

## PUBLIC COMMENT REPORT

### PROPOSED REVISIONS TO CREATE A NEW AUTISM ENDORSEMENT:

#### To be added to section 7.14: Endorsements: (5) Autism Endorsement

### Executive Summary

The Department received 32 comments during the public comment period. Comments were received from four teachers, four higher education representatives (five comments), two principals, two individuals whose role was unidentified, two individuals serving in an Applied Behavior Analyst (ABA), Board Certified Behavior Analyst (BCBA) or behavioral specialist role, two parents, two special education administrators, two advocacy organizations (three comments), one individual working for an autism nonprofit organization, one representative of a school for children with autism, one non-teacher autism specialist, one superintendent, one teachers union, and one educational collaborative (five comments). The Board also received additional public comments from three previous commenters at the June 23, 2015 Board Meeting: Massachusetts Advocates for Children, the Massachusetts Teachers Association, and Elizabeth Stringer Keefe of Lesley University. All comments are now reflected in this report.

As a result of these public comments, we propose the changes outlined below.

Note: Superscript numbers indicate the corresponding public comment document received on which our responses are based. Attached to this report is a list of individuals who submitted public comment and their affiliations.

### General Comments

**Comments:** The Department received one request to waive the Sheltered English Immersion (SEI) Endorsement for teachers who are required to have an Autism Endorsement<sup>12</sup>. There was a question as to whether or not this disability focused endorsement will lead to the creation of endorsements for each disability category, and whether or not districts would be required to hire someone with this endorsement to fulfill IEP requirements<sup>9</sup>. Two comments address concerns about funding for the specialized training for educators necessary to qualify for the endorsement<sup>27,28</sup>.

**Response:** No changes to the proposed regulations. The Autism Endorsement is intended as a value-added recognition for teachers and will not be required. Other disability endorsements may be developed over time but there is no specific plan to do so at this time. It would not be appropriate for the Department to waive other licensure requirements unrelated to the Autism Endorsement, e.g. the required training for the SEI endorsement.

	<b>603 CMR 7.04</b>	<b>Comments</b>
	.... (5) Endorsements Issued	<b>Comment:</b> No comments received.

	<p><del>(a) Sheltered English Immersion Teacher</del></p> <p><del>(b) Sheltered English Immersion Administrator</del></p> <p><del>(c) Transitional Bilingual Learning</del></p> <p>....</p>	<p><b>Response:</b> This is a technical change. This language is being removed as it is unnecessary; it appears elsewhere.</p>
	<b>603 CMR 7.14</b>	<b>Comments</b>
	<p><u>Except as provided in 603 CMR 7.15(9)(b), 603 CMR 7.00 does not require an educator to seek or obtain an endorsement; provided that nothing in 603 CMR 7.00 shall limit the authority of a school committee under G.L. c. 71, s. 38G to prescribe qualifications for employment in addition to licensure.</u></p>	<p><b>Comment:</b> We received several inquiries about whether or not the Autism Endorsement would be mandatory for all educators<sup>3,4,9,12, 27</sup> and concerns that without explicit language in the regulations that the endorsement is not a required credential, there may be misconceptions in the field about whether students with autism may be taught by educators who do not have the endorsement<sup>27,28</sup>. There was support for the endorsement if it is deemed to be an optional endorsement<sup>4,10,28</sup> and a proposal to create a new subsection stating that the endorsement is voluntary<sup>34</sup></p> <p><b>Response:</b> We have revised the regulation to clarify that all endorsements are voluntary except as provided in 603 CMR 7.15(9)(b), the requirement for the Sheltered English Immersion Endorsement.</p>
	<b>603 CMR 7.14(5)</b>	<b>Comments</b>
<b>(5)</b>	<p><b>Autism Specialist Endorsement.</b>  <u>Awarded to educators who meet the following requirements:</u></p>	

<p><b>(a)</b></p>	<p>Prerequisite license:</p> <p>1. An Initial or Professional license as a Teacher of Students with Moderate Disabilities, Teacher of Students with Severe Disabilities, <del>Early Childhood</del>, Teacher of the Deaf and Hard-of-Hearing, or Teacher of the Visually Impaired; <del>or</del></p> <p>2. <del>An Initial or Professional license as an Elementary Teacher or a core academic subject license.</del></p>	<p><b><u>Comment:</u></b> Recommendation to require a minimum of two years experience under the prerequisite license<sup>7,17,30,31,33</sup>.</p> <p><b><u>Response:</u></b> No change to proposed regulations. We do not believe that teaching experience is a pre-requisite to finding value in this “knowledge-based” endorsement. Every candidate for the endorsement will have completed training and field experience since eligibility for the endorsement is limited to licensed teachers.</p> <p><b><u>Comment:</u></b> Request that there be a distinction in title between general and special educators who receive the endorsement to reflect differences in special education knowledge<sup>7,17,30,31</sup>.</p> <p><b><u>Response:</u></b> The proposed regulation has been revised to clarify that in this initial phase, the endorsement is available only to licensed special education teachers who meet the requirements.</p> <p><b><u>Comment:</u></b> Comments in opposition to making the endorsement available to general educators and educators with the early childhood license<sup>6,21,22,24,26,28,29,32,35</sup>.</p> <p><b><u>Response:</u></b> The proposed regulation has been clarified by eliminating the reference to “Specialist” and using the term Autism Endorsement. In addition, it has been revised to clarify that in this initial phase, the endorsement is available only to licensed special education teachers who meet the requirements.</p> <p><b><u>Comment:</u></b> Recommendation to require general education teachers complete advanced coursework in the foundations of special education prior to starting an autism endorsement</p>
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		<p>program<sup>33</sup>.</p> <p><b>Response:</b> The proposed regulation has been revised to clarify that in this initial phase, the endorsement is available only to licensed special education teachers who meet the requirements.</p> <p><b>Comments:</b> Recommendation to allow licensed Behavior Analysts and individuals meeting the requirements of licensure as a Behavior Analyst, as outlined by the Board of Allied Mental Health and Human Services Professions, to be eligible to receive the endorsement<sup>13,14,15,16,18,19,20,25</sup>.</p> <p>Recommendation to allow school psychologists and speech/language pathologists to be eligible for the endorsement<sup>27</sup>.</p> <p><b>Response:</b> No changes to the proposed regulations. The law does not authorize making this endorsement available to anyone other than licensed teachers.</p>
(b)	<p>Demonstration of the subject matter knowledge and skill requirements set forth in 603 CMR 7.14 (5) (d), <u>through one of the following:</u></p> <p><u>1. Demonstration of the subject matter knowledge and skill requirements set forth in 603 CMR 7.14 (5) (d) through the successful completion of a Department-approved course of study specific to providing services to students with autism. The Department will issue guidelines to govern program approval for this course of study.</u></p> <p><u>2. Passing a Department-approved Assessment</u></p>	<p><b>Comment:</b> Extensive questions and comments regarding the development of the Department-approved course of study<sup>27</sup>.</p> <p><b>Response:</b> No changes to the proposed regulations.</p> <p><b>Comment:</b> Recommendation to add alternate approval through a panel review process as a way to demonstrate the subject matter knowledge and skill requirements for the endorsement<sup>28</sup>.</p> <p><b>Response:</b> The revised regulation anticipates two alternative pathways: one for teachers who hold a comparable autism endorsement or license from another state and one that allows the option of passing a Department-approved assessment as a pathway to this endorsement.</p>

<p>(c)</p>	<p>Field Experience Required:</p> <p><u>1.</u> Completion of a 150 hour field-based experience that includes a minimum of 75 hours in an inclusive setting with students with autism and 75 hours of additional experience <u>in any type of school setting</u> working with students with autism.</p>	<p><b><u>Comment:</u></b> Recommendation that the field experience requirement be increased to 300 hours, and that in addition to the time in an inclusive setting (which the commenter strongly supports), teachers also be asked to observe in a substantially separate setting <sup>2</sup>.</p> <p><b><u>Response:</u></b> A requirement of 300 hours of field-based experience is inconsistent with the requirements of other endorsements and is unnecessary because this endorsement is not a stand-alone teaching license. In response to the recommended inclusion of the requirement to observe in a substantially separate setting, we have added language (underlined) clarifying that the entire 150 hours of field-based experience must be in a school setting, thus clearly allowing experience in a substantially separate or separate school setting.</p> <p><b><u>Comment:</u></b> Recommendation that teachers with experience working with at least one student with autism replace language referencing “working with students with autism”<sup>27</sup>.</p> <p><b><u>Response:</u></b> No changes to the proposed regulations. Autism is a “spectrum disorder” such that students with this disability present with a wide range of strengths and challenges. We believe it is important that teachers have experience working with the unique and complex educational needs of more than one student with autism.</p> <p><b><u>Comment:</u></b> Recommendation to amend the language to align with the field experience component of the Transition Endorsement, i.e., “supporting students with autism in an inclusive setting, developing IEPs for student with autism and working with families, community</p>
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	<p><u>2.</u> Teachers meeting the prerequisite license requirements outlined in 603 CMR 7.14 (5) (a)(1) who can demonstrate at least one year of teaching experience working with students with autism <del>are exempt from the field-based experience requirement</del> shall <u>complete at least 75 hours of field-based experience working with students with autism in any type of school setting, including at least 50 of which take place in an inclusive setting in lieu of meeting the field experience requirement of 603 CMR 7.14(5)(c)(1).</u></p>	<p>members and other relevant professionals”<sup>28</sup>.</p> <p><b>Response:</b> No changes to the proposed regulations. These skills are included in (d)(5) of the proposed regulations defining subject matter knowledge.</p> <p><b>Comment:</b> Recommendation to revise the prerequisite field experience requirement from at least one year of teaching experience to 150 hours of professional experience and related employment<sup>28</sup> and a recommendation that field experience include non-school based settings, such as in the community, in a hospital, or in domestic settings<sup>21</sup>.</p> <p><b>Response:</b> No changes to the proposed regulations. This Autism Endorsement is complementary to a teaching license and not meant to cover all other settings. While experience in other settings is valuable, it is not the intent of the endorsement. We believe it is important that teachers have experience working with the unique and complex <u>educational</u> needs of several students with autism.</p> <p><b>Comment:</b> Objections to the ability to waive the field-based experience <sup>6,7,17,21,22,24,26,29,30,31,32,33, 35</sup>. One request for clarification as to whether or not time spent as a paraprofessional or ABA technician working with students with autism can be used to demonstrate the one year of teaching experience<sup>5</sup>.</p> <p><b>Response:</b> We propose eliminating the waiver and instead requiring half the number of hours for candidates meeting the prerequisite license requirements who can demonstrate at least one year of experience teaching students with autism. Experience as a paraprofessional or ABA provider does not meet the “teaching” experience</p>
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		requirement.
(d)	<p>Subject Matter Knowledge:</p> <ol style="list-style-type: none"> <li>1. Understanding of autism including the co-morbid conditions associated with autism spectrum disorders and the differences between a medical diagnosis of autism and the definition of the term autism under state and federal special education laws. Knowledge of the unique characteristics of autism as related to communication, social/emotional development, behavior, sensory processing, cognition, and learning.</li> </ol>	<p><b><u>Comment:</u></b> Recommendation to add subject matter knowledge (SMK) that addresses the need to support talents of individual students, including identification, recognition, and nurturing of one or more talents<sup>8</sup>. Additional specific recommendations on the development of guidelines to meet the subject matter requirements outlined in the regulations<sup>28</sup>.</p> <p><b><u>Response:</u></b> No changes to the proposed regulations. These comments will be considered as we create the accompanying guidelines.</p>
	<ol style="list-style-type: none"> <li>2. Assessment of students with autism including: an ability to identify, administer, and interpret a range of formal and informal tools in a culturally and linguistically appropriate manner that assess the unique strengths, skills (including academic, social, behavioral and adaptive) and learning styles of students with autism ages 3-22.</li> <li>3. Knowledge of how ongoing assessment and data collection can be used to inform instruction, services and supports; monitor progress and rates and patterns of skill acquisition; and ensure the maintenance and generalization of skills across settings.</li> <li>4. Design of effective educational programs and individual supports based on</li> </ol>	<p><b><u>No comments received.</u></b></p>

	<p>peer reviewed research to the extent practicable to support students with autism in the least restrictive environment. Knowledge of the range of specialized and individualized instructional strategies and supports for students with autism, including assistive technology, to address: the verbal and nonverbal communication needs; the need to develop social interaction skills and proficiencies including the skills and proficiencies needed to avoid and respond to bullying, harassment or teasing; the needs resulting from the student's unusual responses to sensory experiences; the needs resulting from resistance to environmental change or change in daily routines; the needs resulting from engagement in repetitive activities and stereotyped movements; the need for positive behavioral interventions, strategies, and supports to address any behavioral difficulties; and other needs resulting from the student's disability that impact making progress in the general curriculum, including social and emotional skills.</p> <p>5. Understanding and supporting the roles of other disciplines and professionals involved in the education of students with autism and facilitating coordination and</p>	
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	<p>collaboration of relevant IEP Team members, including parents or caregivers, related service providers and medical professionals, to meet the unique needs of students with autism in a culturally sensitive manner in accordance with M.G.L. c. 71B, §3, ¶6.</p>	
<p>(e)</p>	<p>Candidates with at least three years of previous employment primarily serving students with autism who can demonstrate that they meet the subject matter knowledge and skills requirements set forth in 603 CMR 7.14(5) (d) and possess a prerequisite license as outlined in 603 CMR 7.14 (5) (a) (<del>4</del>) will be exempt from the requirements set forth in 603 CMR 7.14(5) (b) and (c) if they apply <u>and complete all requirements</u> for the endorsement no later than December 31, 2016.</p>	<p><b>Comments:</b> Recommendation that individuals with at least 10 years of experience working as an Autism Specialist be allowed to waive the prerequisite license requirements<sup>1,11</sup>.</p> <p><b>Response:</b> No changes to the proposed regulations. The law does not authorize making this endorsement available to anyone other than licensed teachers.</p> <p><b>Comment:</b> Recommendation that teachers with experience working with at least one student with autism replace language referencing “employment primarily serving students with autism”,<sup>27</sup> Comment that working “primarily” with students with autism spectrum disorder is too restrictive<sup>27</sup>.</p> <p><b>Response:</b> No changes to the proposed regulations. We believe that it is important that teachers have experience working with the unique and complex educational needs of more than one student with autism.</p> <p><b>Comment:</b> Recommendation to remove the three years of prior experience requirement and allow teachers previously employed in a position primarily serving students with autism to be eligible<sup>28</sup></p> <p><b>Response:</b> No changes to the proposed regulations. The intent of section (e) is</p>

		<p>to provide an Autism Endorsement immediately only to educators who not only have taught students with autism for an extended period of time but can also demonstrate up-to-date subject matter knowledge and skills.</p> <p><b>Comment:</b> Recommendation to add alternate approval through a panel review process as a way to demonstrate the subject matter knowledge and skill requirements for the endorsement<sup>28, 34</sup>.</p> <p><b>Response:</b> The revised regulation anticipates two alternative pathways: one for teachers who hold a comparable autism endorsement or license from another state and one that allows the option of passing a Department-approved assessment as a pathway to this endorsement.</p>
<p><b>(f)</b></p>	<p><u>Candidates who were prepared outside of Massachusetts and possess a prerequisite license as outlined in 603 CMR 7.14 (5)(a) shall not be required to complete requirements of 603 CMR 7.14(5)(b-d) if such candidate can provide documentation of one of the following:</u></p> <p><u>(1)Completion of a comparable educator preparation program that is either state- approved under the NASDTEC Interstate Agreement or has been accredited by an organization accepted by the Commissioner, such as the National Council for Accreditation of Teacher Education (NCATE).</u></p> <p><u>(2)Possession of a comparable out of state license/certificate/endorsement</u></p>	<p><b>Comment:</b> Recommendation to add alternate approval through a panel review process as a way to demonstrate the subject matter knowledge and skill requirements for the endorsement<sup>28</sup>.</p> <p><b>Response:</b> The revised regulation anticipates two alternative pathways: one for teachers who hold a comparable autism endorsement or license from another state and one that allows the option of passing a Department-approved assessment as a pathway to this endorsement.</p>

	<p>issued by a state with which <u>Massachusetts has signed the NASDTEC Interstate Agreement or other agreement accepted by the Commissioner.</u></p>	
<p><b>(f)(g)</b></p>	<p>The requirements for the Autism Specialist Endorsement may also be used to satisfy course requirements necessary to obtain a Professional license listed in 603 CMR 7.04(2)(c).</p>	<p><b>Comments:</b> Request to add additional language stating the elements of the required coursework that meet professional license standards in the guidelines to be issued by the Department<sup>28, 34</sup>.</p> <p><b>Response:</b> No changes to proposed regulations. The regulatory language recapitulates statutory language. The Department will include in guidelines the process for obtaining a Professional license using the autism endorsement.</p>
<p><b>(g)(h)</b></p>	<p>Renewal. The Autism Specialist Endorsement shall be valid for five years and may be renewed for successive five-year terms to individuals who meet the following requirements:</p> <ol style="list-style-type: none"> <li>1. Valid license as listed in 603 CMR 7.14(5) (a), and</li> <li>2. Successful completion of 30 professional development points (PDPs) in the content area related to 603 CMR 7.14 (5) (d). The 30 PDPs may be included in the total number of PDPs necessary for license renewal pursuant to 603 CMR 44.00: <i>Educator License Renewal</i>.</li> </ol>	<p><b>Comments:</b> Recommendation that the Autism Endorsement be renewed automatically on the same cycle as an educator’s professional license, and that the requirement for PDPs for the endorsement be lowered to 15<sup>28,34</sup>.</p> <p><b>Response:</b> No changes to the proposed regulations. Autism is a complex disability that impacts developmental, social, language, sensory and cognitive domains. There is ongoing research in education, communication, psychology and medicine related to the identification of evidenced-based practices for the education of students with autism and their families. 15 hours of PDPs is not sufficient to update knowledge and skills. The Department will work with Information Technology to see if it is possible to change ELAR programming to allow educators to select the date on which their license will renew, which would permit educators to align renewal dates.</p>

Individuals and Organizations that Submitted Public Comments on  
the Proposed Amendments to 603 CMR 7.00 Regulations for  
Educator Licensure and Preparation Program Approval:  
Adding an Endorsement for Serving Students on the Autism  
Spectrum

<b>Comment Number</b>	<b>Name</b>	<b>Affiliation</b>	<b>Role</b>
1	Sean O'Neil	Gateway Regional School District	Autism Specialist
2	Jill Graham	Crest Collaborative	Principal
3	Kristopher Langan	Hudson High School	Teacher
4	Kenneth High	Hudson High School	Teacher
5	Catherine Zinni	Hayden McFadden Elementary School	Principal
6	Elizabeth Stringer Keefe	Lesley University	Faculty
7	Tina Fitanides	Massachusetts Advocates for Children	Policy Analyst
8	Carol Lach	Framingham Elementary School	Unknown
9	Jeff Ferranti	Athol-Royalston Regional School District	Director of Special Education
10	Beverly Schwartz	Parent	Parent
11	Michele Crane	Parent	Parent
12	Rebecca Craig	Dennis-Yarmouth	Teacher
13	Laura Stanley	ACCEPT Collaborative	ABA Specialist
14	Rebecca Razumny	ACCEPT Collaborative	ABA Specialist
15	Robin Richards	ACCEPT Collaborative	ABA Specialist
16	Robyn Therrien	ACCEPT Collaborative	Unknown
17 & 33	Tina Fitanides	Massachusetts Advocates for Children	Policy Analyst
18	Kerrie M. Otipoby	Holliston Public Schools	Behavior Inclusion Specialist Coordinator

<b>Comment Number</b>	<b>Name</b>	<b>Affiliation</b>	<b>Role</b>
19	Sara Sniderman	Unknown	Unknown
20	Anne Donovan	ACCEPT Collaborative	Behavior & Educational Consultant
21 & 35	Elizabeth Stringer Keefe	Lesley University	Faculty
22	Christina Chandler	Lesley University	Assistant Director, Academic Advising & Student Services
23	Everett V. Olsen, Jr.	Westford Public Schools	Superintendent
24	Teresa Carpenter	Easton Public Schools	Teacher
25	Julia L. Fredette	Millis Public Schools	BCBA
26	Renée Greenfield	University of Hartford	Assistant Professor of Special Education
27	Sharon D. Stewart	Tri-Town School Union	Assistant Superintendent of Student Support Services
28 & 34	Massachusetts Teachers Association	Massachusetts Teachers Association	Association
29	Erika Drezner	Asperger/Autism Network	Coordinator of Child and Teen Services
30	Jessica Everett	Melmark New England	Senior Educational Behavioral Consultant
31	Nancy Murray	Fitchburg State University	Associate Professor
32	Marie Duggan	Technology For Autism Now, Inc	Founder/President