The Department of Elementary and Secondary Education (DESE) received over 350 public comments on the proposed amendments.

* DESE has reviewed all the comments. The comments and DESE’s response are summarized below.
* 223 (181 full responses / 42 partial submissions) were responses to the survey used to collect public comment. Please see link [here](https://reporting.alchemer.com/r/72307_647e01ddd80d98.33029384) to the summary report to view the comments submitted through the survey.
* 151 organizations and individuals submitted public comment through emails and mail. Copies of the emails and mailed-in comments are available upon request.

**List of organizations and individuals submitting public comment:**

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| **Organizations/Groups** | **Individuals** |
| * Alliance of Massachusetts YMCA’s * American Federation of Teachers-Massachusetts (AFT) * Bay State Council for the Blind * Center for Law & Education * Council on Education for the Deaf * Lasell University * Massachusetts Advocates for Children * Massachusetts Association of Approved Special Education Schools * Massachusetts Organization of Educational Collaboratives (MOEC) * Massachusetts School Nurses Organization * National Association for the Deaf * National Federation of the Blind Massachusetts * Massachusetts Teachers Association (MTA) * The Learning Center for the Deaf Parent Association Board * Wheelock School of Education, Boston University, Faculty of Deaf Studies | * Individuals submitting survey:   + 49.5%: Teacher/Instructional Coach   + 22%: Other   + 13.8%: Parent/Community Member   + 11%: School Administrator   + 7.8%: District Administrator   + 4.6%: Educator Preparation Faculty/Administrator   + .5%: Student |

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

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| Allow educators with Initial and Professional licenses to obtain Provisional licenses in certain fields | **68% support / 9.6% support with edits (based on surveys only)**  **Teacher of the Deaf and Hard of Hearing Provisional License**   * About 130 comments, including The Learning Center for the Deaf Parent Association Board, focused on Teacher of the Deaf and Hard-of-Hearing (DHoH) – Opposing the change allowing a teacher to add a Provisional DHoH option   + Questions whether the current subject matter knowledge requirements are adequate   + Question the current ability to obtain a DHoH Provisional license, separate from the proposal to allow a teacher with an Initial or Professional license to obtain a Provisional DHoH license. * Districts don't have expertise or capacity to provide ongoing mentoring, supervision, evaluation in American Sign Language/Total Communication (ASL/TC) or Oral/Aural deaf education pre and post Provisional licensure   **Teacher of the Visually Impaired Provisional License**   * Oppose allowing these licenses for teachers of visually impaired (Superintendent of Perkins School for the Blind; President, Bay State Council of the Blind; President National Federation of the Blind Massachusetts)   **English as a Second Language Provisional License**   * Concern with adding Provisional English as a Second Language (ESL) with only the test, noting that for the special education licenses, applicants need to have two years of experience working with special education students (AFT Massachusetts) * For ESL, suggest possession of SEI Endorsement or two years of experience in second language acquisition for English learners (MTA) * Allow Bilingual Education MTEL to count for ESL license * Against the ability to add an ESL license, believe it may lead to more dual and triple licensed teachers and then water down the service levels. Not in favor of adding it for special education either and believe it could lead to more MCAS-Alt tracks. (Center for Law and Education)   **Provisional Licenses in Other Special Education Fields or Generally**   * Supports the proposal (MA Organization of Education Collaboratives (MOEC)) * I agree with this amendment. Teachers will be able to continue to further develop their capacity to teach all students. * I think this is an excellent opportunity for teachers who are trained in the general curriculum to explore new and exciting possibilities in a more specialized area. I have found that classroom teachers who transition into a more specialized role like ESL or SPED have a broad understanding of students as a whole and well as their specific targeted needs. * Require coursework to move from provisional to initial   + One suggestion for this coursework: IEPs, WIDA, ACCESS testing, etc. * Not in favor of allowing a teacher with Initial or Professional licensure to obtain a Provisional license in special education or ESL. (MA Advocates for Children) * MTA and AFT supported these licenses but noted that some educators may have already taught for 5 years under earlier Provisional licenses and would not have any remaining eligibility. * If the regulation is approved to add a Provisional license in special education and ESL, require an induction program in the first year of employment in the new role. * Massachusetts already has one of the largest achievement gaps between students with disabilities and students without disabilities. Lowering the bar on teacher preparation is not in the best interest of our students. * In favor of increased flexibility and access to special education teacher licensure; also encourage permitting student teaching in approved special education schools.   (MAAPS) | Changes are recommended. In response to significant concerns about the proposal to allow holders of Initial or Professional licenses to add Provisional licenses in the fields of Teacher of the Deaf and Hard-of-Hearing and Teacher of the Visually Impaired, DESE has removed these fields from the proposed amendments. Under the modified amendment, Provisional licenses will be available in the fields of Teacher of Students with Moderate Disabilities (PreK-2), (Prek-8) and (5-12), Teacher of Students with Severe Disabilities (PreK-2) and (all), and English as a Second Language (ESL).  Also, in response to comments that recommended adding an experience requirement for initially or professionally licensed teachers to add a Provisional license in ESL, the revised proposed regulations now require an applicant holding an Initial or Professional license to have at least two years of experience in second language acquisition and sheltering content for English learners in order to add a Provisional license in ESL. |
| Create a new grade span, PreK-2, for teacher of students with moderate and severe disabilities | * **79.9% support / 5.3% support with edits (based on surveys only)** * Several organizations, including the MTA, the AFT and Mass Advocates for Children, supported the creation of the new PreK-2 licenses. * Add this option for Deaf and H-o-H (MOEC) * Levels should be expanded up to 4th grade * Extensive preparation is still needed * With the autism population rising and an abundance of teachers holding Elementary or PreK-2 licenses, this new license will help new teachers go into the specialized fields. * I think this is an excellent idea considering many of our youngest learners are requiring SPED services. * Concern that the proposed changes will result in teachers not being adequately prepared to provide specially designed instruction and address IEP requirements for students with disabilities (Lasell University) * Concerned that availability of the new PreK-2 moderate and severe disabilities license may negatively impact community programs if early childhood staff add this license and leave them for the public school PreK-12 system. (Alliance of MA YMCAs) | Given the support for this proposed amendment, we will keep the proposed new PreK-2 level licenses for Teacher of Students with Moderate and Severe Disabilities. The levels for these new licenses align with the Early Childhood, PreK-2 license and educator candidates will still need to demonstrate the Subject Matter Knowledge requirements as outlined in Guidelines – see link [here](https://www.doe.mass.edu/edprep/domains/instruction/smk-guidelines.docx). DESE has modified the amendment as initially proposed in April, to specify that the Early Childhood MTEL test is the test for this PreK-2 license, as it includes elements such as child development and the science of early learning. |
| Allow applicants for Provisional licenses to meet a requirement through demonstrating knowledge, as an alternative to meeting the requirement by taking a course or seminar | * **66.7% support / 7.3% support with edits (based on surveys only)** * The state needs to define the parameters of course length, content, and evaluation that are aligned with teacher preparation accreditation requirements. The parameters should be defined by experts from institutions of higher education/ teacher preparation programs in collaboration with the state and school district leaders. (Lasell University) * Demonstrating experience and knowledge while on-the-job can often be more meaningful than some coursework. * This will allow teachers to go into these fields without taking a course and seminar which would be a huge incentive for them to stay/go into these specialized fields. * I would suggest that one part of their "demonstrated knowledge gained through experiences" should include having them discuss a few typical scenarios that might happen. This would give external, common data on the applicants, in addition to their experiences in their appropriate classroom. * MTA and AFT both supported this amendment but noted that DESE will need to provide clarity regarding how knowledge is demonstrated. | No changes are recommended to the proposed amendments. DESE will address questions and concerns raised in the comments by issuing administrative guidance for applicants and school districts.  There are a variety of ways applicants can demonstrate content knowledge for Provisional licensure. Allowing applicants to meet the requirement of “ways to prepare and maintain students with disabilities for general classrooms” by demonstrated knowledge gained through experiences, such as the [Structured Guidance and Supports](https://www.doe.mass.edu/licensure/academic-prek12/sgs/) performance-based assessment, in an appropriate classroom is comparable to a course or seminar.  DESE’s Educator Licensure Office will issue an advisory to inform applicants how to satisfy this requirement and will provide instructions and a template for districts to complete to document an applicant’s satisfaction of the requirement. |
| New Provisional license for School Nurses | * **72.5% support/ 5.8% support with edits (based on surveys only)** * Would like to add (1) at least one year of experience as a RN; (2) two of the four components of the orientation program required to get the Provisional license (Foundations of School Nursing Practice & Medication Administration in a School Setting: School Nursing Practice in MA; (3) MTEL should not be required for a Provisional license but is required for Initial. (MA School Nurses Association) * I agree with this amendment, nurses should have the opportunity to receive a provisional license. * There should be higher standards * DESE should recognize Nursing Board certification * The Communication and Literacy Skills MTEL requirement is a deterrent * The new provisional license for nurses will bring more experienced nurses into the school setting. This license will help to encourage nurses in the hospital/community/clinic setting with vast clinical experience to practice in the school setting. A well trained nurse with both theoretical and hands on practice is essential to practice in a school setting. School settings are considered a well milieu. However, with more complex clinical treatments becoming mainstream school health offices have to adapt to the care and treatment changes. By allowing nurses this provisional license it will give nurses the opportunity to bring their clinical practice into the school. | Changes are recommended. Based on public comment, DESE has revised the proposed amendment to specify that applicants for a Provisional School Nurse license must also complete portions of the required [orientation program](https://cme.bu.edu/shield.bu.edu) for school nurses approved by the Department of Public Health and identified by DESE in guidance. At the outset, the Department anticipates requiring 2 of the 4 segments: Foundations of School Nursing Practice and Medication Administration in a School Setting. As revised, the proposed amendment provides flexibility in specifying the required segments of the orientation program, as the program may change over time. |