***Massachusetts Department of***

***Elementary and Secondary Education***

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| Jeffrey C. Riley*Commissioner* |  |

# MEMORANDUM

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| **To:** | Members of the Board of Elementary and Secondary Education |
| **From:**  | Jeffrey C. Riley, Commissioner |
| **Date:**  | December 6, 2019 |
| **Subject:** | Proposed Amendment: Educator Licensure and Preparation Program Approval Regulations, 603 CMR 7.00 – Alternative Assessment Pilot |

I am presenting to the Board of Elementary and Secondary Education (Board) this month a proposed amendment to 603 CMR 7.00, the Regulations for Educator Licensure and Preparation Program Approval, for a vote to solicit public comment. The proposed amendment would create opportunities to pilot and learn from alternative assessments for licensure that will promote equitable access for qualified educators to earn an educator license.

**Context**

As part of the state’s Education Reform Act of 1993, all new teachers were required to pass two tests to become certified to teach in Massachusetts public schools: knowledge of subject content, and communication/literacy skills. To meet this new assessment requirement, the Massachusetts Tests for Educator Licensure (MTEL) were developed and administered for the first time in 1998 as one requirement to earn a Massachusetts educator license. The Department of Elementary and Secondary Education (Department) currently contracts with Evaluation Systems of Pearson to administer the over [thirty-five MTELs](http://www.doe.mass.edu/mtel/testrequire.html).

All educator candidates must take and pass the Communications and Literacy Skills MTEL and teacher candidates are also required to take a subject matter MTEL in the content area of their license. This requirement is set forth in M.[G.L. chapter 71, section 38G](https://malegislature.gov/laws/generallaws/parti/titlexii/chapter71/section38g), which states that candidates for licensure must “*pass a test established by the board which shall consist of two parts: (A) a writing section which shall demonstrate the communication and literacy skills necessary for effective instruction and improved communication between school and parents; and (B) the subject matter knowledge for the certificate.”*

The proposed regulatory amendment would create flexibility in piloting alternative assessments to the MTEL for educator licensure.

**Proposed Amendment**

This amendment is designed to:

* Identify, pilot and learn more about alternative ways to assess new educators’ knowledge and skills
* Be responsive to feedback from the field, and
* Maintain a high standard for assessing educators’ knowledge and skills.

The proposed new regulation states:

**603 CMR 7.04 (2) (e)** **Alternative Assessment Pilot**

The Department may conduct a pilot of alternative assessments identified or developed to satisfy the requirements of 603 CMR 7.04 (2) (a) (2) and (3) and 603 CMR 7.04 (2) (b) (2) and (3). Any alternative assessment identified or developed for this purpose shall be determined by the Commissioner to be comparable to the MTEL Communication and Literacy Skills test or subject matter knowledge test. The alternative assessment pilot period shall continue through June 30, 2023. Any candidate who passes an alternative assessment during that period will be deemed to have satisfied the requirements of 603 CMR 7.04 (2) (a) (2) or (a) (3), or 603 CMR 7.04 (2) (b) (2) or (b) (3), as applicable. During the period of the alternative assessment pilot, the Commissioner will report to the Board at least annually on any alternative assessments, including the number of candidates taking the alternative assessments, any evaluative information regarding these candidates, patterns of employment, and feedback from school districts and educator preparation programs. Prior to making any recommendations following the conclusion of the pilot, the Commissioner shall conduct or contract for an evaluation of the alternative assessment pilot.

**Background on Proposed Amendment**

In “Our Way Forward,” I noted that we are examining our licensure practices and other strategies to promote entry into the profession for underrepresented groups, based on compelling data and research:

* 40 percent of students in Massachusetts public schools are students of color, while only 8 percent of our teachers are of color.
* A growing body of research shows improved high school completion and life outcomes if students of color have even one teacher who looks like them in their elementary school experience.[[1]](#footnote-1)

Research shows that diversifying the teaching population can have positive effects on teachers’ expectations of students of color and their academic success and persistence.[[2]](#footnote-2) Educational attainment and opportunity gaps between sociodemographic groups are well-documented, entrenched, and associated with negative education, employment, health, and other social outcomes.[[3]](#footnote-3) Schools with larger numbers of black teachers or a black principal have greater representation of black students in gifted programs relative to the school’s general student body. A similar relationship was found for Latinx teachers and representation of Latinx students.[[4]](#footnote-4)

During my listening and learning tour over the last year, I often heard from the field about individuals who are or could be great teachers but have been unable to pass the MTEL. As is true for most educator license tests in other states, overall pass rates on MTEL vary based on race and ethnicity, causing concern that MTEL requirements may discourage qualified educators of color from entering the profession. At the same time, we have an ongoing commitment to ensure that teachers know the content they are being asked to teach and have the deep knowledge they need to foster deeper learning for our students.

The MTEL is a strong tool to assess subject matter knowledge and we will continue using it as the main assessment to measure licensure candidates’ content knowledge. This is supported by analysis that shows an individual’s performance on the MTEL is predictive of performance in the classroom and their students’ achievement. The proposal I am presenting would maintain this effective tool while expanding the opportunity to explore comparably effective alternative assessments, allowing educators another way to demonstrate their subject matter competency while continuing to uphold our high expectations. In this proposed amendment, we are seeking to identify and study comparable assessment alternatives to the MTEL to support these efforts.

**Pilot of Alternative Assessments for Educators**

The Department has identified three potential assessment alternatives (see enclosure) we may consider as part of this educator assessment pilot. These pilot alternatives to the MTEL uphold our expectation that all educators have the depth and breadth of content knowledge needed to support students in mastering standards, and provide flexibility in structure and format so candidates can demonstrate this content knowledge.

With the Board’s approval at the December 17 meeting, the Department will solicit public comment on the proposed regulation. During the public comment period, we will solicit feedback on the pilot alternatives and invite additional ideas from the field. We plan to bring the regulation back to the Board for final action at the March 24, 2020 meeting. At that meeting, I will also present further information on the alternative assessments that would be considered during the pilot period (through June 30, 2023).

Senior Associate Commissioner Heather Peske and Meagan Comb, Director for Educator Effectiveness, will join us at the December 17 meeting to discuss the proposed amendment and respond to your questions.

**Enclosures:** [Draft pilot alternatives](#Attachment1)

[Draft Regulations for Educator Licensure and Preparation Program Approval, 603 CMR 7.00 – new language underlined](#Attachment2)

Motion to solicit public comment

**Attachment 1 – Draft Alternative Assessments for Pilot Consideration**

Subject-Matter Assessment Alternatives: *The two options below would be considered as alternatives to the* ***subject-specific MTELs*** *and are designed to target two specific groups of teacher candidates in the workforce pipeline: 1) those currently employed on a waiver and 2) those currently enrolled in a high-performing preparation program.*

1. **Expansion of the Performance Review Program for Initial Licensure (PRPIL) Route**:
* **Proposal**: Allow individuals teaching on a waiver for multiple years who are unable to demonstrate their subject-matter knowledge by passing the MTEL(s) to demonstrate subject matter knowledge competency instead through the [PRPIL route](http://www.doe.mass.edu/edprep/prpil.html) (Performance Review Program for Initial Licensure). This expansion would entail soliciting vendors who would assess subject matter knowledge based on criteria established by the Department and comparable to the high bar set for content expectations through MTEL.
* **Current Policy:**
	+ Right now, PRPIL is open to any educator who has taught for three years on a provisional license (which is generally obtained by passing the MTELs and possession of a bachelor’s degree). An external vendor assesses the educator’s performance focused on pedagogical knowledge and skills. Importantly, this route does not provide direct support or training, but rather is an evaluation of current practice.
	+ Earlier in 2019, the Department updated our license waiver policy to allow districts additional flexibility to keep effective teachers on a waiver if they have not yet been able to obtain licensure. Prior to this, teachers on a waiver were usually limited in the number of years they could remain on that waiver. Through this new flexibility, some teachers on waivers are continuing to deepen their content knowledge to prepare to pass the MTEL while districts are continuing to evaluate their performance with evidence of their impact on students.
* **Rationale/Additional Considerations:**
	+ By putting out a Request for Responses (RFR) and soliciting vendors who are interested and can support the assessment of teacher’s subject matter knowledge, we encourage innovative thinking around assessment of teacher content-knowledge. The Department may consider existing products as well as new approaches. The RFR selection process will ensure comparability to the MTEL subject-matter expectations for teachers.
1. **Endorsement by Approved Educator Preparation Program Providers**:
* **Proposal**: In cases where candidates are unable to pass the MTEL subject matter tests, allow approved preparation providers that are in good standing (this would include Approved with Distinction and Approved as outlined in the [Guidelines for Program Approval](http://www.doe.mass.edu/edprep/ProgramApproval.docx)[[5]](#footnote-5), with demonstrated success in supporting candidate readiness) to attest to candidates’ subject-matter knowledge. Providers would be responsible for comprehensively assessing and attesting to a candidate’s subject-matter knowledge and would be required to complete and submit documentation to the Department. The Department would annually monitor and hold providers accountable for quality assurance of this subject-matter specific endorsement. Details of this option would be outlined in guidelines issued by the Department.
* **Current Policy:** This is a new idea. Preparation providers do not currently have this authority.
* **Rationale/Additional Considerations**: Some context about preparation provider operation in Massachusetts is necessary when evaluating this potential pilot alternative:
	+ Accountability for providers has increased significantly in the last five years. Consistent with the Board’s regulations, the Department evaluates and approves providers based on the outcomes they have produced. This has resulted in more differentiated ratings across providers and closure for those who are unable to meet the state’s standards.
	+ In 2018, the Department released the [Subject-Matter Knowledge Guidelines](http://www.doe.mass.edu/edprep/resources/smk-guidelines.pdf) that articulate a progression of content knowledge fluency for licensure and preparation. These guidelines necessitate support and assessment of subject-specific pedagogy in preparation programs.
	+ Preparation providers have also implemented additional subject-specific performance-based assessments and tasks. First, providers are in the midst of installing at least two subject-specific gateway tasks during the pre-practicum stage before a candidate enters into student teaching. Second, throughout the state, candidates are being assessed using the [Candidate Assessment of Performance](http://www.doe.mass.edu/edprep/cap/) as a final measure of readiness. [Recently released research](https://caldercenter.org/publications/clinical-experience-classroom-assessing-predictive-validity-massachusetts-candidate) finds that candidate performance on this Massachusetts-specific assessment is predictive of on-the-job performance.
	+ State policy does not require candidates to pass the MTEL prior to or during any aspect of participating in a preparation program. However, preparation providers have imposed this requirement as a way to ensure that candidates who complete their program are able to get licensed and employed. This pilot would create structured flexibility for providers when they have evidence of a candidate’s knowledge, skills, and abilities independent of their success on MTEL. It will expand opportunities for candidates who have the potential to be effective teachers to remain on their preparation path.

Communication and Literacy Skills Assessment Alternative: *The following proposal is designed as an alternative to the communication and literacy skills MTEL, which assesses candidates’ basic skills in reading and writing.*

1. **Acceptance of** [**Praxis Core**](https://www.ets.org/praxis/about/core/)
* **Proposal**: As a measure of essential communication and literacy skills, Massachusetts would now accept either the MTEL Comm/Lit or the Praxis Core. Praxis Core is an ETS assessment product used in approximately 26 states to assess candidates’ basic skills. Similar to the Communications and Literacy MTEL, the Praxis Core assesses reading and writing, but it also includes a math subtest. The Commissioner would set the cut score for licensure candidates on the Praxis Core, leveraging experience with setting cut sores on the MCAS and MTEL. The Department will also look at setting [cut scores that are consistent across other states](https://www.ets.org/s/praxis/pdf/passing_scores.pdf) that use Praxis Core to encourage reciprocity in recruitment efforts.
* **Current Policy**: Massachusetts currently requires educator candidates to pass the MTEL Communications and Literacy Skills assessment and does not accept other state licensure tests for any of our routes to licensure.
* **Rationale/Additional Considerations**:
	+ Schools and districts recruiting educators out of state have indicated that this would remove a barrier for candidates considering teaching in Massachusetts.
	+ While the MTEL Comm/Lit is a Massachusetts-specific assessment, it is not directly tied to or derived from the Massachusetts curriculum frameworks as the subject-matter tests are. This allows for flexibility in honoring other states’ requirements where comparability exists.
	+ This pilot would allow us to solicit feedback about the possibility of using other state assessments as demonstration of the competencies measured by the MTEL Communications and Literacy Skills assessment, though we would begin by focusing on Praxis Core.

**Attachment 2 – Draft Regulations for Educator Licensure and Preparation Program Approval, 603 CMR 7.00**

**PROPOSED AMENDMENTS TO REGULATIONS ON EDUCATOR LICENSURE AND PREPARATION PROGRAM APPROVAL, 603 CMR 7.00**

# The proposed amendment is indicated by underline (new language) in 603 CMR 7.04 (2)(e). For the complete text of the current regulations, 603 CMR 7.00, see <http://www.doe.mass.edu/lawsregs/603cmr7.html>

**603 CMR 7.04 Types of Educator Licenses, Requirements for Licensure, Licenses Issued, and Requirements for Field-Based Experience**

**Requirements for Teacher Licensure**.

**(1) Types of Licenses.**

(a)Provisional

(b)Initial

(c)Professional

(d)Temporary

**(2) Requirements for Teacher Licensure.**

 (a)**Provisional**. This is available only for licenses under 603 CMR 7.04 (3) (a)

1. Possession of a bachelor's degree.
2. Passing score on the Communication and Literacy Skills test.
3. Passing score on the subject matter knowledge test(s) appropriate to the license sought, based on the subject matter knowledge requirements set forth in 603 CMR 7.06, where available.
4. Competency Review for candidates seeking the following licenses:
	1. Teacher of students with moderate disabilities, teacher of students with severe disabilities, teacher of the deaf and hard-of-hearing, and teacher of the visually impaired.
	2. Fields for which there is no subject matter knowledge test available.
5. Additional requirements for the early childhood, elementary, teacher of students with moderate disabilities, teacher of the deaf and hard of hearing (Oral/Aural) and teacher of the visually impaired licenses:
	1. Seminars or courses on ways to prepare and maintain students with disabilities for general classrooms; for example, use of strategies for learning and of behavioral management principles.
	2. Passing score on the Foundations of Reading test.
6. Additional requirements for the teacher of students with severe disabilities, and teacher of the deaf and hard of hearing (American Sign Language/Total Communication) licenses: Seminars or courses on ways to prepare and maintain students with disabilities for general classrooms; for example, use of strategies for learning and of behavioral management principles.
7. Evidence of sound moral character.

(b)**Initial**

1. Possession of a bachelor's degree.
2. Passing score on the Communication and Literacy Skills test.
3. Passing score on the subject matter knowledge test(s) appropriate to the license sought, based on the subject matter knowledge requirements set forth in the Subject Matter Knowledge Guidelines. Where no test has been established, completion of an approved program will satisfy this requirement.
4. Completion of an approved route for the Initial license sought as set forth in 603 CMR 7.05.
5. For core academic teachers, possession of an SEI Teacher Endorsement.
6. Evidence of sound moral character.

(c)**Professional**

1. Possession of an Initial license in the same field as the Professional license sought.
2. Completion of a one-year induction program with a mentor and at least 50 hours of a mentored experience beyond the induction year.
3. At least three full years of employment under the Initial license.
4. Completion of one of the following:
	1. An approved licensure program for the Professional license sought as set forth in the Guidelines for Program Approval.
	2. A program leading to eligibility for master teacher status, such as those sponsored by the National Board for Professional Teaching Standards and others accepted by the Commissioner.
	3. For those who have completed any master's or higher degree or other advanced graduate program in an accredited college or university, at least 12 credits of graduate level courses in subject matter knowledge or pedagogy based on the subject matter knowledge of the Professional license sought; these may include credits earned prior to application for the license.
5. Additional requirement for the teacher of the deaf and hard of hearing license (American Sign Language/Total Communication): Passing score on a test of sign language proficiency approved by the Department.

(d)**Temporary**

1. Possession of a bachelor's degree.
2. Possession of a valid educator license or certificate from another state or jurisdiction.
3. At least three years of employment under such valid license or certificate.
4. Has not failed any part of the applicable licensure tests required by 603 CMR 7.04 (2) (a) 2. and 3.
5. Evidence of sound moral character.

(e) **Alternative Assessment Pilot**

The Department may conduct a pilot of alternative assessments identified or developed to satisfy the requirements of 603 CMR 7.04 (2) (a) (2) and (3) and 603 CMR 7.04 (2) (b) (2) and (3). Any alternative assessment identified or developed for this purpose shall be determined by the Commissioner to be comparable to the MTEL Communication and Literacy Skills test or subject matter knowledge test. The alternative assessment pilot period shall continue through June 30, 2023. Any candidate who passes an alternative assessment during that period will be deemed to have satisfied the requirements of 603 CMR 7.04 (2) (a) (2) or (a) (3), or 603 CMR 7.04 (2) (b) (2) or (b) (3), as applicable. During the period of the alternative assessment pilot, the Commissioner will report to the Board at least annually on any alternative assessments, including the number of candidates taking the alternative assessments, any evaluative information regarding these candidates, patterns of employment, and feedback from school districts and educator preparation programs. Prior to making any recommendations following the conclusion of the pilot, the Commissioner shall conduct or contract for an evaluation of the alternative assessment pilot.

1. Goldhaber, Dan, Roddy Theobald, and Christopher Tien (2019). “[Why we need a diverse teacher workforce](https://www.kappanonline.org/why-we-need-diverse-teacher-workforce-segregation-goldhaber-theobald-tien/).” *Phi Delta Kappan*, 100 (5), 25-30.  [↑](#footnote-ref-1)
2. [Egalite et al., 2015](https://sites.hks.harvard.edu/pepg/PDF/Papers/Egalite-et-al-2015-FLTM_EER.pdf); [Lindsay and Hart, 2017](https://poverty.ucdavis.edu/sites/main/files/file-attachments/exposure_to_same-race_teachers_and_student.pdf); [Holt & Gershenson, 2015](http://research.upjohn.org/up_workingpapers/231/); [Gershenson et al., 2017](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2940620) [↑](#footnote-ref-2)
3. [Bailey and Dynarski, 2011](http://www.nber.org/papers/w17633) [↑](#footnote-ref-3)
4. [Grissom et al., 2017](https://www.journals.uchicago.edu/doi/abs/10.1086/690274) [↑](#footnote-ref-4)
5. Beginning on p. 38 in the Guidelines for Program Approval: <http://www.doe.mass.edu/edprep/ProgramApproval.docx> [↑](#footnote-ref-5)