



May 1, 2017

To: Elizabeth Losee, Office of Educator Preparation
Massachusetts Department of Elementary and Secondary Education

From: Barbara Madeloni, MTA President
Erik J. Champy, MTA Vice President

Subject: Public Comment on Proposed Amendments to Regulations for Educator Licensure and
Preparation Program Approval 603 CMR 7.00

Attached are public comments submitted on behalf of the 110,000 members of the Massachusetts Teachers Association regarding the proposed amendments to 603 CMR 7.00. The MTA has reached out to its members to gather input on the proposed amendments through in-person meetings with educators who are impacted by these changes as well as through surveys and presentations to local associations and their representatives. MTA staff appreciate the accessibility of Department of Elementary and Secondary Education staff throughout this process.

Definitions 603 CMR 7.02

DESE-Proposed Amendments

- Adds new terms and related definitions for *guidelines* and *provisional license*.
- Alters the definitions of the terms *license*, *practicum/practicum equivalent*, *pre-practicum*, *subject matter knowledge requirements* and *temporary license*.
- Deletes the terms *preliminary license*, *regional credential*, and *regionally licensed educator*.

MTA Response

The MTA agrees with the proposed amendments to 603 CMR 7.02. The MTA would like to further recommend that DESE include in the definition of *guidelines* language that requires a period of public comment for not less than 60 days for any proposed changes to Department-issued guidelines identified under 603 CMR 7.00.

Additional MTA-Proposed Amendments

The MTA proposes the following amendments to this section:

MTA-Proposed Amendments in Blue DESE-Proposed Amendments in Red	MTA Comment
Administrative Apprenticeship /Internship	Simplify language.
Alternative Preparation Organization; Alternative within an Institution of Higher Education	Remove duplicative language. Programs that fall under these definitions may be categorized as Approved Preparation Programs.
Practicum/ Practicum Equivalent	Simplify language.

Educator Preparation Program Approval 603 CMR 7.03

DESE-Proposed Amendments

- Alters language related to the calculation of “continuous improvement” for approved educator preparation programs to require approved programs that “demonstrate continuous improvement” and require the use of “state available data.”
- Alters wording related to educator preparation program reporting from language such as “ensures” and “analyzes” to “demonstrate” specific outcomes by program completers, including educator evaluation data.
- Amends the language related to approved programs leading to Professional licensure to require that such programs be part of a master’s or higher-degree program.
- Adds language to give approved programs a period of 18 months after the issuance of new or updated Subject Matter Knowledge Guidelines to align program requirements.

MTA Response

The MTA opposes the proposed changes set forth in 603 CMR 7.03(2) that require approved programs to “demonstrate continuous improvement ... that includes the analysis of state-available data.” The reliance on state-available data has a potential impact of disproportionately emphasizing standardized test scores provided by teacher licensing exams and statewide student assessment offered only in limited grades and subject areas. Student performance on such assessments is also outside of the control of any single educator and even less so impacted by an educator preparation program. Data related to student performance, educator evaluation and other measures of educator effectiveness administered at the local level after a candidate has exited the preparation program should not be included in program approval (603 CMR 7.03).

The National Education Association and the American Association of Colleges for Teacher Education have opposed federal regulations that require the use of student test scores in evaluations and ratings of educator preparation programs. Other accrediting organizations have failed in their efforts to implement ratings of educator preparation programs based on student standardized test data. There is simply no research or model for Massachusetts to implement this practice going forward.

The MTA notes with concern the disproportionate impact the proposed regulatory amendments will have on educator preparation programs that are housed in Massachusetts public institutions of higher education. Educator preparation programs at public colleges and universities prepare a high number of in-state educators. The increased emphasis on “state-available data” and the existing requirements to include educator evaluation data as program-approval criteria will unfairly disadvantage in-state programs who serve all of Massachusetts.

The MTA supports the addition of language under 603 CMR 7.03(3)(b)(2) to require that programs leading to a Professional license be housed in master’s or higher graduate-level programs.

The MTA has no opinion on the proposed amendment to allow approved programs a window of 18 months to update program requirements. The MTA does recommend changing the reference included in the proposed amendments in 603 CMR 7.03(8)(b) from 603 CMR 7.06 *Subject Matter Knowledge Requirements for Teachers* to 603 CMR 7.04(3) *Licenses Issued*.

Additional MTA-Proposed Amendments

MTA-Proposed Amendments in Blue DESE-Proposed Amendments in Red	MTA Comment
<p>603 CMR 7.03(3)(a) The following additional requirements apply to baccalaureate teacher preparation programs:</p> <p>1.—For elementary, teacher of students with moderate disabilities, teacher of students with severe disabilities, teacher of the deaf and hard of hearing, and teacher of the visually impaired licenses: not less than 36 semester hours in upper and lower level arts and sciences coursework addressing the relevant subject knowledge topics for those licenses set forth in 603 CMR 7.06.</p>	<p>The MTA recommends deletion of this language as it is duplicative of the earlier sections. Any program-specific requirements should be included in Guidelines for Program Approval and/or within the proposed Pre-Practicum Guidelines.</p> <p>Additionally, the language in these existing regulations that refers to grade levels will be out of alignment with the proposed amendments to 603 CMR 7.04(3)(a) where there are proposed changes to grade levels for multiple licenses.</p>

<p>Some of this coursework might also count toward the required arts or sciences major or general education requirements.</p> <p>2. For middle school licenses: 36 semester hours in a mathematics/science or English/history program of studies. This does not exclude the possibility of obtaining a single subject license in any of these subjects for grades 5-8.</p> <p>3. For the general science license: at least 36 semester hours addressing the topics for the general science license.</p>	
<p>603 CMR 7.03(3)(b)(1)</p> <p>Approved teacher or specialize teacher license program sponsored by an alternative preparation organization of at least 50 contact hours of content-based seminars beyond the induction year.</p>	<p>The MTA recommends removing language that is out of date. DESE staff have indicated that there are no existing approved programs for Professional licensure under this provision. Any program that would potentially meet such requirements is duplicative of other approved routes to the Professional license.</p>
<p>603 CMR 7.03(3)(b)(2)</p> <p>1. For early childhood, elementary, physical education, teacher of students with moderate disabilities, teacher of students with severe disabilities, teacher of the deaf and hard of hearing, teacher of the visually impaired, and other teacher licenses at levels PreK-8: at least half the credits are in any combination of: upper level undergraduate or graduate courses in arts or sciences or in professional schools, in the subject matter knowledge of the license sought; and pedagogical courses advanced beyond those for the Initial license based on subject matter knowledge of the Professional license sought.</p> <p>2. For specialist teacher licenses and teacher licenses at levels 5-12 and All: at least half the credits are in upper level undergraduate or graduate level courses in arts or sciences or in professional schools and are in subject matter knowledge or pedagogical courses advanced beyond those for the Initial license based on the subject matter knowledge of the Professional license sought.</p>	<p>The MTA recommends deletion of language that creates specific course requirements for approved educator preparation programs. This language creates a regulatory burden for programs. Course requirement guidance can be set forth through formal guidelines developed after consultation with the field and after a period of public comment.</p>

<p>3. For teacher licenses at levels 8-12: at least half the credits are in graduate-level courses in arts or sciences or in professional schools, in subject matter knowledge or pedagogical courses advanced beyond those for the initial license based on the subject matter knowledge of the Professional license sought.</p>	
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Types of Educator Licenses, Requirements for Licensure, Licenses Issued, and Requirements for Field-Based Experiences 603 CMR 7.04 DESE-Proposed Amendments

- Changes the license type from *Preliminary* to *Provisional* license in the language throughout this section.
- Eliminates required additional seminars or courses in reading, English language arts and mathematics for Preliminary (Provisional) Early Childhood, Elementary, Teacher of Students with Moderate Disabilities, Teacher of Students with Severe Disabilities and Teacher of Visually Impaired students.
- Condenses regulatory language describing the routes to the Professional license.
- Changes requirements and eligibility for educators seeking the Temporary license.
- Changes grade levels for certain subject-area licenses.
- Creates a Digital Literacy and Computer Science license.
- Changes the name for certain licenses, including the Early Childhood With and Without Disabilities to Early Childhood, Political Science/Political Philosophy license to a Social Science license.
- Moves the Instructional Technology Teacher license to an Instructional Technology Specialist Teacher license
- Eliminates the Academically Advanced Specialist Teacher license.
- Adds language establishing formal Pre-Practicum Guidelines for approved educator preparation program requirements.

MTA Response

MTA members have expressed concern about condensing the grade levels for biology, chemistry, earth and space science, English, history and social science. The DESE-proposed amendments result in only the 5-12 or 8-12 grade-level license going forward. The MTA notes with concern that the curriculum frameworks, pedagogical practices and the social and emotional needs of students are very different among these broad grade-level spans. At a minimum, the MTA recommends that all educator preparation program requirements and Pre-Practicum Guidelines require teachers to complete adequate coursework in child growth and development and pedagogical practices appropriate to both middle- and secondary-level instruction.

The MTA opposes the proposed amendments to 603 CMR 7.04(2)(a)(5) and (6) that will eliminate “seminars or courses that address teaching these populations: i. reading, ii. English language arts, iii. mathematics.” The licenses impacted by these proposed amendments are for educators who teach our neediest students and are at the most critical junctures in their academic careers. Students deserve educators who are fully prepared to provide instruction and impact student learning on day one in the classroom. Such teachers are required to demonstrate subject matter knowledge through passing scores on the MTEL exams and through completion of competency reviews of subject matter knowledge areas. The MTEL exams and SMK competency review process measure only subject matter knowledge. The DESE is proposing to allow educators into classrooms serving very young children and/or those with special learning needs who have no preparation or courses in the pedagogical practices of reading, English or math.

The DESE should engage an advisory group of experts in the fields of these licenses to review the regulatory requirements for such licenses and develop a process to ensure that all students have access to fully qualified and prepared educators. The MTA has proposed language below that will satisfy the goals of streamlining the regulatory requirements while also ensuring equitable access to fully prepared educators. The MTA proposals will help to close the DESE-identified gaps where students in low-income schools are assigned educators who are underprepared to meet the needs of all students (<http://www.doe.mass.edu/educators/equitableaccess/Playbook.pdf>).

The MTA agrees in concept with the proposed amendments for the routes to Professional licensure under 603 CMR 7.04(2)(c). MTA members have expressed deep concern that the DESE is seeking to lower the standards for a Professional license by eliminating the requirement for a master’s degree to obtain a Professional license. In the interest of clarity in these regulations and to ensure equitable access to educators with advanced knowledge and skills, the DESE must include language in this section that reasserts the requirement for a graduate-level degree or National Board for Professional Teaching Standards certification as part of the requirements for a Professional-level license.

The MTA is recommending additional technical changes in the section below to align the regulatory language under 603 CMR 7.04(2) with our proposed amendments under 603 CMR 7.03 related to approved programs leading to a Professional licenses.

Additional MTA-Proposed Amendments

The MTA encourages DESE to convene an advisory group to explore the development of licensure or an endorsement for individuals employed in positions related to Applied Behavior Analysis therapy.

In the interest of streamlining the regulations and improving the accessibility of the regulatory requirements for adding additional licenses and renewing an Initial license, the MTA recommends the following:

1. Move 603 CMR 15.02, Additional Licenses, to the end of 603 CMR 7.04. See MTA comments and proposed amendments to the existing language under 603 CMR 15.02.
2. Move 603 CMR 15.03, Renewal of an Initial License, before regulations related to the issuance of a Professional license within 603 CMR 7.04. See MTA comments and proposed amendments to the existing language under 603 CMR 15.03.

MTA-Proposed Amendments in Blue DESE-Proposed Amendments in Red	MTA Comment
<p>603 CMR 7.04(2) Requirements for Teacher Licensure</p> <p>(a) Provisional eliminary. This is available only for licenses under 603 CMR 7.04 (3) (a)</p> <ol style="list-style-type: none"> 1. Possession of a bachelor's degree. 2. Passing score on the Communication and Literacy Skills test. 3. Demonstration of the subject matter knowledge requirements published under guidelines set forth in 603 CMR 7.06 by obtaining a passing score on assessments approved by the Board of Elementary and Secondary Education or a competency review. -Passing score on the subject matter knowledge test(s) appropriate to the license sought, based on the subject matter knowledge requirements set forth in 603 CMR 7.06, where available. 4. Competency Review for candidates seeking the following licenses: <ol style="list-style-type: none"> a. Teacher of students with moderate disabilities, teacher of students with severe disabilities, teacher of the deaf and hard-of-hearing, and teacher of the visually impaired. b. Fields for which there is no subject matter knowledge test available. 5. Documentation of courses or seminars in the professional methods in each of the following areas: <ol style="list-style-type: none"> i. methods related to classroom management and addressing student behavioral needs. ii. pedagogical skills related to the role of the license. iii. Social and emotional learning needs of students at grade level of the license sought. 6. Educators seeking licensure in Early Childhood, Elementary, Teacher of Students with Moderate Disabilities, Teacher of Students with Severe Disabilities, Teacher of the Deaf and Hard-of-Hearing or Teacher of the Visually Impaired shall document seminars or courses in the pedagogical practices appropriate to the role of the license in 	<p>The revised subject matter knowledge requirements for license areas that currently require the Foundations of Reading or Reading Specialist MTEL exam should explicitly state that the SMK covered by these assessments – and therefore the appropriate MTEL – are required knowledge for the license area. Such language will also give the DESE appropriate flexibility to modify the licensure requirements and assessment tools to stay current with practices in public schools.</p> <p>The MTA recommends that candidates for any Preliminary/Provisional license be required to document coursework related to pedagogical practices and methods for supporting safe and supportive learning environments. These recommendations support the DESE initiatives to improve equitable access to effective educators by ensuring that no student is assigned a teacher who is unprepared to lead a classroom.</p> <p>Additionally, current regulations establish only one type of Teacher of the Deaf and Hard of Hearing license. Outdated language referring to separate Teacher of Deaf licenses (for example, Oral/Aural) should be eliminated.</p>

<p>each of the following areas:</p> <ul style="list-style-type: none"> i. reading ii. English language arts iii. mathematics iv. methods related to pedagogical practices of inclusion. <p>5. Additional requirements for the early childhood, elementary, teacher of students with moderate disabilities, teacher of the deaf and hard of hearing (Oral/Aural) and teacher of the visually impaired licenses:</p> <p>a. Seminars or courses that address teaching these populations:</p> <ul style="list-style-type: none"> i. Reading ii. English language arts iii. Mathematics <p>b.a. Seminars or courses on ways to prepare and maintain students with disabilities for general classrooms; for example, use of strategies for learning and of behavioral management principles.</p> <p>c.b. Passing score on the Foundations of Reading test.</p> <p>6. Additional requirements for the teacher of students with severe disabilities, and teacher of the deaf and hard of hearing (American Sign Language/Total Communication) licenses:</p> <p>a. Seminars or courses that address teaching this population:</p> <ul style="list-style-type: none"> i. Reading ii. English language arts iii. Mathematics <p>Seminars or courses on ways to prepare and maintain students with disabilities for general classrooms; for example, use of strategies for learning and of behavioral management principles.</p> <p>7. Evidence of sound moral character.</p>	
<p>603 CMR 7.04(2) Requirements for Teacher Licensure</p> <p>(c) Professional</p> <ul style="list-style-type: none"> 1. Possession of an Initial license in the same field as the Professional license sought. 2. Completion of a one-year induction program with a mentor and 50 additional hours of mentored employment beyond the induction year. 3. At least three full years of employment under the Initial license. 	<p>The MTA recommends additional streamlining of the language in the section related to induction and mentoring requirements for the Professional license.</p>

~~4. At least 50 hours of a mentored experience beyond the induction year, which may be fulfilled as part of a program option in 603 CMR 7.04 (2) (c)~~

5. Completion of one of the following:

~~a. Approved district-based program for the Professional license sought as set forth in 603 CMR 7.03 (2) (b) 1. a.~~

~~a. A master's or higher graduate level program in an accredited college or university that is or includes one of the following:~~

~~b.a. Completion of An approved master's or higher licensure program for the Professional license sought as set forth in 603 CMR 7.03 (3)(b) (b) (2) (b) 1. b.~~

~~b. Programs leading to eligibility for master teacher status, such as those sponsored by the National Board for Professional Teaching Standards and others accepted by the Commissioner.~~

~~A master's degree program or other advanced graduate program in the academic discipline appropriate to the license sought in a graduate or professional school other than education.~~

~~A master's degree program or other advance graduate program in the academic discipline appropriate to the license sought in a graduate or professional school other than education.~~

c. Completion of any master's or higher degree in an accredited college or university and documentation of completion of 12 graduate level credits in the subject matter knowledge or pedagogical practices related to the field and level of the licenses.

~~c. For those who have completed any master's or higher degree or other advanced graduate program in an accredited college or university, at least 12 credits of graduate level courses in subject matter knowledge or pedagogy based on the subject matter knowledge of the Professional license sought; these may include credits earned prior to application for the license~~

~~Approved, non-degree, 12-credit program of which no fewer than nine credits are in subject matter~~

The MTA proposes the addition of clarifying language in this section pursuant to MTA's comments for 603 CMR 7.03(3)(b), where the MTA recommends elimination of the regulatory language authorizing approved programs leading to the Professional license that are not part of a master's or higher-level program.

In the interest of clarity for educators seeking a Professional license, the MTA strongly recommends that DESE include language in the section unambiguously indicating that approved programs for Professional licensure must be part of a master's or higher-level graduate program or National Board for Professional Teaching Standards certification.

The MTA proposes language pursuant to this section that is clear and readable for all educators. The MTA-proposed language also encourages the completion of graduate-level coursework in pedagogical practices related to the field and level of the license.

<p>knowledge or pedagogy based on the subject matter knowledge of the Professional license sought as set forth in 603-CMR 7.03 (4) (b) 1-12 credits of graduate level courses in subject matter knowledge or pedagogy based on the subject matter knowledge of the Professional license sought; these may include credits earned prior to application for the license.</p> <p>Programs leading to eligibility for master teacher status, such as those sponsored by the National Board for Professional Teaching Standards and others accepted by the Commissioner.</p> <p>d. A Department sponsored Performance Assessment Program, when available.</p> <p>6. Additional requirements for the teacher of the deaf and hard of hearing license (American Sign Language/Total Communication):</p> <p>a. Passing score on a test of sign language proficiency approved by the Department.</p>	
<p>603 CMR 7.04(3)(a)</p> <p>5. Digital Literacy/Computer Science</p> <p>20. Music: Vocal/Instrumental/General</p> <p>24. Speech</p>	<p>The MTA recommends simplifying the license names to Computer Science and Music. The additional language is unnecessary. The inclusion of the term “Digital Literacy” is misleading because the Massachusetts Digital Literacy and Computer Science frameworks apply to all grade levels, yet this license applies only to grades 5-12. MTA members who are licensed under existing Instructional Technology licenses and Library licenses expressed concern that many of the same subject matter knowledge requirements are already covered under Instructional Technology and Library licenses. The elimination of the phrase “Digital Literacy” from the name of the license will reduce confusion and misunderstanding of the roles of Instructional Technology Specialists, Librarians and Computer Science teachers.</p> <p>The MTA recommends eliminating the Speech license. Fewer than 20 such licenses have been issued since 2003, according to data provided by DESE. As DESE has recently adopted revised curriculum frameworks for English language arts, revised subject matter knowledge requirements could incorporate any areas of the Speech SMKs that are not already covered under an English license.</p>

<p>603 CMR 7.04(3)(c)</p> <ol style="list-style-type: none"> 1. Superintendent/Assistant Superintendent 2. School Principal/Assistant School Principal 3. Supervisor/Director 4. Special Education Administrator 5. School Business Administrator 	<p>The MTA recommends simplifying the language related to administrator licenses by removing the unnecessary reference to “assistant”-level positions. The names of these licenses do not encompass all of the roles or employment permissible under the license.</p>
<p>603 CMR 7.04(4)</p> <p>Practicum or Practicum Equivalent Requirements are as follows:</p> <p>(a) Early Childhood: Teacher of Students With and Without Disabilities (100 hours in PreK-K, 200 hours in 1-2; at least one setting must include children with disabilities) ————— 300 hours</p> <p>(b) Teacher, Grades 1-6 ————— 300 hours</p> <p>(c) Teacher, Grades 5-8 300 hours</p> <p>(d) Teacher, Grades 8-12 ————— 300 hours</p> <p>(e) Teacher, Grades PreK-6 or PreK-8 — 300 hours</p> <p>(f) Teacher, Grades 5-12 ————— 300 hours</p> <p>(g) Teacher, All (150 hours at each of any two of the following levels: PreK-6, 5-8, 8-5-12) ————— 300 hours</p> <p>(h) Teacher of Students with Moderate Disabilities (for PreK-8, 300 hours in an inclusive general education setting or 75 hours in an inclusive general education setting and 225 hours in a separate or substantially separate setting for students with moderate disabilities; for 5-12, 300 hours in an inclusive general education classroom or 150 hours in an inclusive general education classroom and 150 hours in a separate or substantially separate setting for students with moderate disabilities)* *300 hours</p> <p>(i) Teacher of Students with Severe Disabilities (at least 75 hours in an inclusive general education classroom at any level, and at least 150 hours in a setting with students with severe disabilities; the remaining 75 hours may be in either setting) ————— 300 hours</p> <p>(j) Specialist (unless otherwise indicated) 150 hours</p> <p>(k) Superintendent/Assistant Superintendent 500 hours</p> <p>(l) Principal/Assistant Principal 500 hours</p> <p>(m) Supervisor/Director 300 hours</p> <p>(n) Special Education Administrator 500 hours</p> <p>(o) School Business Administrator 300 hours</p> <p>(p) Professional Support Personnel</p> <p>(See individual license requirements)**</p>	<p>Practicum requirements and supporting regulatory language should be updated to align with the changes to licensure levels under 603 CMR 7.04(3). Since the requirements are the same or similar for any teacher preparation program for grades 1-12, there is no need to differentiate among grade levels.</p> <p>DESE should develop streamlined regulatory language that sets the required minimum hours for program practicums at 300 for all licenses in fields listed under 603 CMR 7.04(a). Any variances from the 300-hour standard or required distribution among different settings should be included in guidelines for approved preparation programs that are developed in consultation with the field and subject to a period of public comment.</p>

Routes to Initial Teacher and Specialist Teacher Licenses 603 CMR 7.05 DESE-Proposed Amendments

- Consolidates existing regulatory language that describes the various routes to obtaining an Initial-level teacher license or specialist teacher license.
- Establishes three routes to the Initial license:
 1. Completion of an approved educator preparation program.
 2. Completion of the Performance Review for Initial Licensure as conducted by an approved provider.
 3. Pathway to Initial licensure for educators who have completed an out-of-state educator preparation program that is approved by DESE.

MTA Response

The MTA agrees with the proposed amendment to 603 CMR 7.05.

Additional MTA-Proposed Amendments

The MTA recommends additional amendments that will further the DESE goal of streamlining the regulations and improving student access to educators who are fully prepared to lead in the classroom.

MTA-Proposed Amendments in Blue DESE-Proposed Amendments in Red	MTA Comment
<p>603 CMR 7.05(2) Route Two is the Performance Review Program for Initial Licensure process for teacher candidates who hold a Provisional license ... Candidates seeking licensure under Route Two shall meet the following eligibility requirements:</p> <p>(a) Possession of a Provisional license in the field and at the level of the license sought. See 603 CMR 7.04 (2)(3) (a).</p> <p>(b) At least three full years of employment in the role of the Provisional license issued under 603 CMR 7.04(3)(a).</p> <p>(c) Documentation of 120 hours of seminars or courses related to pedagogy, developmental characteristics appropriate to the age level of the license sought and the Professional Standards for Teachers pursuant to 603 CMR 7.08.</p> <p>(d) A recommendation from the principal of each school where the candidate was employed under the Preliminary license or in the role of the license</p>	<p>The MTA recommends that DESE clarify in this section that PRPIL is available only for teacher licenses issued under 603 CMR 7.04(3)(a).</p> <p>The MTA recommends that the prerequisite preparation for candidates who seek Initial licensure via PRPIL is aligned with the coursework and knowledge of candidates prepared via other approved routes for licensure. There are currently no specific requirements for pedagogical knowledge, child growth and development or courses related to the Professional Standards for Teachers under PRPIL.</p> <p>The MTA recommends that DESE remove the language requiring the signature of a school</p>

<p>sought.</p> <p>(d) Completion of an induction and mentoring program as set forth under 603 CMR 7.12. Nothing shall prevent an educator from applying completion of the same induction and mentoring program to an application for a Professional license or to other licensure applications.</p> <p>(e) — A competency review for those license fields that have no subject matter knowledge test, or for which not all the subject matter knowledge required for the license is measured by the test.</p> <p>(e) For core academic teachers, possession of an SEI Teacher Endorsement.</p>	<p>administrator. This requirement has been abused by school administrators who seek to block an educator from meeting the requirements for an Initial license through PRPIL. The MTA has intervened in numerous cases where educators have been denied the recommendation of the principal for political and/or personal reasons unrelated to the licensure application.</p> <p>The MTA recommends substitute language that will require educators to document completion of the required district-based induction and mentoring programs. Such evidence will demonstrate a commitment to the profession and successful completion of employment-based requirements as part of the PRPIL application process.</p> <p>The MTA recommends eliminating language related to the competency review. This language is redundant given that candidates are already required to have demonstrated subject matter competency to obtain the Preliminary/Provisional license.</p>
<p>603 CMR 7.05(3)(a)(2) Completion of an educator preparation program sponsored by a college or university outside of Massachusetts that has been accredited by a national organization accepted by the United States Department of Education.</p>	<p>The MTA recommends that the standard for out-of-state educator preparation program accreditation be set by the United States Department of Education. By using the standard set forth by the US ED, educators have a clear measure by which to determine their eligibility for license reciprocity in Massachusetts. Using the opinion of the commissioner as the standard for accreditation will result in a lack of transparency. The commissioner should not be the sole measure of which accrediting organizations are appropriate to the field.</p> <p>The commissioner retains the authority to establish specific agreements with out-of-state educator preparation program providers who are not accredited by an organization recognized by the US ED under 603 CMR 7.05(3)(a)(1).</p>

Subject Matter Knowledge Requirements 603 CMR 7.06

DESE-Proposed Amendments

- Removes all language related to the content of subject matter knowledge requirements for all teacher and specialist teacher licenses.
- Establishes requirements that the Department publish guidelines detailing the subject matter knowledge requirements for educator licenses.

MTA Response

The MTA agrees with the concept of establishing formal guidelines containing the subject matter knowledge requirements for all Teacher, Specialist Teacher, Administrator and certain Professional Support Personnel licenses.

The MTA notes with concern the lack of regulatory requirements for the development and revision of subject matter knowledge requirements and the lack of a specified period and process for public comment on proposed changes. Please see our comments related to *603 CMR 7.02 Definitions* for related comments on this topic.

The MTA notes with concern the lack of regulatory requirements for establishing an advisory council of subject matter experts in the field of any proposed changes to the subject matter knowledge requirements for educators.

Additional MTA-Proposed Amendments

MTA-Proposed Amendments in Blue DESE-Proposed Amendments in Red	MTA Comment
<p>Application. The Subject Matter Knowledge Requirements shall be used by (a) approved educator preparation programs when designing a course of study leading to competency in the subject matter and pedagogical practices related to the field of the license, (b) the Department in evaluating and approving educator preparation programs leading to licensure, (c) as the basis of subject matter assessed by the Massachusetts Tests for Educator Licensure or other assessment accepted by the Department, (d) as the basis for conducting a competency review for a license field in which no MTEL or equivalent assessment accepted by the Department is available, and (d) as the content areas for which educators are eligible to apply Professional Development Points for the purposes of licensure renewal pursuant to 603 CMR 44.05 and 44.06. are used by sponsoring organizations in designing their teacher preparation programs and in preparing their candidates. The subject matter knowledge</p>	<p>The MTA is proposing language that unambiguously lists the anticipated use of the subject matter knowledge requirements for licensure. The proposed language directs educator preparation programs and licensed educators to refer to the most recent guidelines when developing coursework and professional development related to the content area and pedagogical skills related to a license.</p>

<p>requirements are also used by the Department in reviewing programs seeking state approval, and as the basis for the Massachusetts Tests for Educator Licensure.</p>	
<p>Requirements. The Department shall publish guidelines with detailed subject matter knowledge requirements for licenses set forth in 7.04 (3) and endorsements issued under 603 CMR 7.14 in which insufficient subject matter knowledge is stipulated in existing regulations. (a), (b), (c) 5. and (d) 1. and 4. Subject matter knowledge guidelines shall be developed in consultation with subject matter experts and educators who hold a Professional license related to the subject matter knowledge. All proposed subject matter knowledge guidelines shall be subject to a period of public comment not less than 60 days prior to publication of any revisions.</p>	<p>The MTA is proposing additional amendments pursuant to this section to increase the scope of subject matter knowledge guidelines published by DESE and authorize amendments to SMKs that remain in regulations.</p> <p>The MTA strongly recommends that DESE include regulatory language that requires input from experienced educators and experts in the field related to the area of subject matter knowledge and a public comment period of not less than 60 days.</p>

Specialist Teacher Licenses 603 CMR 7.07

DESE-Proposed Amendments

- Creates an Instructional Technology Specialist Teacher license that will require prior teaching experience and completion of an approved program.
- Eliminates the Academically Advanced Specialist Teacher license.

MTA Response

The MTA agrees with the proposed amendments to 603 CMR 7.07. Concerning the Instructional Technology Specialist Teacher license, the MTA recommends that the subject matter knowledge requirements for this license be revised by a team of subject matter experts and educators licensed in fields related to instructional technology.

It is the understanding of the MTA that the Department has also proposed to establish an Academically Advanced Endorsement issued pursuant to 603 CMR 7.14.

Additional MTA-Proposed Amendments

None

Professional Standards for Teachers 603 CMR 7.08

No proposed changes.

Licenses and Routes for Administrators 603 CMR 7.09

DESE-Proposed Amendments

- Changes the name of the *Preliminary*-level license to *Provisional*.
- Eliminates the required additional coursework for Supervisor/Director-level licenses in core academic areas.
- Establishes new regulatory procedures for administrator licensure applicants who have completed preparation programs and who hold an out-of-state administrative license.

MTA Response

The MTA agrees with the proposed change of name from *Preliminary* to *Provisional* as it applies to licenses issued under this section.

The MTA agrees with the proposed changes to the Supervisor/Director licenses and the requirements for content area knowledge graduate credits and the increased standard that will require applicants for a Supervisor/Director license to hold an Initial or Professional license and three years of experience under that license. Please see additional recommendations below.

The MTA has concerns regarding the lowering of professional standards related to administrators who are licensed and have employment experience out of state. Under the proposed language, there is no required evaluation of the Massachusetts Professional Standards for Administrative Leadership detailed indicators published by the Department pursuant to 603 CMR 7.10(3). There has been no analysis as to the equivalency of out-of-state administrator licensure requirements and the Massachusetts Professional Standards for Administrative Leadership. Candidates who have completed programs of questionable value and who have only one year of experience in some administrative capacity are exempt from demonstrating the high standards we expect of school leaders.

By contrast, any candidate for an administrator license within the Commonwealth of Massachusetts, regardless of prior school administrative experience, is still required to demonstrate successful application on the Professional Standards for Administrative Leadership by obtaining a passing score on the full Performance Assessment for Leaders (PAL). The MTA is proposing alternative language below related to this section.

Additional MTA-Proposed Amendments

In the interest of streamlining the regulations and improving the accessibility of the regulatory requirements for additional licenses, the MTA recommends that the Department move 603 CMR 15.03 Additional Licenses for Administrators to the end of this section. See MTA comments and proposed amendments to the existing language under comments related to 603 CMR 15.03.

The MTA has proposed simplification of the names of the existing administrator licenses. See our comments under 603 CMR 7.02.

The MTA recommends that DESE convene an advisory group to develop additional subject matter knowledge requirements for all school administrators that include, at a minimum, knowledge of policies, regulations, specific school laws, school finance, role of the school committee and laws pertaining to collective bargaining and collective bargaining agreements. These specific areas are not covered by the

Professional Standards for Administrative Leadership. Administrators who are unfamiliar with these issues drain critical financial resources from schools by creating unnecessary legal interventions.

The MTA recognizes that many skilled and experienced out-of-state school administrators may seek employment in Massachusetts public schools. Experienced administrators should be defined as educators who can document at least three years of experience in the role of the license sought. It is critical that Massachusetts recognize the differences among state education systems and school structures. Candidates must demonstrate experience in the specific role of the license to prevent administrators from being licensed to work in positions for which they are not qualified.

Massachusetts has invested considerable time and resources in developing the Professional Standards for Administrative Leaders and the Massachusetts Educator Evaluation System. Given that Massachusetts is recognized as a top educational system in the country, we should not lower the bar and accept educators who have met a lower standard of preparation.

The MTA is disappointed that DESE has not taken this opportunity to raise the bar for all school administrators. The MTA recommends adding a regulation that requires a minimum of 10 years of teaching or school-based employment under a Teacher, Specialist Teacher or Professional Support Personnel license as a prerequisite for all administrator licenses.

MTA-Proposed Amendments in Blue DESE-Proposed Amendments in Red	MTA Comment
<p>(6) Candidates from outside Massachusetts shall meet the following requirements:</p> <ul style="list-style-type: none"> a. Passing score on the Communication and Literacy Skills test. b. Demonstration of the Professional Standards for Leadership set forth under 603 CMR 7.10 through completion of a Performance Assessment for Initial License. <p>(1) Candidates with three years of experience in the role of the license sought may seek a Panel Review of courses, seminars and professional experience to demonstrate competency in the Professional Standards for Leadership set forth under 603 CMR 7.10 (2)(a-c).</p> <p>Completion of a Performance Assessment for Initial License or other assessment accepted by the Board of Elementary and Secondary Education shall be required 603 CMR 7.10 (2)(d) Professional Culture.</p> <p>For those with less than one year of experience in the role of the administrator license sought, demonstration of successful application of the Professional Standards for Administrative Leadership set forth in 603</p>	<p>The MTA has proposed amendments to this section that require specific demonstration of the Professional Standards for Administrative Leadership and require an assessment of knowledge and skills related to education evaluation and professional culture.</p>

<p>CMR 7.10 through completion of a Performance Assessment for Initial License.</p> <p>c. Completion of the appropriate prerequisite experience, licensure and endorsements set forth under 603 CMR 7.09 (1-5). and/or license as listed set forth in 7.09 for the license sought.</p> <p>d. For Principals/Assistant Principals and Supervisor/Directors supervising or evaluating core academic teachers, possession of an SEI Administrator or SEI Teacher Endorsement.</p> <p>e. One of the following:</p> <ul style="list-style-type: none"> i. Completion of a state-approved educator preparation master's or higher-level program in a state with which Massachusetts has signed the NASDTEC Interstate Agreement or other agreement accepted by the Commissioner. ii. Completion of a master's or higher-level educator preparation program sponsored by a college or university outside Massachusetts that has been accredited by a national organization accepted by the Commissioner recognized by the United States Department of Education. iii. Possession of the equivalent of at least an Initial license/certificate issued by a state with which Massachusetts has signed the NASDTEC Interstate Agreement or other agreement accepted by the Commissioner and three years of employment under such license/certificate during the previous seven years. 	<p>The SEI Endorsement requirement is embedded in the existing requirements for administrator licenses. The proposed language related to the SEI Endorsement in this section is duplicative.</p>
<p>(7) The Commissioner may waive the requirements listed in 603 CMR 7.09 (1) through (5), with the exception of a passing score on the Communication and Literacy Skills test, for candidates with significant leadership/managerial experience who meet the standards through both their experience and their formal education.</p>	<p>The MTA recommends eliminating language under this section, as our proposed language above creates an identical pathway through a Panel Review for educators who have significant leadership experience.</p> <p>The MTA continues to oppose any shortcuts to licensure that will award administrator licenses to individuals who have no experience as professional educators.</p>

Professional Standards for Administrative Leadership 603 CMR 7.10

No proposed changes.

Professional Support Personnel Licenses 603 CMR 7.11

DESE Proposed Amendments

- Changes the name of the *School Guidance Counselor* license to *School Counselor* and moves all subject matter knowledge requirements from regulations to guidelines.
- Adds language that clarifies the existing requirement for educators who hold a Professional-level School Nurse license maintain a valid Registered Nurse license.
- Moves the subject matter knowledge requirements for the School Social Worker/School Adjustment Counselor license to guidelines.

MTA Response

The MTA agrees with the proposed amendments to 603 CMR 7.11.

Additional MTA-Proposed Amendments

As noted above, the MTA recommends that subject matter knowledge guidelines shall be developed or revised in consultation with subject matter experts and educators who hold a Professional license related to the subject matter knowledge. All proposed subject matter knowledge guidelines shall be subject to a period of public comment for not less than 60 days prior to publication of any final revisions.

Standards for Induction Programs for Teachers 603 CMR 7.12

No proposed changes.

Standards for Induction Programs for Administrators 603 CMR 7.12

No proposed changes.

Endorsements 603 CMR 7.14

DESE-Proposed Amendments

- Adds language that specifically states endorsements issued under 603 CMR 7.14 do not constitute educator licenses.
- Adds language that expands the prerequisite requirement for the Autism Endorsement to any individual who has completed three credits related to special education or is in possession of an Initial-level license.
- Creates an optional Academically Advanced endorsement to replace the Academically Advanced Specialist Teacher license.

MTA Response

The MTA opposes the proposed amendment that expands the eligibility for the Autism Endorsement. The MTA reasserts its comments submitted to the Board of Elementary and Secondary Education on June 5, 2015, opposing the expansion of the Autism Endorsement to educators who do not hold a license related to special education. The MTA continues to assert the position that the Autism Endorsement must require a prerequisite license of an Initial or Professional license as a Teacher of Students with Moderate Disabilities, Teacher of Students with Severe Disabilities or Early Childhood: Teacher of Students With and Without Disabilities. Three credits related to special education is an insufficient requirement for educators to be legally employed as a teacher of record in public schools. Students with diverse learning needs deserve educators who are fully prepared to meet their needs.

The MTA continues to support the position that only teachers with a special education license qualify for the Autism Endorsement. The language approved in Chapter 226 of the Acts of 2014, Section 24, states that the Board of Elementary and Secondary Education shall promulgate regulations to provide an endorsement in autism for *licensed special education* teachers (emphasis added). Ideally, all teachers should have completed preparation in how to engage students with autism spectrum disorders as part of an approved educator preparation program. The MTA asserts that the purpose of the Autism Endorsement is to recognize educators who have completed an approved educator preparation program in special education and who have additional experience and subject matter expertise in working with students with autism.

Educators who seek to extend their knowledge and expertise in working with students with autism are in no way prevented from doing so under existing regulations.

The MTA agrees with the proposed amendments that clarify the purpose of endorsements and the creation of the Academically Advanced endorsement. The MTA is suggesting specific modifications in the section below.

Additional MTA-Proposed Amendments

The MTA recommends moving the subject matter knowledge requirements for all endorsements issued pursuant to this section to DESE guidelines. The MTA understands that there are concerns in the Department related to the statutory requirements for certain endorsements. However, the field of knowledge related to these endorsements will evolve over time and DESE should have a process for amending or supplementing the regulatory SMKs through the same guideline procedures. At a minimum, the subject matter knowledge requirements should be published alongside licensure subject matter knowledge requirements in any formal guidelines related to educator licensure, licensure renewal or program approval.

The MTA notes with concern that DESE has proposed the Academically Advanced endorsement requirements that are copied in whole from the existing requirements for an Academically Advanced Specialist Teacher license. The goal to streamline regulations suggests that all endorsements must be similarly designed to ensure the integrity and consistency of all endorsements. The MTA has proposed language below to align with other endorsement requirements.

MTA-Proposed Amendments in Blue DESE-Proposed Amendments in Red	MTA Comment
<p>603 CMR 7.14 (6) Academically Advanced (Levels: PreK-8)</p> <p>(a) Prerequisites: An Initial or Professional license in a core academic area for any of the grades PreK-8 and at least one year of teaching experience under any PreK-8 license.</p> <p>At least an Initial license in elementary, middle school, English, history, social science, political science/political philosophy, mathematics, or one of the sciences and at least one year of teaching experience under that license.</p> <p>(b) Demonstration of the subject matter knowledge and skills through a Department-approved course of student specific in providing instruction to students who are identified academically advanced. The Department will issue guidelines to govern approval of this course of study. Guidelines will be subject to a 60-day public comment period.</p> <p>(c) Completion of a 150-hour field experience in an instructional setting for students who are identified as academically advanced. The Department will issue guidelines to govern approval of the field experience.</p> <p>(d) Subject Matter Knowledge guidelines shall be developed in consultation with the Gifted and Talented Education Advisory Council and published pursuant to 603 CMR 7.06.</p> <p>(e) Individuals who have completed graduate-level coursework and documented employment experience that meets or exceeds the requirements set forth under 603 CMR 7.14(6)(b)</p>	<p>Remove the grade levels associated with the Academically Advanced endorsement. No other endorsement has assigned grade levels. The prerequisite licenses should signal the grades for which this endorsement is appropriate.</p> <p>Recommend elimination of the copy-and-pasted language from the Academically Advanced Specialist Teacher license.</p> <p>As with all other areas, guidelines should be developed in conjunction with subject matter experts and experienced educators in the field of the endorsement as well as be subject to a period of public comment not less than 60 days.</p>

and (c) shall be eligible for a Panel Review.

~~(b) Completion of an approved educator preparation program for the Initial license as set forth in 603 CMR 7.03 (2) (a). The practicum or practicum equivalent of 150 hours must be with a group of students identified by the district as academically advanced. Practicum or practicum equivalent must include approximately equal experience with academically advanced students both in a general education classroom and in classes for academically advanced students at two different grade levels.~~

~~(c) The topics set forth in the Subject Matter Knowledge Guidelines for the Middle School: Humanities and Middle School: Mathematics/Science licenses, together with the following topics, will be addressed on the test of subject matter knowledge:~~

~~i. Knowledge of ways to adapt curricular content from higher grade levels, especially in science and mathematics, for academically advanced students in lower grade levels.~~

~~ii. Design and implementation of accelerated curricula providing conceptual understanding for academically advanced students in mixed ability classrooms that enable them to engage in sustained study in a content area appropriate to their learning pace.~~

~~(d) The following topics shall be included in an approved program but will not be addressed on a test of subject matter knowledge:~~

~~i. Knowledge of curricular content in all the Massachusetts Curriculum Frameworks for PreK-10, with emphasis on either science and mathematics or the humanities.~~

~~ii. Emotional, social, and cognitive development and needs of academically advanced students.~~

~~iii. Design and implementation of accelerated curricula providing conceptual understanding for~~

<p>academically advanced students in groups (pullout grouping, cluster grouping, cross-graded classes, full-time ability grouping, regrouping for specific instruction).</p> <p>iv. Knowledge of research on issues related to the education of academically advanced students.</p> <p>v. Knowledge of federal and state laws on education for the academically advanced.</p> <p>(e) Individuals are exempt from the requirements set forth in 7.07 (1) (a) 1 through 4, if they hold an advanced degree in a relevant subject area or have at least three years employment by a school district in a role that included significant experience with students identified by the district as academically advanced and have passed one of the following subject matter knowledge tests: Middle School Mathematics/Science, Middle School Humanities, Middle School Mathematics, General Science, or any single subject matter test in an academic subject taught in 5-12 for which the Department issues a license.</p>	
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General Provisions 603 CMR 7.15

DESE-Proposed Amendments

- Changes language to update terms to align with all proposed amendments.
- Changes language related to the *Extension/Renewal* of the Initial license to align with current DESE practices.
- Makes significant changes to the rights of educators, DESE policies and procedures related to actions investigated by DESE following accusations of educator misconduct.
- Changes language on the conditions for employment as a Supervisor of Attendance.

MTA Response

The MTA strongly opposes the proposed amendments pursuant to 603 CMR 7.15(8) Revocation of Licenses/License Actions. These proposals are nothing less than shocking and the DESE should be embarrassed by the recommendation and its implications for free speech and the DESE overreach. The MTA Division of Legal Services will be providing comments related to proposed amendments under this section in a separate document.

The MTA has no position on the proposed language that establishes conditions for employment as a Supervisor of Attendance as set forth in the proposed 603 CMR 7.01(9)(a)(e).

The MTA notes with concern that DESE has made an effort to propose a language change to 603 CMR 7.15(9)(b) under general provisions for employment under a Preliminary license. DESE has proposed changing the language to reflect the new name of *Provisional*. However, DESE makes no proposal to remove or alter the existing language, which states, “Persons holding Provisional/*Preliminary* licenses are permitted to seek employment in teaching positions requiring licensure in school districts that have an approved program of preparation for the Initial license.” Thus, DESE continues to put forward policies that violate M.G.L. Ch. 71 Sec. 38G by allowing districts to employ educators with a Preliminary/*Provisional*-level license and no approved program leading to the Initial license. Furthermore, the commissioner has failed to establish standards for training, support and supervision of provisionally licensed educators as required by the same statute.

The MTA supports the proposed amendments throughout 603 CMR 7.00 that will cap the number of years an educator can be employed under a Preliminary/*Provisional* license at five. However, the proposed amendment still allows five years of teaching with limited or no required professional preparation. According the 2013 Status of Educator Workforce (<http://www.doe.mass.edu/research/reports/2013-12EducatorReport.pdf>) report prepared by the Department of Elementary and Secondary Education, 26 percent of first-year teachers were employed under a Preliminary license in the 2012-2013 school year. To our knowledge, DESE has not released an updated study since then, nor has the department explored the disproportionate employment of educators with a Preliminary license in Level 5 schools and districts.

Additional MTA-Proposed Amendments

The MTA recommends relocating the regulatory language set forth in 603 CMR 7.15(2) *Additional Licenses* and language set forth in 603 CMR 7.15(3) *Additional Licenses for Administrators* to the sections applicable to such licenses.

The MTA also recommends that DESE review and revise the requirements for *Additional Licenses for Administrators* set forth under 603 CMR 7.15(3) to ensure consistency for administrators who are seeking to add a license, or a license at a new level, with the requirements for out-of-state administrators. As currently written, a Massachusetts-licensed administrator with years of experience in teaching, union leadership and school administration in state is required to complete the Massachusetts Performance Assessment for Leaders (MA-PAL) and demonstrate proficiency of the Professional Standards for Administrative Leadership simply to add a grade-level range to the same field of licensure.

Yet an out-of-state administrator with only one year of experience is not required to complete MA-PAL to obtain an administrative license. Specifically, the current regulations require in 603 CMR 7.15(3), “(4) Prerequisite Licenses. The requirement that an applicant for licensure hold a Massachusetts educator license may be waived for an applicant who has earned an equivalent license based on the same level of preparation in another state or jurisdiction.” There is an inconsistency in requirements for in-state and out-of-state educators that needs to be addressed. All out-of-state-educators should meet the same standards required of in-state candidates.

MTA-Proposed Amendments in Blue DESE-Proposed Amendments in Red	MTA Comment
603 CMR 7.15(14) Implementation. (g) After July 1, 2019, holders of provisional license	The MTA recommends language to clarify the implementation of this provision. Further, the DESE should convene an advisory committee with representatives from the field to develop

<p>(s) will have five total years of employment under any combination of provisional licenses regardless of the date of issue. The DESE will develop guidelines for the implementation of this provision in consultation with the Educator Personnel Advisory Council.</p> <p>(g) Individuals who obtained provisional licenses prior to June 30, 2019 will have no more than five years of employment under the provisional license as of July 1, 2019.</p>	<p>guidelines for the implementation schedule. All guidelines should be subject to a 60-day public comment period.</p>
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