**603 CMR 7.04 (2) (e) Public Comments Summary for Phase I – October 2020**

The Department received a total of 323 comments, including group comments from:

All State Universities, American Federation of Teachers (AFT) Massachusetts, Diverse Teacher Workforce Coalition of Western MA, Journey into Education and Teaching (JET), KIPP Massachusetts, Lawrence Public Schools, Lesley University, Massachusetts Association of Colleges of Teacher Education (MACTE), Massachusetts College of Art and Design, Massachusetts Partnership for Diversity in Education, Massachusetts Teachers Association (MTA), Reed Academy, Salem State University, Standing Committee on Professional Educators (SCOPE), Teach Western Mass Inc., UP Education Network and Wayland Public Schools.

**Proposed Amendment in whole:**

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), and 603 CMR 1.06 (4) (a). 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), or 603 CMR 1.06 (4) (a), 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.

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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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| **Standardized Testing** | * MTA supports the alternative assessment amendment as the MTEL assessment has “predictable pass rate differentials by demographic characteristics of candidates” that “creates a substantial barrier to building a diverse teaching force in Massachusetts.” * AFT Massachusetts suggests “eliminating some MTEL tests altogether or at least modifying the tests to better reflect the knowledge and skills teachers need to be successful”. * MTA suggests waiving the Communications and Literacy MTEL requirement “if the waiving of this MTEL increases educator diversity and removes an unnecessary and unfair barrier to becoming a teacher in Massachusetts.” * Lesley University requests “an examination of policies and practices for approving test accommodations for those with documented learning differences”. * Salem State University explains that “By centering testing as a standard by which teacher licensure candidates enter the field, we actively indoctrinate that testing is the standard by which pupils must be assessed, reinforcing the institutionalization of testing which we already know produces disparities between racial groups and multilingual students--both of whom are among the most underrepresented within the teaching profession.” * Salem State University highlights “operational gaps between changes in knowledge in the field and test updates (e.g., Physical Education, History) that disadvantage teacher candidates in particular licenses.” * Support from an Educator Preparation Faculty/Administrator for alternative students who do well in classes, are effective in field based experience, yet struggle with test-taking. * Support from multiple Educator Preparation Faculty/Administrators for acknowledging the shortcomings of the entire system of “high stakes” testing as a method of establishing credentials. * Support from KIPP MA for removing a barrier for talented educators based on evidence that standardized tests are culturally biased. * Support from an Executive Director, citing high disparities in MTEL failure rates and wanting a “certification that would be less culturally compromising”. * Support from a vocational teacher who wants to broaden what “communication” can look like. * Support from a Director of Professional Learning and a teacher/instructional coach for prospective educators to “have the opportunity to demonstrate their knowledge and skills through means other than a test.” * Concern from a teacher/instructional coach and multiple parents/community members of the hypocrisy to have alternative assessments for teachers but not for students who want to graduate in MA. * Support from a school administrator who would like alternatives for test-takers with disabilities. * Support from a district administrator and an Educator Preparation Faculty/Administrator who believes in the “right to accommodations or alternative assessments”. * Support from a teacher/instructional coach and a district administrator who believes that “We often seek alternative ways to test students in the field....it only makes sense to do this for teachers as well.” * Support from a teacher/instructional coach and a retired administrator who believes that “Passing a standardized assessment for teachers has very little practical value in a classroom.” * Mixed support from a teacher/instructional coach who believes that “Teachers spend too much class time evaluating themselves.” * Support from multiple Educator Preparation Faculty/Administrators to address disparities in MTEL results for underrepresented groups. * Mixed support from an Educator Preparation Faculty/Administrator who would like more information about bias in MTEL. * Support from a teacher/instructional coach who believes that every test can be biased, and alternatives address the “constellation of strengths and weaknesses”. * Support from a district administrator who wants different methods to demonstrate knowledge and expertise. * Mixed support from an Educator Preparation Faculty/Administrator who values “the uniform state-wide requirement regime because it means that the local faculty upholding high standards do not have to be the "bad guys" at the institution. In my view, the introduction of rigorous MTELs, especially in elementary education, has strengthened many programs across the Commonwealth.“ | DESE Response:  DESE acknowledges the comments concerning the role and stakes associated with standardized testing and the influence that has within our education system. As mentioned in these comments, we see this pilot as an opportunity to explore important and potential alternatives.  The pilots are bounded by current [State Law](https://malegislature.gov/laws/generallaws/parti/titlexii/chapter71/section38g) which requires that educators:  pass a test established by the Board [of Elementary and Secondary Education] 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  Based on this law, DESE does not have authority to waive a test requirement.  DESE is currently in the midst of the most comprehensive update of MTELs since the program began. Information about these changes and opportunities to be part of objective/item committees can be found [here](http://www.mtel.nesinc.com/PageView.aspx?f=HTML_FRAG/GENRB_ProgramUpdate.html).  We continue to work with our testing vendor, Evaluation Systems of Pearson, on test accommodations and encourage feedback on concerns related to these accommodations. |
| **Access to Alternatives** | * Hope from an Educator Preparation Faculty/Administrator for straightforward access to Alternative Assessments. * Support from a school administrator who believes that alternative assessments would help in fields “where teacher applicants are scarce (specifically special education/teachers of the deaf)”. * Mixed support from an Educator Preparation Faculty/Administrator who wants alternative assessments to be available for all candidates if they are available for some. * Questions from a school administrator about eligibility. | No change: The Department proposes no change to the regulations related to this group of comments; however, the details of individual alternative assessments to be piloted will consider these concerns. |
| **Individual Experiences with Testing/Licensure** | * Support from a school administrator who has had success with alternative pathways for Special Education Teachers. * Support from multiple teachers/instructional coaches who had difficulty passing the required MTELs to work with students with severe special needs. * Support from a teaching assistant and a current student who are having a hard time passing required MTEL. * Support from a parent/community member who could not become licensed in library media science due to not finding a certified mentor. * Support from an ESL coordinator who has test anxiety. * Support from a teacher/instructional coach who had trouble passing two MTELs in 8 years. * Support from an Educator Preparation Faculty/Administrator whose “own scholarship supports the development of alternative assessments to the MTEL as a high-stakes gateway to the profession.” * Support from an Educator Preparation Faculty/Administrator who has had to “sign out of our teacher prep program too many promising teacher candidates because of the MTEL exams”. * Support from a teacher/instructional coach who co-taught with “an amazing Special Educator who has been able to pass all but the Reading MTEL”. * Support from an educational consultant and former superintendent who experienced “good teachers from good colleges unable to pass the MTELs”. * Support from a district administrator who “cannot express the sadness and misfortune when we see the quality and invested candidates not become licensed teachers due to testing.” * Support from an Educator Preparation Faculty/Administrator who have lost “students who would otherwise be outstanding teachers. The students whom I refer to often have GPAs over 3.3, strong recommendations from their teachers, and MTEL scores over 230 but under 240. Many of them are from low income households and cannot afford to keep taking the MTEL.” * Support from an ELL teacher on a second waiver who is struggling with exams. * Support from a teacher/instructional coach who wants to pass the math MTEL but has trouble finding prep classes with an ASL interpreter. * Support from a teacher/instructional coach who has experience with effective and engaging “paras and/or substitute teachers/ or teachers on waiver”. | No change: The Department proposes no change to the regulations related to this group of comments.  It is also important to note DESE strongly discourages individual preparation providers from deciding to exit candidates based on their not having passed the MTEL, as detailed in a recent [advisory](http://www.doe.mass.edu/edprep/resources/guidelines-advisories/mtel-use-advisory.docx) to the field. |
| **Pedagogy** | * Concern from an Educator Preparation Faculty/Administrator for a potential path to an initial license with no pedagogical preparation (“without taking a single class in how to teach”). * Hope from an Educator Preparation Faculty/Administrator for the alternative assessment to be based on pedagogy and practice. * Mixed support from a teacher/instructional coach who believes that “supporting new teachers in an organic way, in their classrooms” is just as important as a university degree. | No change: The Department proposes no substantive change to the regulations related to this group of comments. Individual pilots may incorporate pedagogy and practice.  Additionally, it is important to note that the MTELs are not designed to assess pedagogy. See the Subject-Matter Knowledge (SMK) Continuum on page four of the [SMK Guidelines](http://www.doe.mass.edu/edprep/domains/instruction/smk-guidelines.docx). |
| **Pilot and Evaluation** | * Massachusetts Teachers Association recommends “that the DESE remove the proposed deadline of June 30, 2023 and instead adopt a rolling three-year pilot period for any single alternative assessment option. This approach will provide the flexibility to develop assessment options with stakeholders without being constrained by a deadline. Two of the three proposed pilot programs will require extensive partnerships with stakeholders; the proposed cutoff may not allow for thoughtful planning or a meaningful implementation period.” [proposed language included in letter] * Recommendation from an Educator Preparation Faculty/Administrator to add: “The results of the evaluation of the assessment pilot will be shared broadly with educator preparation providers and community stakeholders to allow for additional input prior to final recommendations.” * AFT Massachusetts suggests “three criteria by which these pilots should be judged: quality, feasibility, and flexibility”. * Salem State University requests that “the state will disaggregate its pilot data by racial group at both the teacher and pupil levels in order to assess the benefits and outcomes of the study to determine its success.” * MACTE supports the “opportunity to collect sufficient data to determine the effective or ineffectiveness”. * Support from Lesley University with questions about “the expectations for eligibility and the design and implementation of a rigorous alternative assessment”. * Support from an Educator Preparation Faculty/Administrator as well as Springfield College Educator Preparation Council for the pilot duration and associated evaluation. * Support from a district administrator for external validation to maintain high performance standards for educators. * Questions from an Educator Preparation Faculty/Administrator about the format and validity/reliability/bias of the alternative assessments. * Questions from a former teacher who would like more information on assessment outcomes in order to support. * Questions from a parent/community member who wants to know: “How will the alternative methods be validated to show that potential educators have met the high standards that Massachusetts has set?” * Questions from an Educator Preparation Faculty/Administrator who wants to see the results of college teacher preparation before fully commenting. * Questions from a district administrator who wants to know if test reciprocity will have appropriate (not equal) rigor. * Support from an Educator Preparation Faculty/Administrator who has confidence in Ed Prep to pilot the alternative assessments. * Support from an Educator Preparation Faculty/Administrator for the Commissioner to conduct or contract an evaluation of the pilots. * Questions from a teacher/instructional coach about program evaluation, specifically addressing racial bias in the alternatives. * Support from a school administrator who wants to know about the alternative pathways by subject area, specifically Math. * Questions from an Educator Preparation Faculty/Administrator about the “resources (expertise & money) that I am concerned our institution may not have, or be able to provide”. * Questions from a district administrator who needs additional information as the current requirements are not ineffective, and it is “unclear as to why there is a need to create subjectiveness into the licensure process”. * Support from an education program “As long as the assessment period is implemented fairly, inclusively and transparently”. | Timeline Change: We have extended the time for the pilot from 6/30/2023 to 6/30/2024 to allow for additional time to operationalize and evaluate the pilots.  The Department will provide annual updates to the Board on the pilot that will be available for the public.  The Department plans to disaggregate the pilot data by race/ethnicity across all alternatives. |
| **Support Increased Racial Diversity** | * AFT Massachusetts supports “DESE’s stated goal of increasing diversity among the Massachusetts educator workforce”. * Support from multiple Educator Preparation Faculty/Administrators for expanding educator recruitment pipelines to increase diversity. * Support from a teacher/instructional coach to increase diversity in public education. * Support from KIPP MA to decrease the barriers that disproportionately affect aspiring young teachers of color. * Support from UP Education Network for “higher retention rates of teachers of color and an increase in the pipeline of new teachers of color entering the education workforce.” * Support from a school adjustment counselor for encouraging and support people of color entering into the field of education. * Support from a district administrator to “recruit more educators of color and from diverse backgrounds”. * Support from an Educator Preparation Faculty/Administrator to diversity the MA teaching force. * Support from an Educator Preparation Faculty/Administrator for candidates of color who may feel like the only people of color in their community. | No change: The Department proposes no change to the regulations related to this group of comments. |
| **Student Impact** | * Massachusetts Teachers Association believes “that all students benefit from diverse teachers”. * Support from UP Education Network who wants to focus on “moving the needle for our students academically as well as creating strong bonds with students and families.” * Support from a parent/community member who believes that the certification/re-certification process hurts students. * Support from KIPP MA who have seen increased student growth and achievement due to the impact and expertise of teachers of color. * Support from an Educator Preparation Faculty/Administrator who knows “for certain the impact that is made when students are able to see themselves in the educational environment”. * Support from a Career Center Executive Director who believes that diversifying the teacher workforce will positive impact students of color. * Support from a teacher/instructional coach who believes that the MTEL does not relate to “what makes you a teacher”: positive praise, snacks for children who have not eaten, deodorant, “how to plan with purpose, have pride in my work and show my passion to mold minds of a new generation of eager learners”. * Support from an Educator Preparation Faculty/Administrator who is also thinking about the impact on the students those licensed using an alternative assessment would serve. * Support from a teacher/instructional coach who wants “our youth to see role models in their teachers, when some of them may not see that at home.” * Concerns from a parent/community member who wants their children to have “qualified teachers who can pass a test.” | No change: The Department proposes no change to the regulations related to this group of comments. |
| **Mentoring and Support** | * AFT Massachusetts suggests creating strong teacher induction and mentoring programs. * Support from a school administrator who wants to find ways to encourage, mentor, and support educators as “fewer are willing to risk going into this field”. | No change: The Department proposes no change to the regulations related to this group of comments. |
| **Portfolio Approach** | * Support from a district administrator who would be confident endorsing an individual who has given evidence of efforts towards passing the MTEL. * Support from a parent/community member who thinks that a competency-based portfolio is a good idea for teachers and administrators. * Support from a district administrator who requests “an assessment that allows for consideration of a portfolio of intense professional development in a particular content area, particularly the Math MTEL Subtest, which is required for licensure for Moderate or Intensive Disabilities, Teacher of the Deaf, and other licenses.” * Concerns from an Educator Preparation Faculty/Administrator that a portfolio requirement “could never replace the need for the candidates to be completely fluent and flexible with the difficult material”. | As with the potential pilots already under consideration, DESE will also review and discuss this portfolio-based option as a possible alternative. As is the case for alternatives being considered, DESE remains bound by state law which, as stated above, specifies that educators “pass a test … 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” |
| **Financial Implications** | * AFT Massachusetts suggests lowering or eliminating MTEL fees. * AFT Massachusetts suggests “establishing student loan forgiveness programs for those who teach in Massachusetts schools for a certain number of years”. * AFT Massachusetts suggests “improving teacher pay and working conditions so we can retain the great teachers we do recruit and train”. * Lesley University requests “an exploration of policies that might provide some financial cost differentiation for individuals re-taking tests?” * Salem State University highlights “The need for financial assistance to pay for the exam fees for students at our sponsoring organization continues to exceed the number of vouchers allotted each year,   while the costs for test preparation continue to rise.”   * Support from a district administrator who says that it is “far too expensive for new teachers to have to pay more than once”. * Mixed support from a teacher/instructional coach who believes that “The major hurdles in recruiting more diverse educators are not about MTEL as such, but rather the unpaid work of student teaching, and the overall expense of attaining educational credentials. Facing a teacher shortage in many areas, it is unreasonable to expect individuals from diverse backgrounds to pay out of pocket unprecedentedly high tuition and fees in order to acquire a below-average pay job. These conditions must be addressed, and the bar of teacher quality not lowered.” * Support from a teacher/instructional coach who spent “$10,247 over the last 10 years” on MTEL prep classes, tutors, and tests. * Support from a teacher/instructional coach who wants to “level the playing field”, including the cost and time of MTEL. | DESE acknowledges the costs associated with becoming a teacher and will continue to consider the financial burden in terms of its impact on the workforce. This includes efforts to provide additional vouchers or MTEL support services to candidates in need, keeping licensure fees low, and pursuing additional resources to reduce this as a barrier to becoming an educator. |
| **General Appreciation** | * Support from an Educator Preparation Faculty/Administrator who thanks Commissioner Riley for his continued support. * Support from multiple teachers/instructional coaches who believes that alternative assessments are “long overdue”. * Support from an Educator Preparation Faculty/Administrator who is “in full agreement”. * Mixed support from an educational consultant who says, “The Amendment to pilot alternative assessments is excellent. The rationale is not.” * Support from a school administrator who offers “complete support” to the amendment. * Support from a school administrator who is “not sure if these steps are enough, but I am pleased to see the department at least addressing this issue.” | No change: The Department proposes no substantive change to the regulations related to this group of comments. |
| **Concern with Lowering Standards** | * Concern from an Educator Preparation Faculty/Administrator that “any narrowly defined exception to a universal MTEL requirement is quickly viewed as a \*default\* new method that should be available to everybody.” * Concerns from a district administrator that the alternative assessments do not address PK-12 education pipeline and merely provides a post-college loop hole. * Concern from a teacher/instructional coach for unintended consequences of questioning the qualifications of a person’s license. * Concern from a teacher/instructional coach about competition within ESL teachers on waivers. * Concern from a teacher/instructional coach and a community member about the teaching profession as compared with the standards of lawyers, doctors, and nurses who pass exams to show proficiency. * Concern from a parent/community member that “This would lead to many unqualified teachers”. * Concern from a retired teacher that “Certified is not necessarily Qualified”. * Concern from a retired principal and teacher/instructional coach about lowering standards. * Concern from a teacher/instructional coach that “increasing diversity cannot come at the cost of lowering standards”. | No change: The Department proposes no substantive change to the regulations related to this group of comments.  DESE is pursuing this amendment given evidence that suggests there are educators well-serving students by other objective outcome measures that have not been able to demonstrate that competency on the MTEL. This amendment is about finding other ways to allow educators to demonstrate the competencies, not lowering expectations.  The evaluation of the pilots included in the amendment assesses the relative and absolute standards for individual pilots. More information will be available at the conclusion of the pilot period. |
| **Expand to Additional Roles** | * Massachusetts Teachers Association “proposes modified regulatory language that allows all license categories to be eligible for future pilot programs”, particularly specialist teachers, professional support personnel, and administrators. * AFT Massachusetts suggests expanding paraprofessional-to-teacher pipelines. * Support from a school administrator who was not able to hire a talented teacher who could not pass the test as the district did not want to apply for a waiver. | No change: The Department proposes no change to the regulations related to this group of comments.  The amendment language allows for alternative assessments pilots to include the varying roles licensed in these Regulations. |
| **Expand to Support ELL Educators** | * Support from a district administrator who has lost “outstanding and diverse educators each year because of an MTEL that is assessing them in a language that they do not teach in”. Cites DESE’s relationship with Spain and requests: “1) to accept the MA bilingual endorsement (new DESE endorsement from last year) plus teaching license from a Spanish speaking country or US territory as MTEL replacement; 2) require these teachers to pass an MTEL (or equivalent) in Spanish” * Support from a teacher/instructional coach who believes that the current path is very difficult for non-native English speakers. * Support from a district administrator to strengthen dual language and transitional bilingual education programs. * Support from a district administrator who believes that “It is discriminatory to set up excessive barriers to gain licensure” as it related to bilingual educators. | No change: The Department proposes no change to the regulations related to this group of comments.  In response to prior, similar feedback, the Department also recently updated testing conditions to allow individuals for whom English is not their primary language as much time as needed when taking the MTELs.  With this feedback in mind, the Department will continue to identify and support possible alternative assessments to pilot. |
| **Expand to Support Vocational Teachers** | * Massachusetts Teachers Association requests that “Any pilot option that includes an alternative assessment for a Communications and Literacy Skills MTEL should also be applicable for vocational technical license applications issued under 603 CMR 4.00.” * Support from a district administrator who is concerned about an expected shortage of vocational teachers. | No change: The Department proposes no change to the regulations related to this group of comments.  Based on the results from this pilot, we can explore opportunities for vocational licenses. At this point the focus is our largest group of educator roles. |
| **Expand to Support International Teachers** | * Support from a school administrator who wants “an easy way for international candidates who taught in another country, such as India, for example, to be able to transfer their credential here easily.” | No change: The Department proposes no change to the regulations related to this group of comments.  Based on this pilot, we will continue to explore expanding the opportunities for out-of-state and international teachers. |