Summary of Public Comments on Proposed Changes to the Regulations for Educator Licensure and Preparation Program Approval

# Introduction

The Massachusetts Department of Elementary and Secondary Education (Department) invited public feedback on proposed changes to the state’s Regulations for Educator Licensure and Preparation Program Approval (603 CMR 7.00) from February 26 to April 4, 2025. During this period, the Department received a total of 9 comments via email and 89 comments through a dedicated public comment survey tool. Redacted versions of all survey responses and emails are available upon request.

Among the 89 comments submitted through the survey tool, 8 came from individuals representing their school, district, or organization, while 81 were submitted by individuals on their own behalf. The breakdown of comments by role is as follows (respondents were able to select multiple roles):

* 5% from district administrators
* 3% from members of advocacy organizations
* 13% from parents and community members
* 2% from school administrators
* 3% from students
* 53% from teachers
* 20% from individuals identifying as “other”

All comments, with personal data redacted as required, are available upon request.

For the purposes of this summary, the Department has summarized the number of responses for each comment as follows: Some (1-24%), Many (25-49%), Majority (50-74%), or Most (75-100%).

# Summary of Public Comment

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| **Summary of Public Comment Themes and Department Response** |  |
| **Public Comment Received** | **Department’s Response** |
| **7.03 Permanent authorization of Alternative Licensure Assessments** | |
| Commenters overall support permanently authorizing alternative assessments for licensure to ensure an equitable and accessible educator workforce and licensure system (most individuals and organizations, including MTA, AFT, Latinos for Education, Bridgewater State University, MABE). |  |
| Expand access of alternative licensure assessments to those licensed under 603 CMR 4.00, Vocational Technical Education (MTA) | No changes. We will take this into consideration and explore this with internal and external stakeholders. |
| Consider additional guardrails and conditions for implementation of the alternative assessments (MBAE) | No changes. If the proposed amendments are adopted, DESE plans to issue guidance that will consider these public comments and will have another open public comment period when the implementation guidelines are released. |
| Consider the inclusion of statutory language from the LEADS act re: alternative licensure pathways that may waive one of the two MTELS required for licensure and expand annual reporting (Latinos for Education) | No changes. It is premature to introduce this statutory language.  The Department will bring proposed regulations in response to the language in the LEADS act at a later date following internal and external stakeholder engagement and recommendation by the Commissioner of Elementary and Secondary Education. We will be including race/ethnicity results in the annual reporting of alternative assessments as we currently do for all MTELs when the n size is 10 or higher. |
| Increase the number, type and availability of alternative licensure assessments (some individuals) | No changes. If the proposed amendments are adopted, DESE plans to issue guidance covering this topic. |
| **7.04 Additional flexibility in coursework requirements for professional licensure** | |
| Support creating additional flexibilities and allowing up to six of the 12 credits to include the Professional Standards for Teachers (most individuals, MTA). |  |
| **7.04 Name and Level change for Health/Family and Consumer Sciences, all levels license to Comprehensive Health, PreK-8 & 5-12** | |
| Commenters overall support changing the name and levels for license to clarify the role of health educators (majority of individual, MTA, Bridgewater State University). |  |
| I agree with the name change, but not separating the grade spans (one individual) | No changes. The split levels better align with the physical education license and the content requirements in the updated framework.  The split levels also require only one 300-hour practicum at the PreK-6 or 5-12 level versus an all-level license that would require two 150-hour practicums at the elementary and the middle/high school level. |
| **7.04, 7.14 New Media Arts Endorsement** | |
| Commenters overall support creating a new Media Arts Endorsement (majority of individual commenters, Latinos for Education). |  |
| Add: the TV & Radio Broadcasting vocational license as a possible prerequisite license (a few individuals) | Revised to update the list of prerequisite vocational licenses. |
| **7.04 Allow the Bilingual Endorsement as an alternative to the Sheltered English Immersion Endorsement for initial licenses in core academic areas** | |
| Commenters overall support the addition of the Bilingual Endorsement as an alternative to the Sheltered English Immersion Endorsement (majority of individuals, Latinos for Education, MABE). |  |
| These are two very different methods of instruction. Bilingual education has advantages, however, it is NOT the same thing as SEI (one individual) | No change. Teachers would still be required to hold the endorsement that corresponds with the setting in which they teach, i.e., if a teacher is teaching in a bilingual program in a partner language, then they would be required to hold the Bilingual Education Endorsement (BEE); if a teacher is teaching in English in an SEI setting, then they would be required to hold the SEI endorsement. The proposed regulation simply means that a teacher in a bilingual setting would not be required to hold *both* the SEI and BEE endorsements. |
| **7.15 Specify that Emergency licenses may not be extended beyond June 30, 2027** | |
| Commenters overall agree that the emergency license provided the necessary temporary support during the pandemic and do not need to continue (many individuals). |  |
| Emergency licenses should continue to be extended to give people time to meet the licensure requirements (some individual) | No change. The last new emergency license was issued on November 7, 2023.  Emergency licenses are eligible for two one-year extensions; therefore, it is not necessary to allow extensions beyond June 30, 2027. The previously issued emergency licenses that began in June 2020 and were available through December 2021 cannot be extended beyond June 30, 2025. |
| **7.02 & 7.15 Remove outdated language relating to licensure flexibilities that were available during the COVID-19 pandemic (603 CMR 7.02, 7.15), transition periods from past licensure changes that are no longer relevant (603 CMR 7.15), and a Performance Assessment Program that is no longer relevant (603 CMR 7.02)** | |
| Commenters overall support the changes (majority of individuals). |  |
| The COVID-19 flexibilities are still needed to address continued emergency license and staffing challenges (some individuals) | No change. Other flexibilities (for example, alternative assessments) are available to provide pathways to educator licensure. |
| **Overall** | |
| Commenters overall support the changes (majority of individuals). |  |
| Commenters support some of the changes (some individuals). |  |

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