to see students with disabilities referenced explicitly in three different areas of the rubric. However, I am concerned about the lack of explicit reference in the rubric to Individualized Education Programs (IEPs), 504 plans, accommodations, modifications, related services, and other aspects of special education. In section II-A-3 (Meeting Diverse Needs), the Proficient rubric descriptor states that the teacher will use “tiered interventions and scaffolds” but there is no requirement that the teacher follows the IEP or 504 plan for students with disabilities, providing the student with legally required accommodations and other supports. Later, in II-D-3, the rubric states that the teacher “adapts instruction, materials, and assessments” but again, there is no explicit reference to the teacher’s legal requirements under special education law to do this in a certain way.In the current PPA standards, there is one (A8) that explicitly requires preservice teachers to demonstrate proficiency with implementing IEPs. If this requirement is removed, I think there could be a negative impact on students with disabilities and their families in the future. It is important that all teachers entering the field have experience and proficiency in using IEPs and 504 plans.In other areas of the rubric, I see important changes that will improve what we can focus on at the preservice level with respect to classroom and behavior management, classroom climate, and diversity and inclusion. My suggestion in this area would be to emphasize the need for teachers to attend to students’ social-emotional learning (SEL) and mental health needs. A quick word count of the rubric reveals that the word “behavior” is used many times in the guidelines, but the words “social,” “emotional,” “mental,” and “health” are never used. It is important that teachers are prepared to work with the whole child. Social, emotional, and behavioral supports can only be effectively provided when the teacher is prepared to address these issues across all age levels. I would recommend that preservice teachers have a requirement to demonstrate proficiency with social-emotional and behavioral supports, and recognizing the warning signs of mental health problems in children. I was pleased to see that IV-E-1 includes an important change that requires teachers to focus on the school-wide behavior and learning expectations. This will help preservice teachers to work in schools that are implementing school-wide positive behavioral interventions and supports (PBIS). This area of the guidelines could be an appropriate place to add language and emphasis on social-emotional learning (SEL) and mental health needs. Students with internalizing problems such as anxiety, depression, eating disorders, etc. are more likely to fall through the cracks and not receive interventions, if the teachers are only looking for externalized behavior problems.  | As proposed, the standards for preparation and licensure as outlined in 7.08 are the same standards outlined in the evaluation regulations in 35.03. The Department will take these comments into consideration when we draft the indicators to be included in the Guidelines.  |
| Massachusetts Teachers Association (MTA) | ***Concern:***1. Eliminating all past-due date-specific requirements outlined in 7.03, Educator Preparation Program, (8) Implementation.
2. Focusing on the performance assessment for Initial License in Professional Standards for Teachers in 7.08 (1). As written, the proposed changes would mandate a performance assessment as an additional requirement for all licenses – Preliminary, Initial and Professional – rather than the Initial license alone. The term “Performance Assessment” appears in the definitions in 7.02 for both Initial License and Professional Licenses. The MTA is assuming that the mandatory performance assessment cited here applies only to the Initial license. We understand that there is an optional performance assessment for the Professional license.
3. As written, the proposed amendments appear to apply only to candidates seeking Initial Licensure via a program, such as one offered by an institution of higher education. The MTA proposed revision clarifies that the requirement to use the Standards and Indicators applies to all routes – either program or assessments only such as PRPIL – for Initial Licensure.
4. Aligning the Professional Standards and Indicators in Professional Standards for Teachers in 7.08 (2).with those in 603 CMR 35.03
5. Clarifying that the proposed additional indicators in Professional Standards for Teachers 7.08 (3) refer to Sheltered English Immersion endorsement requirements.
 | 1. We agree. We have revised 7.03 (8) to remove all past implementation dates.
2. We have revised 7.08 (1) to clarify this.
3. The intention is to require the Standards and Indicators for all routes to initial teacher licensure, except for the out of state route (7.05 (5)). We have inserted additional references in 7.05 (4) and will also update the Pre-Service Performance Assessment Guidelines for Teachers: <http://www.doe.mass.edu/edprep/resources/guidelines-advisories/> to include Route 4 (7.05 (4)).
4. The standards are aligned to 35.03 and for consistency with 7.09 (Professional Standards for Administrative Leadership), we are leaving this section as is.
5. The requirements set forth in 7.08 (3) were adopted by the Board in June 2012 as part of the RETELL initiative. These requirements apply to all teachers and thus are not limited to the SEI endorsement.
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