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March 9, 2020

Jeffrey C. Riley, Commissioner

Department of Elementary and Secondary Education 75 Pleasant Street

Malden, MA 02148 Dear Mr. Riley:

On behalf of AFT Massachusetts (AFT MA), thank you for the opportunity to comment on the proposed amendment to 603 CMR 7.00, which would create opportunities to pilot alternative assessments for licensure. Our comments will also address the three potential assessment alternatives identified by the Department of Elementary and Secondary Education (DESE).

We strongly support DESE's stated goal of increasing diversity among the Massachusetts educator workforce, and we are pleased that DESE is taking a close look at this issue. As such, we support the proposed amendment to pilot alternatives to the MTEL exams, which can serve as barriers to promising candidates entering the teaching profession, particularly candidates of color and individuals for whom English is not their first language.

We also urge you to consider strategies for diversifying the workforce beyond this amendment. For example, some promising avenues not addressed by the proposed regulatory change include expanding paraprofessional-to-teacher pipelines; lowering or eliminating MTEL fees; eliminating some MTEL tests altogether or at least modifying the tests to better reflect the knowledge and skills teachers need to be successful; creating strong teacher induction and mentoring programs; establishing student loan forgiveness programs for those who teach in Massachusetts schools for a certain number of years; and improving teacher pay and working conditions so we can retain the great teachers we do recruit and train. We look forward to exploring these and other strategies with you and DESE staff.

As for the three potential MTEL alternatives identified by DESE, we offer the following specific feedback:

**Proposal 2 Has Promise and Should be Piloted**

Proposal **#2-Endorsement by Approved Educator Preparation Program Providers-is** by far the most promising idea of the three. Under this proposal, approved providers, such as colleges and universities, could attest to candidates' subject-matter knowledge in lieu of these candidates passing the applicable MTEL subject matter tests.

This path has the most potential to deliver on the three criteria by which these pilots should be judged: quality, feasibility, and flexibility.

In terms of quality, this path maintains a high bar for entry into the profession in that candidates would still have to take and pass rigorous courses in content and pedagogy from carefully vetted providers to earn a teaching license from the state.

In terms of feasibility, approved providers such as colleges and universities are well positioned through the courses and assessments they already offer, and through the in-house content expertise they possess, to assess subject-matter knowledge.

In terms of flexibility, this path creates an authentic way for candidates to demonstrate their knowledge, skills, and abilities, allowing them to stay on their preparation path until they're ready to show proficiency. This addresses one of the main problems with the current approach in which many candidates are forced to take the MTELs before they've had the necessary coursework and training, leading to MTEL failure and program attrition.

We encourage DESE to pilot this alternative, and we look forward to working with DESE and the approved provider community (e.g., colleges and universities) to flesh out the details.

# Proposal 1 Is Problematic and Needs More Thought

In contrast to the promising idea above, Proposal **#I-Expansion of the Perforniance Review Program for Initial Licensure** (PRPIL)-raises serious concerns. Under this proposal, DESE would solicit third-party vendors to assess and attest to candidates' subject-matter knowledge in lieu of the MTEL.

The proposal lacks the necessary details to provide assurances that it would deliver on quality and feasibility. For example, what third-party vendors currently have the expertise and capacity to conduct these subject-matter-knowledge assessments? How would DESE assure these vendors are qualified to do this work? And could a candidate's completion of this path mean that a person could earn a teaching license from DESE by only completing the bare minimum pedagogy training currently required by the PRPIL/Class Measures route (120 hours) and taking no content courses? Or perhaps there would be no pedagogy or content course/training requirements at all depending on the vendor(s) chosen?

Such a "wild wild west" approach to teacher certification could lead to a dramatic lowering of the bar for entry into the profession, creating a two-tiered teacher workforce (those traditionally trained at colleges and universities vs. those who enter through a side route with minimal coursework or training).

This proposal needs more thought and deliberation before it is piloted, and we urge DESE to bring stakeholders together to determine if this path can be done in a way that makes sense and upholds quality.

# Proposal 3 Would Make Little Difference One Way or the Other; DESE Should Consider a "Menu of Options" Approach Similar to the SEI Endorsement

The third proposal-Acceptance **of Praxis** Core--would enable DESE to accept either the existing Communications and Literacy (C&L) MTEL or the Praxis Core test (used in other states) as a measure of the communications and literacy skills required for licensure.

We have a hard time understanding how this proposal would advance the stated goal of diversifying the educator workforce. Both the C&L MTEL and the Praxis Core have disparate pass rates by race, ethnicity, and first-language status. Therefore, this proposal simply substitutes one problematic test for another.

A better idea might be to look at developing alternative methods for demonstrating the standards (knowledge and skills) embedded in the C&L MTEL. This precedent already exists with the SEI Endorsement whereby educators can demonstrate mastery of the underlying SEI Endorsement standards in a number of ways: through educator preparation programs; through a DESE­ approved RETELL course; through a transcript review; and through the SEI MTEL. We would welcome the opportunity to work with stakeholders to see if a similar "menu of options" could be developed for the C&L requirement as it is outlined in statute.

Thank you for considering these comments, and we look forward to working with DESE on these and other initiatives to increase the diversity of our educator workforce.

Sincerely,

Beth Kontos

President, AFT Massachusetts

**cc:**

Helene Bettencourt, DESE Meagan Comb, DESE Brian Devine, DESE Heather Peske, DESE

MA Teachers Association logo 

March 13, 2020

To: Office of Educator Effectiveness

Massachusetts Department of Elementary and Secondary Education

From: Merrie Najimy, MTA President Max Page, MTA Vice President

Subject: Public Comment on Proposed Amendments to Regulations 603 CMR 7.00

The Massachusetts Teachers Association supports the efforts of the Department of Elementary and Secondary Education to explore alternative ways for educators to meet Massachusetts’ educator licensure standards. Allowing only one way to demonstrate that a candidate has met a standard – a passing score on a MTEL assessment that has predictable differential passing rates by demographic characteristics of the candidates – creates a substantial barrier to building a diverse teaching force in Massachusetts. The lack of diversity in the Massachusetts teaching force has become a significant issue in the past few years as the percentage of students of color has increased while the low diversity rate among teachers has remained low.

MTA members believe that all students benefit from diverse teachers and we support initiatives that develop options for MTEL assessments that would ensure that educators meet the standards for licensure in Massachusetts and provide candidates with a fair and reasonable way to demonstrate these standards have been met.

Proposed Amendment to 603 CMR 7.00

The proposed amendment, which would allow the Department of Elementary and Secondary Education to pilot assessment options, is an important first step in establishing alternate ways a candidate may demonstrate the knowledge and skills required to obtain a license in Massachusetts. MTA offers the following comments on the proposed changes and suggests alternatives below.

1. The proposed regulation would limit the eligibility of educators who could participate in the pilot options to those educators who hold an Academic Teacher license. Educators who are seeking licenses in other categories – specialist teachers, professional support personnel and administrators – have the same assessment requirements and are excluded from participating in the pilot. The MTA proposes modified regulatory language that allows all license categories to be eligible for future pilot programs.
2. Vocational educators also are required to pass the Communications and Literacy Skills assessment to obtain a vocational educator license. 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.
3. The MTA is recommending 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.

***(e) Alternative Assessment Pilot***

*The Department may conduct a pilot of alternative assessments identified or developed to satisfy the Communication and Literacy Skills and subject matter knowledge requirements for all license categories issued under 603 CMR 7.00 ~~04 (2)~~ ~~(a) (2) and (3), and 603 CMR 7.04 (2) (b) (2) and (3), and 603 CMR 1.06 (4) (a)~~ and 603*

*CMR 4.00. 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.~~ An alternative assessment pilot program shall not exceed a period of three years the Department of Elementary and Secondary Education approves an extension. Any candidate who passes an alternative assessment during a pilot period will be deemed to have satisfied the requirements. ~~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 participating in the pilot of the alternative assessments, ~~any evaluative information regarding these candidates~~, patterns of employment, and feedback from participants, 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.~~ The data reported to the Board shall be used to inform future pilot programs and future amendments to regulations.*

Comments on Proposed Pilot Programs

1. Expansion of the Performance Review Program for Initial Licensure (PRPIL) Route

The Department has proposed the development of an alternative assessment for educator licensure that will substitute a newly designed performance assessment pathway for the subject matter MTEL(s). This proposed option would be open only to educators who have been employed under a waiver for multiple years and who are unable to achieve a passing score on a subject matter MTEL exam. MTA believes this option needs substantial discussion and modification to determine if it is likely to have any meaningful impact. As proposed, this option appears to have little potential to increase the diversity of educations in the classroom or reduce barriers to licensure for current licensure candidates.

The proposal limits eligibility for the performance assessment to educations who have been teaching under a waiver for multiple years. The relatively few numbers of educators employed under second- or third-year waivers suggests that a small number of candidates will be eligible for such a PRPIL pathway.

In 2017-18, approximately 1161 waivers were issued to districts to allow an unlicensed educator to be employed according to data provided by the Department. Approximately 661 waivers were first- year applications and 500 were waivers issued to educators in second or subsequent years of employment. It is unknown how many individuals received waivers due to failure to meet the MTEL cut score.

As an alternative to the proposed pilot, the MTA supports the development of a performance or panel review option for all candidates for licensure who are not able to obtain the minimum score on one or more MTEL exams. Any such pathway should not be limited to educators who are working under a waiver. The Department can utilize the existing frameworks for evaluating candidates for licensure in areas where there are no MTEL exams. These include the options under the Competency Review Guidelines and the Panel Review pathways. A pilot program that allows candidates who below the cut score on a subject matter MTEL would then be eligible for an individual review of the

candidates’ evidence of coursework and/or performance based professional experience related to the content knowledge. This pilot could be focused on paraprofessionals who have successful experience in classrooms.

1. Endorsement by Approved Educator Preparation Program Providers

The MTA generally supports the development of an educator preparation program endorsement pathway to satisfy the subject matter MTEL requirements. The proposed framework of this pathway has promise but there are many details that need to be finalized with educator preparation program candidates, faculty and stakeholders. This pathway must also include intentional planning to address the structural inequalities for diverse candidates.

This proposed endorsement option is similar to the Department’s current practice that allows approved educator preparation programs to approve coverage of the Competency Review requirements in fields where there are no MTELS and verify the Additional Requirements for generalist and special education licenses. There is no further review required by the Office of Educator Licensure.

Several MTA members expressed concern that this pathway would create more costly coursework, fees and other financial burdens for candidates enrolled in programs. Such an endorsement should be at no additional cost to the candidate who participates in program.

1. Acceptance of Praxis Core

The MTA supports the proposed pilot to accept the Praxis Core assessment as the equivalent to the Communications and Literacy MTEL. For out-of-state candidates for licensure, recognizing the Praxis Core as satisfying the Communications and Literacy Skills assessment requirement only makes sense. The MTA recommends that this pilot of accepting Praxis Core be open to all applicants for any Massachusetts license that includes a Communications and Literacy Skills Assessment requirement.

For Massachusetts candidates who are seeking to substitute the Praxis Core in lieu of the MTEL exam, the Department must establish cut scores to align with neighboring states that use the Praxis exams. Massachusetts should also clarify if candidates will be required to also meet a cut score on the Mathematics subtest. There is no mathematics component required under Massachusetts statute for the Communications and Literacy assessment.

While the MTA supports the Praxis Core option, research shows that the Praxis Core has even greater gaps in passing rates for diverse candidates than does the MTEL Communications and Literacy test.

The MTA recommends that the DESE seek to provide alternatives to a standardized test of

candidate’s communications and literacy skills for all license fields and stages. The current

requirements for educators to hold a bachelor’s degree as well as document passing scores in related coursework or content-area MTELs should demonstrate that candidates have the basic skills to read and write effectively.

The MTA recommends the identification of performance measures or a specially designed course that could serve as a performance-based assessment of the required Communication and Literacy Skills as an alternative to the MTEL test. The Department currently allows a candidate for the Sheltered English Immersion Endorsement to satisfy the requirements for the endorsement through multiple measures, included a course or evaluation of a candidate’s transcripts to determine that the coverage of the content and skills listed in the regulations.

In addition to the comments above on the proposed pilots, the MTA believes that broader alternatives should be piloted. For example, a possible pilot would allow the Department to issue licenses for candidates who have met all the requirements other than the Communications and Literacy MTEL requirement to determine if the waiving of this MTEL increases educator diversity and removes an unnecessary and unfair barrier to becoming a teacher in Massachusetts.

# Response to Proposed Amendment: Educator Licensure and Preparation Program Approval Regulations, 603 CMR 7.00 – Alternative Assessment Pilot

**Sponsoring Organization:** Salem State University, School of Education

# MA DESE Memorandum on the Topic:

h [ttp://www.doe.mass.edu/bese/docs/fy2020/2020-01/item3.docx](http://www.doe.mass.edu/bese/docs/fy2020/2020-01/item3.docx)

On behalf of the School of Education at Salem State University, we submit this response to the “Proposed Amendment: Educator Licensure and Preparation Program Approval Regulations, 603 CMR 7.00 – Alternative Assessment Pilot” described in the memo issued January 17, 2020 by DESE.

Salem State University is one of the most racially diverse institutions in the Commonwealth, matriculating 29% students of color. In the School of Education, 14% of our majors are students of color, but only about 40% of those are pursuing teacher licensure. As a sponsoring organization, we have a most diverse faculty and continue to work hard to understand how to address these issues. We have a major stake in the outcome of this proposal and are eager to see it move forward successfully.

Because this proposal represents potential relief on this issue, we respectfully and enthusiastically submit this collective response in two parts:

1. Our comments on content of the memo
2. Our responses to the “Attachment 1 – Draft Alternative Assessments for Pilot Consideration” item #2 “Endorsement by Approved Educator Preparation Program Providers” and item #3 “Acceptance of [P raxis Core](https://www.ets.org/praxis/about/core/)”

# PART I. Response to Memo Content

The recent proposal to pilot MTEL waivers makes three assertions in the cover memo that we would like to respond to:

1. STATEMENT: “The MTEL is a strong tool to assess subject matter knowledge…” RESPONSE: We agree that it is ***a*** strong tool. However:
   1. There is an argument to be made that the tests are built upon SMKs that are themselves centered in American English and Whiteness in ways that do not reflect the *funds of knowledge* (knowledge that is grounded in students’ experiences in the worlds they inhabit outside of school) (Gonzalez & Moll, 2001), that the 40% pupils of color across the state bring to the classroom. As was

acknowledged in the memo, the schooling experiences of our pupils of color impact their interest in the field.

* 1. The test requirement also acts as a barrier to socioeconomically disadvantaged teacher candidates of all ethnic groups. The costs of repeating the standardized test continues to be a barrier that is not addressed in this proposal. 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.
  2. There are operational gaps between changes in knowledge in the field and test updates (e.g., Physical Education, History) that disadvantage teacher candidates in particular licenses.

We appreciate that our state leadership understands that the MTELs are only one of multiple possible ways that candidates’ knowledge can be assessed. We hope the state will take a closer look at the points above that continue to be barriers in other ways that are not addressed in the proposal.

1. STATEMENT: “...we will continue using it as the main assessment to measure licensure candidates’ content knowledge.”

RESPONSE:

* 1. A commitment to continue using a standardized test as a main assessment for teacher knowledge may interfere with the state’s goal of recruiting the intended recipients of this proposal. Well-researched studies on *self-efficacy* (a person’s belief in their ability to perform well and correspondingly how the relative strength of self-efficacy can affect performance) as well as research on *stereotype threat* (the anxiety that one’s performance may confirm a negative stereotype about one’s group) help us understand that the **requirement alone** can be enough of a deterrent for some students of color to consider not pursuing teacher licensure [(see Bandura, 1982, 1997;](https://www.zotero.org/google-docs/?l927oX) Petchauer, 2012; [Steele & Aronson, 1995)](https://www.zotero.org/google-docs/?l927oX).
  2. 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.

We appreciate that the state is advancing this proposal for piloting and testing as a way of decentering testing as the sole mechanism for ensuring teacher content knowledge. It is our hope 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.

1. STATEMENT: “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.”

RESPONSE:

As acknowledged in the memo, 92 percent of teachers across the Commonwealth are White. Given this and the points we raise above about the potential barriers to entry for teachers of color, we wonder whether this conclusion may reflect *confirmation bias* (a persistent faith in one’s prior or existing beliefs even when they may be challenged by new evidence).

After 10 years of reform, the multiple modes of instruction and multiple demonstrative assessments that have been embedded in our programs allows for a robust method of triangulating teacher candidates’ efficacy and knowledge. It is our hope that successful candidates of color who are endorsed through this pilot will open new avenues for understanding and creating new measures of effectiveness.

# PART 2. Response to “Attachment 1 – Draft Alternative Assessments for Pilot Consideration”

**RESPONSE TO ITEM 2, “ Endorsement by Approved Educator Preparation Program Providers”**

We support this proposal to permit Sponsoring Organizations to endorse candidates who demonstrate subject matter knowledge by passing the relevant content MTEL(s) OR by utilizing an alternative method of assessment. However, there are important issues regarding the proposal’s potential impact on students of color and structural implementation that we would like the state to consider carefully.

*Potential impact on students of color.*

Our concerns about the way this pilot would be communicated and the implications of how that is accomplished are two-fold: impact on students of color and on the larger teacher preparation programs. In order to reach enough students of color to have an impact on recruitment, the communication needs to be broad, direct, and given verbally and in writing to a myriad of stakeholders--including and especially those in high school settings. In the current political climate, communicating that the goals of this pilot are to help increase the racial diversity of the teacher workforce might have the effect of White students coming to resent their colleagues of color, or creating a “second class” of teacher candidates. Therefore, we need to consider: *How is this being framed to students in teacher preparation programs?* This includes qualifications and articulating the priority

criteria for the alternative assessment method. This policy communication must be framed from an *asset orientation*, which focuses on students’ resources and potential, and not a *deficit orientation*, which focuses on students’ educational challenges and gaps (Shapiro & MacDonald, 2017), to be effective.

It is our understanding that the state has suggested requiring candidates to take the MTEL twice prior to being allowed to progress to endorsement based on the alternative assessment. If that is the way that this pilot is established, then there is a critical need to consider the ways that self-efficacy and stereotype threat are at the root of the anxiety we are currently observing among students of color/multilingual students on the pathway for teacher licensure regarding MTELs. Specifically, it will require institutions to convince students that the requirement to take the MTELs twice before being considered for a waiver is still not a barrier to entering the field. This is especially true if sponsoring organizations utilize other elements (e.g., field performance or GPA) which can mask and further reinforce the divisions we seek to reduce (e.g., intersections of socioeconomic status or social capital of first generation college students).

Thus, we would caution the state and our sister schools from developing “extra hoops” students would need to pass through as an alternative assessment. This potential “false equivalency” could interfere with the outcomes of the pilot. Internally, we have discussed and outlined a potential solution to manage this operationally, but there are other complicating factors we urge the state to consider as it communicates this pilot to the broader public.

*Structural concerns and considerations.*

We fully support giving the Deans of the sponsoring organizations latitude in determining who may be endorsed utilizing the alternative assessment method. However, it is our belief that having the state provide explicit guidance and recommendations for areas of need--either by license or specifying the protected groups that qualify as helping to diversify the teaching force--is essential to the pilot’s success. The power of state mandate is undeniable in advancing many of the recent requirements referenced in the proposal (e.g., gateway assessments).

In addition, it is our understanding that the state has suggested permitting a maximum of 20% of candidates to be endorsed using the alternative assessment per sponsoring organization. If SSU’s teacher licensure programs were to reflect the institution’s diversity (29%), we would exceed that maximum and be forced to find other ways to “qualify” candidates (e.g., licensure needs). Therefore, we would recommend that SO’s

maximums begin at 20% as a baseline with increased amounts if they are supporting higher percentage of students of color.

Finally, we recommend that the state convene a group of stakeholders to determine what the audit process for this pilot would look like. It is our understanding that data submitted to the state from a range of sponsoring organizations does not fully reflect all students who considered teacher licensure, but primarily eliminates students who changed plans prior to entering the advanced stages of the programs. This makes it extremely difficult to answer the question: *If this policy had been in place 3 years ago, which students and sponsoring organizations would have been affected by this alternative assessment process?* SSU is currently working on a project to determine the answer. We recommend that the state work with a sample of institutions to examine this and other issues, and not rely purely on state-level measures to determine the outcomes of the pilot.

# RESPONSE TO ITEM 3, “Acceptance of [Praxis Core](https://www.ets.org/praxis/about/core/)”

We support accepting the Praxis Core in lieu of the Communication & Literacy MTELs. However, the state must acknowledge that this proposal does little to address the goals stated in the memo of increasing the racial diversity of the teacher pipeline as the Praxis has similar, if not wider, racial performance disparities (Petchauer, 2012).

Further, this proposal does not address the Communication and Literacy portions of the MTEL requirements which continue to be a barrier for our first generation and generation

1.5 multilingual students. We recommend that data be collected as part of this assessment, asking for students to indicate whether they are multilingual and having them select the languages and levels of proficiency as part of the examination, so that the state can study this unaddressed issue further.

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