



June 1, 2015

Sarah Whitman  
Special Education Policy and Planning  
Department of Elementary and Secondary Education  
75 Pleasant Street  
Malden, MA 02148

Dear Ms. Whitman,

I am writing in response to Proposed Amendments to Educator Licensure Regulations 603 CMR 7.00, which will create the Massachusetts Autism Specialist Endorsement. My area of expertise and research is the preparation of teachers who work with students with autism. I have over twenty years experience in the field, beginning as a special educator working with students with autism in both public and private settings in Massachusetts, consulting for over 15 years in public school settings where students with autism are educated, and lastly, working as a faculty member in higher education since 2001, focusing specifically on teacher education. Additionally, I co- convened and led a group of educators, self-advocates and other stakeholders with Massachusetts Advocates for Children to advocate to the Massachusetts Legislature for this endorsement, based on my work over ten years focusing on autism teacher education.

I offer the following comments regarding two areas of the proposed regulations, specifically highlighting concerns in bold/italics.

#### Prerequisite License

- An Initial or Professional license as a Teacher of Students with Moderate Disabilities, Teacher of Students with Severe Disabilities, ***Early Childhood***, Teacher of the Deaf and Hard-of-Hearing, or Teacher of the Visually Impaired; or
- ***An Initial or Professional license as an Elementary Teacher or a core academic subject license.***

#### Field Experience

- ***Teachers meeting the prerequisite license requirements outlined in 603 CMR 7.14 (5) (a)(1) who can demonstrate at least one year of teaching experience working with students with autism are exempt from the field-based experience requirement.***

## Prerequisite License

### Concerns:

- *Conflation of preparation experiences.* I strongly oppose the inclusion of general education licenses in the prerequisite requirements for the autism endorsement. This represents a serious conflation of the training, experiences and knowledge that each professional possesses. **The preparation and education of special education teachers is vastly different from that of general education teachers.** General educators will have gaps in understanding and practice necessary to enact specialized autism knowledge.
- *Research on autism teacher education focuses primarily on special education teachers, not general educators.* Autism researchers have long theorized the need for special education teachers to possess specialized autism knowledge (National Research Council, 2001; Simpson, 2003; Scheuermann, Webber, Boutot & Goodwin 2003; Simpson, Mundscenk, & Heflin 2011; Henderson, 2011). **Expertise in autism is first dependent on broad, foundational knowledge of special education, including typical and atypical development.**
- *General education teachers lack foundational understanding of special education.* Currently, general education teachers, including the Early Childhood license, are not required to take a specific number of credit hours relating to students with disabilities. Prospective elementary teachers need only demonstrate competency knowledge of “characteristics and instructional implications of moderately and severely disabling conditions,” according to Massachusetts’ Subject Matter Knowledge requirements (603 CMR 7.06 [7] [c] [2b]). Similarly, a prospective early childhood educator is only required to have knowledge of the “preparation, implementation, and evaluation of Individualized Education Programs (IEPs)” (603 CMR 7.06 [7] [b] [6]). **Allowing general education teachers to add this endorsement could create serious confusion over how the knowledge is utilized in school settings, where public districts are required to comply with federal and state special education statutes.**
- *Lacks evidence.* The Individuals with Disabilities Education Act (IDEA), mandates the use of evidence-based practice to the extent practicable. **Teacher education policy must also be based on empirical evidence, not generalities or presumptions about what is good for students, in order to improve student outcomes.**

### Proposed Solutions:

- *Improve general educators’ special education knowledge in preparation programs.* Strengthening special education knowledge for general educators

would be a more appropriate and helpful step toward responding to both the significant number of students with disabilities in inclusion settings and the precipitous increase in students with autism in Massachusetts' public schools.

- *Encourage general educators' professional development in the area of autism.* The Department should consider allowing any coursework taken by a general educator to apply to advancing, extending or renewing the general education license. No teacher would be precluded from participating in professional development opportunities, certificate programs, or additional special education licensure opportunities at the University level; they would simply lack the ability to receive the state endorsement credential unless they pursued licensure in special education.

## Field Experience

### Concerns:

- *Field experiences are critical to advancing teacher knowledge.* No teacher seeking an additional credential should be exempt from the field requirements set forth in the proposed endorsement. **Teacher education scholars have long agreed that extensive, thoughtful, supervised field experiences are critical to provide teachers the opportunity to apply content from teacher education programs to practice** (Brownell, Ross, Colon, McCallum, 2003). Additionally, Wideen (1998), in a seminal work, showed that field experiences are more effective when they are explicitly connected to teacher education coursework.
- *Teachers need practice and support when new knowledge collides with previous practice and old beliefs.* **To effectively prepare autism teachers with the knowledge they need, autism teachers need carefully designed and supervised mentored field experiences, despite any educational experiences they may have previously had.** This will elevate autism knowledge within public schools.

### Proposed Solutions:

- *Allow field experiences to encompass settings not traditionally utilized in practica.* Students with autism need support across a variety of settings over the lifespan. Expanding the settings where special education teachers can participate in field experiences, including community, hospital/clinic and domestic settings. This will serve to expand teacher knowledge rather than rely on previous experiences that cannot retrospectively be evaluated for their effectiveness/robustness.

Lastly, I wish to share some of the results of my own recent research (2013), which I conducted with a pilot sample of Massachusetts special education teachers ( $n = 70$ ). These results suggest that special educators, who enter the field with broad special education knowledge, report requiring significant additional knowledge and education to feel prepared to teach students with autism:

- 100% of special education teachers indicated that specialized training, beyond their standard teacher licensure, was required to educate students with autism.
- 100% of teachers indicated they needed/had multiple years of mentoring from a veteran autism teacher following their preparation program to help them effectively educate students with autism.
- 92% of special educators indicated that they had multiple years mentoring from an autism expert (consultant) following their teacher preparation programs to help them effectively educate students with autism.

I commend the state in the creation of this endorsement as an important step in autism teacher education in the state of Massachusetts, and urge you to give this feedback serious consideration, particularly as it relates to general education licenses, as the regulations advance to the Board for a final vote.

Thank you for your commitment to improving autism teacher education in the Commonwealth.

Sincerely,



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