**603 CMR 4.00 Public Comments Summary for Phase I – February 2020**

The Department received a total of five comments from: the Massachusetts Teachers Association (MTA), a Quincy School Committee member, the Quincy Public Schools Executive Director of Career Vocational and Technical Education, the Vocational Technical Educator and Headmaster of Edward M. Kennedy Academy for Health Careers, and a vocational educator in Health Assisting.

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| **Summary of major themes from all public comment sources** | | |
| **DESE Proposed Change** | **Summary of Themes in Public Comment Received** | **DESE Response** |

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| **4.01 Purpose** |  |  |
| Changes “ensure” to “promote” |  |  |
| **4.02 Definitions** |  |  |
| No substantive change. The Department simply moved the definition of a Preliminary Vocational Technical Teacher License into the proper alphabetical order. | * Proposal (MTA) to change “Preliminary” to “Initial” so that it aligns with the licensure requirements for non-vocational educators located at 603 CMR 7.00. | * No change: The Department proposed no substantive change to this portion of the regulations, and merely re-ordered the term so that it appears in alphabetical order. Further, the requirements to obtain an Initial license for a non-vocational teacher, and the requirements for Preliminary vocational teachers are different. Giving them similar names may confuse educators seeking either license. |
| Adds reference to Strengthening Career and Technical Education for the 21st Century Act (Perkins V) |  |  |
| Adds to the Certificate of Occupational Proficiency definition |  |  |
| Adds a definition for Cooperative Education |  |  |
| Adds a definition for Chapter 74 Vocational Exploratory Program |  |  |
| Adds “professional” to definitions of Inactive Vocational Technical Educator License and Invalid Vocational Technical Educator License |  |  |
| Adds a definition for Pilot Vocational Technical Education Program |  |  |
| Adds a definition for Scope |  |  |
| Adds a definition for Sequence |  |  |
| Revises the definition of the Vocational Technical Literacy Skills Test |  |  |
| Adds a definition for Waitlist | * Proposal (MTA) to avoid adding the waitlist definition until a larger discussion regarding admission policies has occurred. | * No change: The waitlist requirement, and this accompanying definition, can be implemented now without compromising future changes to admissions requirements. Including it now will permit the Department to begin gathering data that will help inform possible revisions to the vocational admissions regulations. |
| **4.03 Program Approval Criteria** |  |  |
| 4.03. Revises the section heading to include “and Operational Requirements” |  |  |
| 4.03(4)(a)2. Adds a requirement that a program of study be of sufficient scope to address the applicable vocational framework and provide a minimum of 900 program hours | * EMK Charter School is concerned that the proposed 900-hour minimum for program time is too burdensome, and notes that the VTE Frameworks may provide more flexibility. * Quincy Public Schools Executive Director of Career Vocational and Technical Education is similarly concerned about the potential burden that the 900-hour requirement could impose on comprehensive high schools, and suggests a more flexible approach such as making it a guideline, not a requirement. * A Quincy School Committee member raises similar concerns about the potential burden a 900-hour requirement could impose, and suggests it be a guideline. | * Change: The Department proposes to qualify the 900-hour requirement with additional language that a program provide a minimum of 900 program hours, “or as otherwise specified in the applicable Vocational Technical Education Framework.” Vocational programs are often governed by specific program hours requirements necessary for students to earn their professional licensure, though such hours requirements may vary from program to program. Adding this new reference to the VTE Frameworks allows greater flexibility to include industry-specific expectations where appropriate. |
| 4.03(4)(a)3. Adds a requirement that a program of study include a sequence of courses that build on past knowledge/skills across grade levels |  |  |
| 4.03(4)(e) Requires that exploratory programs, which permit vocational students to explore different fields of study before committing to a particular major, be based on the applicable Vocational Technical Education Framework and Massachusetts Curriculum Frameworks |  |  |
| 4.03(4)(e) Clarifies that districts cannot report an exploratory program to the Department as eligible for vocational program state funding unless they operate at least five Chapter 74 programs, with the exception of the agricultural schools |  |  |
| 4.03(5)(f) New language related to the qualifications of teachers in pilot programs | * Proposal (MTA) that employment as a Pilot Program teacher should count toward Professional Teacher Status “or other rights” under M.G.L. c. 71 § 41. | Change: The Department accepts the proposal that employment as an approved Pilot Program Teacher may be counted towards Professional Teacher Status, and has revised the draft to reflect this. |
| 4.03(6)(b)1. Adds that the grade 9 exploratory exception, which already permits students to apply to exploratory programs in other districts for agricultural and natural resources programs, includes concentrations within those programs, and includes the new program for aviation maintenance technology |  |  |
| 4.03(6)(b)2. New language that explains student and school district responsibilities when a student moves to a new district after the April 1 non-resident vocational tuition application deadline |  |  |
| 4.03(6)(b)3 Adds language clarifying that non-resident vocational students have a right to remain in their current vocational school, unless they change programs or move out of their district of residence |  |  |
| 4.03(9) Adds requirement that schools maintain waitlists and report that data to the Department | * Proposal (MTA) to avoid adding a waitlist requirement until the admissions portion of the regulations is revised later in 2020. | * No change: The waitlist requirement can be implemented now without compromising future changes to admissions requirements. Including it now will permit the Department to begin gathering data that will help inform possible revisions to the admissions regulations. |
| **4.04 Program Approval Procedures and Policies** |  |  |
| 4.04(6) Permits programs closed through approved closure plans to operate as general education programs. This means those programs no longer receive state vocational funding but they may, with Department approval, continue to operate and be eligible for federal vocational Perkins funding |  |  |
| **4.05 Program Outcomes** |  |  |
| 4.05(3) Clarifies for the indicators of Outcome III that post-secondary education or training must be related to the program of study |  |  |
| **4.06 Unpaid Off-Campus Construction and Maintenance Projects** |  |  |
| **4.07 Types of Vocational Technical Teacher Licenses, Requirements for Licensure and Licenses Issued** | * The Department received a comment from a Health Assisting Teacher who voices her support for streamlining licensure requirements and providing additional pathways to licensure, having found the existing course substitution process overly burdensome. | * No change |
| 4.07(2)(b)2i Changes title of Operating Room Technology to Surgical Technology |  |  |
| 4.07(2)(e) Clarifies that licensure candidates must pass one of two available test options. |  |  |
| 4.07(2)(f) Removes requirement that employment experience be “recent” | * MTA supports the Department’s proposed removal of restrictions on prior industry-based employment. | * No change |
| 4.07(2)(g) Removes a licensing exemption for Criminal Justice teachers |  |  |
| 4.07(4)(e) Removes reference to Criminal Justice exemption discussed above |  |  |
| 4.07(4)(g)1. through 7. Reduces the number of college degree credits required for professional licensure from 39 to 36, and builds in more flexibility for credit requirements | * Proposal (MTA) to delete “degree” and “college degree” from requirements. * Proposal (MTA) to add “at the 100 level or higher” for course requirements. * Proposal (MTA) to add “or industry-specific occupational safety coursework” as an alternative to the existing science requirement. * Proposed new subsection (MTA) that would automatically make “[p]ossession of industry-based educator preparation coursework or an Initial or Professional license issued under 603 CMR 7.00 in a field accepted by the Department” eligible for a course substitution review by the Department, and requiring the Department to draft corresponding guidelines. * Proposed deletion (MTA) of “or,” which would permit certain administrators to leverage years of employment “or” practicums towards licensure requirements. * Proposal (MTA) to simplify the suggested language for 18 “academic” college credits for the Professional license and streamline the process for those with a bachelor’s degree or higher. | * No corresponding change. The words “degree” and “college degree” will remain for clarity. * No corresponding change, as “degree” and “college degree” remain. * No corresponding change. The Department already has a policy of accepting appropriate industry-specific occupational safety coursework toward the science requirement. * No corresponding change. The course substitution process is not addressed in the vocational regulations. Under Department policy, however, it may be available for applicants who request it. The professional education courses required by the vocational education regulations cover topics specific to career and technical education programs (e.g. managing a vocational shop), that are not necessarily found in coursework completed for an Initial academic license. As such, to maintain a high level of educator preparation, careful attention must be paid to whether applicants’ completed coursework covered the necessary objectives. * No corresponding change. The MTA did not provide a reason for this proposed change, and the Department believes the flexibility of offering these as alternatives will help create additional pathways to licensure. * Change: The Department accepts the proposal in which an applicant for a Professional license with a bachelor’s degree or higher would have automatically satisfied the requirements in 603 CMR 4.07(4)(2) through (5), on the belief that an individual who has earned a Bachelor’s degree from an accredited university will have received a well-rounded level of education that is equivalent to an individual who has completed the required 18 academic credits. |
| 4.07(4)(g)8. Adds new language reducing the number of college credits required for educators seeking professional licensure in a field operated only at the post-secondary level |  |  |
| 4.07(5) Changes “will be” issued to “may be” issued |  |  |
| 4.07(5)(e) Renames Machine Tool Technology as Advanced Manufacturing Technology |  |  |
| 4.07(5)(f) Renames Operating Room Technology as Surgical Technology |  |  |
| 4.07(5)(j) Adds Aviation Maintenance Technology |  |  |
| **4.08 Type of Vocational Technical Administrator Licenses and Requirements for Licensure** |  |  |
| 4.08(6)(f) As above for 4.07(2)(e), clarifies that licensure candidates must pass one of two available test options |  |  |
| **4.09 Types of Vocational Technical Cooperative Education Coordinator Licenses and Requirements for Licensure** |  |  |
| 4.09(2)(d) As above for 4.07(2)(e), clarifies that licensure candidates must pass one of two available test options |  |  |
| 4.09(3)(a) Adds “A high school diploma, the equivalent, or higher degree” to requirements for initial vocational technical cooperative education coordinator license |  |  |
| 4.09(3)(c) Removes requirement that employment experience be “recent” |  |  |
| 4.09(3)(e) As above for 4.07(2)(e), clarifies that licensure candidates must pass one of two available test options |  |  |
| **4.10 Professional Standards** |  |  |
| **4.11 Preliminary Vocational Technical Teacher License** |  |  |
| 4.11 Changes section title from “Preliminary Vocational Teacher License Renewal” to “Extension of a Preliminary Vocational Technical Teacher License” |  |  |
| 4.11(1) Deletes language that permits licenses to be renewed only in cases of extreme hardship, and adds language permitting Preliminary vocational educator licenses to be extended when an educator requires additional time to complete the necessary coursework |  |  |
| 4.11(2) Specifies conditions under which licenses may be extended |  |  |
| **4.12 Professional Vocational Technical Educator License Renewal and Professional Development** |  |  |
| 4.12(8)(3) Starting July 1, 2021, requires vocational administrators and cooperative coordinators (those who supervise vocational students in work-based learning opportunities) to earn at least 15 Professional Development Points (“PDPs”) in the field of their license |  |  |
| **4.13 General Provisions Regarding Educator Licensure** |  |  |
| 4.13(1) Adds language permitting the collection of fees on license extensions |  |  |
| 4.13(4) Adds a new section creating pathways for vocational administrators to earn new licenses | * Proposal (MTA) that a licensed administrator be exempt from the Communication and Literacy Skills test, as part of a larger proposal (see below) to eliminate communication and literacy skills tests from licensure requirements. | * No change: Educators who have previously passed the Communication and Literacy test do not need to take the test again; however, any previously licensed educator who has not passed it must demonstrate this skill in order to obtain a new administrator license. The Department believes all licensed vocational administrators should demonstrate their ability to communicate effectively. |
| 4.13(13) Adds language that permits individuals who apply for and complete all requirements for Vocational Technical Education licensure prior to July 1, 2021, to qualify for their license by meeting the requirements under 603 CMR 4.00 in effect prior to June 26, 2018 |  |  |
| **4.14 Certificate of Occupational Proficiency** |  |  |
| 4.14 Removes the requirement that a student must receive a passing score, as determined by the Commissioner, on the written test and the performance test for the Certificate of Occupational Proficiency |  |  |
| **4.15 Endorsements** |  |  |
| **4.16 Pilot Programs** |  |  |
| Adds a new section that provides a roadmap for districts to pilot new vocational technical education programs that have potential for statewide approval | * Proposal (MTA) that employment as a Pilot Program teacher should count toward acquiring Professional Teacher Status. | Change: The Department accepts the proposal that employment as an approved Pilot Program Teacher be counted towards Professional Teacher Status, and has revised this section accordingly. |
|  | **Additional Proposed Regulatory Changes Not Included as Part of the Public Comment Process** | **DESE Response** |
| 603 CMR 4.02 and all references to use of the word “guidelines” throughout the vocational technical education regulations | * Proposal (MTA) to create a definition for “guidelines” which must be approved by the Commissioner and require public comment for a minimum of 30 days, to align with the definition of this term as used in 603 CMR 7.00. | * No change. The Licensure provisions of 603 CMR 7.00 are more narrowly focused than the VTE regulations, which cover a wide range of issues, only one of which is licensure. The Department creates its guidelines with extensive feedback from stakeholders and updates them as needed to reflect ongoing developments in education and industry. Mandating a more formal process would unduly burden the Department’s ability to respond to changes in the field. |
| 603 CMR 4.02 and all references to use of the phrases “Communication and Literacy Skills Test” and “Vocational Technical Literacy Skills Test.” *See, e.g.,* 603 CMR 4.07(2)(e); 4.08(6); 4.09(2); 4.09(3); 4.13(4)(a)2; 4.13(4)(b)2; 4.13(4)(c)3 | * Proposal (MTA) to eliminate both the Communication and Literacy Skills Test and the Vocational Technical Literacy Skills Test, wherein passing one of the exams is currently required for licensure. | * No change. The Department believes all candidates for licensure must demonstrate basic communication and literacy skills. Moreover, should the MTEL pilot as proposed in 603 CMR 7.00 be approved, candidates for licensure in 603 CMR 4.00 would be eligible to use any test accepted by the Department in the pilot as evidence of passing the Communication and Literacy Skills test requirement. |
| 603 CMR 4.02 and all references to the phrase “Individual Professional Development Plan.” See, e.g., 603 CMR 4.12(5)(a)1; 4.12(6)(a); 4.12(8)(g)1,3,4 | * Proposal (MTA) to eliminate the requirement of an Individual Professional Development Plan (IPDP) as part of the License Renewal Process. | * No change. The IPDP is required for core academic teachers. VTE programs often have a mix of teachers with differing types of licensure. For example, in an engineering program, one teacher may have a core academic teacher license in Technology/Engineering, while another may have a VTE teacher license in Engineering Technology. The Department believes it may be confusing to only require the teacher with a core academic license (603 CMR 7.00) to have an IPDP, and not the teacher with a vocational license. |