The Department received 201 (120 full responses / 81 partial submissions) responses to the survey used to collect public comment. In addition, we received emails with PDF attachments from the MTA and AFT-MA. Please see link [here](https://reporting.alchemer.com/r/72307_63ea6930b4e303.40165202) to the summary report from the public comment survey.

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

|  |  |
| --- | --- |
| **Organizations/Groups** | **Individuals** |
| * American Federation of Teachers (AFT) - Massachusetts
* Massachusetts Teachers Association (MTA)
* Massachusetts School Administrators’ Association (MSAA)
* UMass-Boston (Ed Admin)
* Norton Public Schools
 | * 200 (80 partial responses) individuals submitted:
	+ 37.9%: Teacher/Instructional Coach
	+ 18.5%: District Administrator
	+ 17.4%: Other
	+ 16.4%: School Administrator
	+ 16.4%: Educator Preparation Faculty/Administrator
	+ 11.3%: Parent/Community Member
	+ 2.1%: 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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| Extension of the Pilot of Alternative Assessments for Licensure, 7.04 | * **76% support / 14% support with edits**
* From AFT-MA: We support the extension of the Pilot of Alternative MTEL Assessments….Overall, we see the Preparation Program Attestation option – implemented by colleges and universities – as one of the most promising pathways in the long term, and we urge DESE to continue its investment in that route.
* From the MTA: The MTA supports the continued extension of the MTEL Alternative Pilot program. Furthermore, the Department should not delay the permanent adoption of MTEL alternatives until the end of the pilot. The MTA urges the Department to consider that only test-based options for the Communications and Literacy assessment portion are available under the pilot program. We urge the Department to identify performance assessments, transcript evaluations or other non-test options to demonstrate the objectives covered in this test.
 |  Keep proposed amendmentWe will continue to promote the development of alternative assessments with our approved educator preparation programs.  |
| Eligibility to use an approved alternative assessment, prior to October 20, 2020, 7.04 | * **79% support / 9% support with edits**
 | Keep proposed amendment |
| New Provisional Principal/Assistant Principal License, 7.09 | * **79% support / 7% support with edits**
* From AFT-MA: we support the concept of creating a new provisional license for principals/assistant principals. This would create a parallel structure to teacher licenses, which also offer a provisional route, and hopefully help ease shortages in the school leader ranks. However, we have deep concerns about the part of your proposal that would eliminate the PAL for candidates earning the proposed new license…..we urge you to make modifications to this proposal, including one or more of the following: 1) Limit this new provisional license to candidates who have at least three years of direct educational experience—i.e., those with “executive management/leadership” experience but no teaching/educational experience should be ineligible for the provisional license. 2) Shorten the duration of this license to three years or less. One to three years should give candidates plenty of time to complete the PAL before advancing to the Initial license. 3) Eliminate the district internship route to the provisional license as it provides no external check as presently constructed. Alternatively, DESE could “beef up” the district internship route by issuing guidelines that require a consistent process, work product, and performance assessment across districts.
* From MTA: The MTA is concerned about a proposal for a Principal/Assistant Principal license that will allow five years of administrative and supervisory employment. Superintendents and principals who are seeking to fill administrative positions where a license is required have the option to apply for a Hardship Waiver2. Employment under the 1 See 7009-6601 malegislature.gov/Laws/SessionLaws/Acts/2022/Chapter126 2 603 CMR 7.15 Hardship Waivers and Critical Shortage. (a) The Commissioner may exempt a district for any one school year from the requirement to employ licensed or certified personnel in accordance with M. G. L. c. 71 § 38G. The Commissioner may deem a district to have a great hardship in securing licensed or certified personnel for the purposes of M. G. L. c. 71 § 38G upon request of a superintendent and demonstration to the Commissioner that the district has made a good-faith effort to hire licensed or certified personnel, and has been unable to find a licensed or certified candidate who is qualified for the Hardship Waiver will allow legal employment in an administrative role while allowing the candidate for licensure additional time to complete foundational requirements for administrative licensure. The proposed regulatory language does anticipate the completion of a preparation program, a panel review or an internship in the role of the license. The MTA recommends excluding the internship in the role of the license as an eligible pathway due to the lack of external demonstration of proficiency in the Professional Standards for Administrative Leadership under 603 CMR 7.10. The MTA recommends further limiting eligibility for the Panel Review option for the Provisional license to candidates who already hold a valid educator license. The MTA recommends the following limitations to eligibility for any Provisional Principal/Assistant Principal license: • Limit eligibility only to candidates who have completed an approved preparation program or completed the Panel Review option • Shorten the employment eligibility to five calendar years rather than “ five years of employment” to encourage timely completion of the Performance Assessment for Leaders (PAL) • Include a prerequisite of seminars or courses on evaluating and developing educators or completion of the relevant portion of the performance assessment.
* I think there should be some type of requirement other than UG degree and MTELs. Perhaps some competencies, teaching experience, or partial completion of an ed prep program.
* Experience/on the job training should count as performance assessments for new principals instead of the tedious and inapplicable to real school leadership, MAPals. Or there should be other assessment/evaluations accepted considering the different hierarchy of charter schools/non traditional school settings.
* There were several individuals that shared concern about the Provisional license with sentiments similar to the following:
	+ Many of the new principals are ill-prepared for the role of instructional leader and this will only worsen the issue, and
	+ The performance assessment is crucial. If it is not producing excellent admin, then change the program - don't drop it.
* Public comment regarding proposal Provisional license for principals from Massachusetts School Administrators Association (MSAA) Please accept this letter of support from the Massachusetts School Administrators Association (MSAA) regarding the opportunity for a Provisional license for principals. The MSAA is the institution that provides the support and resources to our PreK – 12 school leadership membership. On a daily basis, school administrators across the Commonwealth reach out to our offices. They inquire about the lack of qualified potential administrators to fill vacant positions. They communicate about the lack of incentive to enter into school administration. We receive multiple inquiries from current school administrators that are seeking to leave the role of building principal. These inquiries far outnumber individuals that are looking to enter the world of school administration. We truly appreciate our ability to speak with and have productive conversation with the Commissioner. This fall at a regularly scheduled meeting between the Commissioner and the MSAA Officers, we collectively communicated these concerns regarding the principal pipeline. We commend the Department's swift action to support districts that are facing staffing challenges. Creating an option for Principals/Assistant Principals to earn the Provisional license based on completion of certain preparation requirements, but prior to completing the Performance Assessment for Licensure (PAL) would allow candidates more time to meet the requirements for PAL while working in the role. We have been speaking with and having productive conversations with our partners at both the Department of Elementary and Secondary Education (DESE) and the Massachusetts Association of School Superintendents (MASS). We have communicated with them our comprehensive focus on and investment to "Grow Courageous Leaders." This plan begins with an Initiative where current school and district administrators identify current educators who have strong leadership qualities and following up with theses identified individuals with aspiring administrator meetings by geographical region. This proposed amendment would open up access to the role and broaden the principal pipeline. A systemic approach to provide support by expanding and enhancing induction programs to support individuals new to the role of school administration is an integral component of our overall plan. We have met a number of times with our partners at MASS and will continue to work with them in replicating a principal induction program. In closing, the MSAA strongly supports that the Board of Education vote on making a new license to create a new Provisional license for Principals and Assistant Principals to better support a pipeline into the Assistant Principal and Principal roles in our schools.
 | In alignment with all other provisional licenses issued by the Department, we will keep the five-year validity period for the provisional Principal/Assistant Principal license. If there is compelling data in the future that supports limiting this validity period, we will revisit this policy at that time.Based on public comment, we support the idea to limit access to this license given the expectation of the Principal being an Instructional leader. We have revised the prerequisite experience requirement to allow for only education experience to count towards that prerequisite experience. All candidates earning this license will be required to complete an updated performance assessment based on [revised standards and indicators for administrative leadership](https://www.doe.mass.edu/edprep/resources/guidelines-advisories/leadership-guide.pdf) during the practicum/practicum equivalent as part of the route to earn this license. |
| New Military Spouse License, 7.04 | * **66% support/ 10% support with edits**
* From AFT-MA: We support the creation of a new Military Spouse license, as required by statute. However, we would advocate for eliminating the word “spouse” from the license. “Military affiliated” license or something to that effect might be a suitable alternative.
* From the MTA: The MTA supports an expansion of the eligibility of the proposed “Military Spouse” license to be more inclusive of military service members and eligible veterans as they continue their civilian careers in education. After consultation with MTA members connected to our military communities, there was a resounding concern about using the term “Military Spouse” as the name of the license. The phrases “inherent sexism” and “diminished professional status” were used multiple times by our members. The MTA is recommending the license be a “Military Affiliated” license for educators who hold an out-of-state educator license and who have not yet completed the Massachusetts-specific requirements for educator licensure. The MTA also recommends the Department includes eligible military service members and eligible veterans (and their spouse) as eligible for the Military Affiliated license. The same pre-requisite requirements would apply and would recognize eligible service members who have relocated to Massachusetts or neighboring states with the same benefits recognized for their spouses.
* I'm not opposed to the idea of the military spouse license but I would rather not have a separate category for one small subgroup and just make it easier for all out of state licensees to transfer licenses. This seems to create an extra layer of complications in the already complex process.
* A military spouse license is needed. I am a military spouse and hold teaching licenses/certifications in California, Virginia, and Massachusetts. The years I spent teaching in California and Virginia before moving to Massachusetts prepared me to teach here on day one. Military spouses should not be required to meet the same requirements as new teachers. If the military spouse has an active license from other states and experience, he/she should be able to start teaching right away.
* I do NOT agree that a military spouse license should be created. My husband is in the criminal justice field, but being his spouse does not make me qualified to do his job. I have not gone through any criminal justice educational programs or academies. The same example stands for the world of education. Just because you are the spouse of someone in the field of education does NOT qualify you to hold a license to teach or be in any of the support roles. The appropriate academic programs and internships should be required in order to work with children.
 | Based on new statutory language (Acts of 2022, c. 154, sec. 10, amending G.L. c. 71, sec. 38G), keep language of Military Spouse in alignment with this new law. |
| New Option for out-of-state candidates to meet the Sheltered English Immersion endorsement requirements, 7.14 | * **73% support / 17% support with edits**
* From AFT-MA: We also support a new option for out-of-state candidates to meet the Sheltered English Immersion endorsement requirement, as well as the other “housekeeping” updates to the regulations.
* From the MTA: The MTA supports the proposed amendment to 603 CMR 7.14(1) SEI Teacher Endorsement and 603 CMR 7.14(2) SEI Administrator Endorsement to allow the option of out-of-state credentials to satisfy the requirements for the Massachusetts SEI Endorsement.
* If a teachers has completed a similar program from another state, Massachusetts should honor it. I am a military spouse who taught in San Diego, 20 minutes from the border of Mexico. My teaching license required me to complete a 4 course program similar to the SEI endorsement. I was shocked to learn I had to take the SEI classes to teach here in Massachusetts.
* Depends on the state. Keep it rigorous. Make it more rigorous.
* Several people noted their support for the change
* Several people commented with: I agree with edits. I would encourage that states that have approved and mandated SEI requirements be provided this option only.
 | Keep proposed amendment |
| Align the program approval requirements to Guidelines for Program Approval, 7.03 | * **78% support / 11% support with edits**
* Several individuals shared: We are concerned with the change in language that removes the opportunity for verification of evidence that has been collected by the department. It is also not clear what this evidence is and thus would like more details
* Program approval should be aligned, but it programs should provide real-world application as a teacher. Teacher burnout is at an all -time high and teachers are not coming with realistic expectations.
 | Keep proposed amendment.For clarity on the alignment to Guidelines for Program Approval– please see link [here](https://www.doe.mass.edu/edprep/resources/guidelines-advisories/program-approval/) for additional information. |
| Create additional flexibilities in coursework for professional licensure, 7.04 | * **83% support / 10% support with edits**
* I want to know what the additional flexibilities for professional licensure coursework looks like, but I am in favor of it being more flexible.
* Create additional flexibilities in coursework for professional licensure- Please consider district supported portfolio as coursework for districts who want to create their own programs to support strategic plans. Clarify expectation that practicum experiences are in the licensure role- Please consider work-based practicum whereby teachers who already have a MA/MEd are able to complete hours.
 | Keep proposed amendment |
| Clarify expectation that practicum experiences are in the licensure role, 7.04 | * **86% support / 8% support with edits**
 | Keep proposed amendment |
| Combine History and Social Science into one license in alignment with the MA Curriculum Frameworks and Subject Matter Knowledge requirements, 7.04 | * **88% support / 4% support with edits**
* While I am for the combining of History and Social Sciences into one license, I have concerns. - Will it potentially eliminate those who want to teach history, but not take the necessary coursework and/or teach social sciences such as sociology or psychology? - Will it reduce interest as potential educators do not want a license that will allow a district to unexpectedly more them around and teaching multiple curriculums? - Will it require that people interested in this licensure have the appropriate coursework, and not some generic program of study?
 | Keep proposed amendmentWe don’t expect this name shift to deter people from wanting this license. The content in the Frameworks (see link [here](https://www.doe.mass.edu/frameworks/hss/2018-12.pdf)) are integrated to support this name shift. |
| Changes the name of the Foreign Language license to World Language in alignment with the MA Curriculum Frameworks, 7.04 | * **92% support / 4% support with edits**
 | Keep proposed amendment |
| Add a new PreK-6 level for the Digital Learning and Computer license in support of district needs, 7.04 | * **81% support / 11% support with edits**
* The current test is not applicable to the skills needed for this license
* I would like to see the Digital Learning and Computer Science License be PreK-8
* Amend the PK-6 Digital Literacy License as long as there is still flexibility in hiring and accepting other appropriate licenses.
* From the MTA: In 2016, the Department established the Digital Literacy and Computer Science frameworks for student learning and the Digital Literacy/Computer Science license for teachers. At the time of creation, a license was only created for the 5-12 levels with the intention that this license was primarily for teachers of computer science. In the 2016 Subject Matter Knowledge Guidelines published by the Department, “Digital Literacy” was identified as a cross-cutting subject matter area that all educator preparation programs were expected to incorporate into teacher preparation programs for Early Childhood and Elementary teacher licensure programs. Unfortunately, it does not appear there was follow through with incorporating the digital literacy subject matter knowledge requirements into teacher preparation program guidelines. Consistent with the public comments submitted by the MTA in 2016 regarding this license, the MTA recommends the license be named Computer Science for both PreK-5 and 5-12 level. The specific Computer Science license would also align the license name and role to existing legislative initiatives supporting the expansion of computer science education in Massachusetts (See 7009-6601 malegislature.gov/Laws/SessionLaws/Acts/2022/Chapter126). The creation of a Computer Science license for PreK-6 is a positive recognition of the content area knowledge and skills related to the instruction of computer science for elementary students. It is the understanding of the MTA that the Department intends to require the identical MTEL created for the 5-12 teachers of computer science for the elementary license. The MTA encourages the Department to allow either the existing MTEL or completion of a Competency Review appropriate to the grade span to satisfy the requirements for the license. This would be a similar requirement as used for the History 1-6 license and General Science 1-6 license. The MTA further recommends that the Department add a Panel Review option for the Instructional Technology specialist teacher license and the Reading Specialist teacher license to support the increasing demands for educators skilled in both instructional technology and the science of reading. The Panel Review will maintain the same high standards for subject matter knowledge and skills while allowing candidates to apply professional knowledge and experiences from outside of the limited and costly graduate programs currently available.
 | Keep proposed amendmentThere will be two assessment options for demonstrating content knowledge for the PK-6 license: a competency review or by passing the DLCS 5-12 MTEL. The levels for the license are in alignment with other split level licenses, e.g. English as a Second Language.The name of the license is in alignment with the Digital Literacy and Computer Science framework which describes subject matter knowledge requirements for this license and the content and skills a student should learn in each grade span. Our frameworks is not separated into digital literacy and computer science standards. This was the decision of the standards writing committee since there were 50% to 70% of content/practice topics in each grade band that was considered both digital literacy and computer science, and both stakeholder groups claimed ‘ownership’ of the common standards. This resulted in our combined Digital Literacy and Computer Science Framework. Although there are a range of courses from those focused on the digital literacy standards and some of the common standards to those focused on the computer science standards and some of the common standards to a mix of both options; the teacher should know and be able to teach both digital literacy and computer science, at their grade level.#7009-6601 malegislature.gov/Laws/SessionLaws/Acts/2022/Chapter126 calls for computer science recruitment, professional development, certification, and integration across content areas; analysis and report on a requirement for high schools to offer a course; and analysis and report on a high school graduation requirement. As described above courses may be digital literacy, computer science, and a blend of digital literacy and computer science. [Course List here](https://profiles.doe.mass.edu/help/DLCSCourseLookup.pdf). Our data shows that districts offer more digital literacy courses than computer science or blended digital literacy and computer science courses. The focus on increasing computer science courses would not change the subject matter knowledge requirements of the educator. And the subject matter knowledge requirements for the license are based on the DLCS Framework. |
| Remove the Performance Assessment requirement for all administrator licenses other than the Principal/Assistant Principal license, 7.09 | * **63% support / 12% support with edits**
* From the MTA: The MTA opposes the elimination of the required Performance Assessment for administrative licensure. The 2021 Guidelines for the Preparation of Administrative Leaders3 were developed and published with the understanding that candidates for administrative licenses would need to complete a Performance Assessment aligned to the role of the appropriate license.
* Admin licensure needs to be more stringent. These folks ruin schools with their incompetence. The program to license them should be more rigorous - not less. Moreover, teachers wanting to flee the classroom will not make excellent admin. Yes, we need a pipeline of excellent admin, but this is not the way.
* All performance tasks should be removed even principal and assistant principal.
 | Based on the research identifying the critical role a principal plays in improving student growth and achievement, the Department prioritized the development of the [Performance Assessment of Licensure](https://www.doe.mass.edu/pal/) that is specific to the tasks/work of a Principal. There have not been similar licensure assessments developed for the other administrator licenses.Importantly, all administrator licenses and routes to those licenses require the completion of a performance assessment during their field-based experience as outlined in the following Guideline documents (see link [here](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.doe.mass.edu%2Flicensure%2Facademic-prek12%2Fpanel-review-administrator-routes.docx&wdOrigin=BROWSELINK) and [here](https://www.doe.mass.edu/edprep/resources/guidelines-advisories/leadership-guide.pdf)).Removing this specific language does not reduce the current expectation for candidates given that there is only a Performance Assessment for Licensure for Principals/Assistant Principals. If a similar Performance Assessment for Licensure is built out for other administrator licenses, we will add this back in as a requirement for the license. |
| Combine the levels for School Counselors to have one all-level license in alignment with other Professional Support Personnel licenses, 7.11 | * **81% support / 9% support with edits**
* This will be tremendously helpful, and is already how we prepare students at UMass Boston for the most part. It may be helpful to have students experience a small # of hours as part of practicum and/or pre-practicum so that all of the experience is not at a single level. Even 15 hours goes a long way to understanding how the roles and responsibilities can differ between elementary and high school
* All level licenses can be challenging for ed prep programs because they require split level practicums. This often causes a great deal of conflict, confusion, and frustration between candidates and their programs. At FSU, we require split practicums regardless, so it won't impact us much, so this is more of a commentary on the rest of the All Level licenses.
* This is an equity issue with other licenses. Also, counselors would be credentialled to service students at all grade levels, especially if there multi-grade groupings in their schools.
* I feel that we would need to ensure that those in this position are properly educated on the various developmental stages that occur based on the age of the student. While I am for an all-level license, the program must have the coursework relevant to all the developmental and social/emotional stages. i.e. Early Childhood, adolescent, pre-teen, teen, etc.
* Too wide of a range: very specialized work at the high school level and middle school.
* As a guidance counselor who has multiple licenses and have worked at every grade level, I do NOT support once license for guidance. Someone that completed the program to work in a high school is VERY DIFFERENT than the role of a guidance counselor at the elementary level, and vice versa. You would not expect the physics teacher to go teach first grade or the first grade teacher to go to teach physics. School guidance licenses should be respected the same way. The only way around it would be to require an additional internship at the other age level. The role of guidance counselor is very different at the elementary level vs. high school and having some type of experience in both roles should be part of the program if the candidate is going to receive a license to work at that level.
* There were several comments noting their support for this change
* Several people noted a similar sentiment to the following: Ensure that current counselors can have access to the all-level license.
 | Keep proposed amendmentThis level change is in alignment with other Professional Support Personnel licenses. This new all level license will not require a split-level practicum. All candidates earning a School Counselor license will have met the subject matter knowledge requirements outlined in Guidelines, see link [here](https://www.doe.mass.edu/edprep/domains/instruction/smk-guidelines.docx). |