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October 31, 2017

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

From: Barbara Madeloni, MTA President

Subject: Public Comment on Pre-Practicum Policy Proposals

Attached are public comments submitted on behalf of the 110,000 members of the Massachusetts Teachers Association regarding the Pre-Practicum Policy Proposals. The MTA has reached out to its members to gather input on the proposed amendments through in-person meetings with educators, local associations and their representatives who are impacted by these policies.

The MTA supports the strengthening of statewide standards for educator preparation by ensuring that all professional educators are fully prepared to enter the classroom after satisfying the requirements of a high quality educator preparation program.

The MTA is of the understanding that these are draft policy proposals and do not reflect the final guidelines that will be published by the Department. The MTA looks forward to the publication of the Draft Guidelines for Pre-Practicum requirements in March and the required thirty-day public comment period on the guidelines as required under 603 CMR 7.02 prior to issuing final guidelines.

The MTA understands that the proposed policies are likely to change significantly after this initial period of public feedback and therefore our comments will focus on the nine proposed policies and not the narrative or background of the policies. The MTA also proposes consideration of a tenth policy area related to pre-practicum experiences related to family and community engagement. The Professional Standards for Teachers (603 CMR 7.08(2)(c) call for educators to cultivate “effective partnerships with families, caregivers, community members, and organizations.” This standard is not addressed in the Pre-Practicum Policy Proposals.

As these guidelines are for sponsoring organization who administer approved educator preparation programs to use when developing or revising an approved program for licensure, these guidelines should be directed to actions on the part of the educator preparation program. Candidates cannot be directed or held responsible for satisfying requirements that are neither required nor offered by an approved program.

The MTA believes that the 200-ours of pre-practicum experience is explicitly defined as experiences that take place in school-based settings. With the exception of activities under the MTA proposal ten (related to family and community engagement experiences) general coursework, peer-observations or other activities that take

place on-campus or outside of a PreK-12 public educational setting should not count towards the 200 hour requirements.

The draft policies appear to include elements that do not comply with regulatory requirements related to field-based experiences. In the introductory section of the draft policies, the department references 603 CMR 7.02 where regulations stipulate that the pre-practicum involves “early field-based experiences with diverse student learners, integrated into courses or seminars that address the Professional Standards for Teachers.” In addition, the regulatory definition of Field Based Experience (603 CMR 7.02) requires “observation of a variety of classrooms, pre-practicum, practicum/practicum equivalent, internship, apprenticeship, or administrative internship that are integral components of any program for the preparation of educators. The regulations clearly require pre-practicum activities to take place in school-based settings. Field-based experiences shall cover a range of time periods within the school year.” Any activity that is not based in schools or in partnership with related services providers does not comply with the regulatory requirements.

A strong system for developing educators who are fully prepared to enter the classroom requires that all educator preparation programs hold all candidates to the same high standards. These Pre-Practicum Policy Proposals should be applied consistently across all approved educator preparation programs and routes to Initial license.

While we understand these are draft policies, the MTA notes that in several places the language appears to conflate the requirements and expectations of approved programs, candidates, school based faculty, pre-practicum, practicum and Candidate Assessment of Performance (CAP). The MTA substitute language proposed below seeks to focus the required activities as actionable on the part of the approved program and establish requirements that are specific to the pre-practicum (school based experiences prior to entering the formal practicum) only.

Draft Policy	MTA Comment
<p>1. Candidates must complete a minimum of 200 hours of pre-practicum. This field-based experience should be fully integrated into a candidate’s program of study, with opportunities for meaningful engagement in PK-12 classrooms (see Section II: Content of Pre-Practicum) starting with a candidate’s first courses in a program.</p>	<p>The MTA supports a minimum of 200-hours of pre-practicum school-based experiences for candidates enrolled in educator preparation programs. These school-based experiences may include observations, targeted skill practice, small group instruction, large group instruction, co-teaching or other student interactions.</p> <p>The MTA notes with concern that the impact on classroom educators who volunteer to host candidates in educator preparation programs should be considered when further developing guidelines or course requirements with in the programs.</p> <p>The MTA proposes the following substitute language:</p> <p><i>1. Sponsoring organizations are required to embed a minimum of 200 hours of school-based experiences in coursework and program requirements as part of an approved educator preparation program. Candidates must satisfy all coursework, school-based experiences and assessment requirements prior to entering into the Practicum.</i></p> <p><i>Sponsoring organizations are encouraged to embed school-based experiences in program coursework upon candidate matriculation into an approved educator preparation program.</i></p> <p><i>Sponsoring organizations may develop policies to review and apply school-based experiences completed prior to a candidate’s matriculation into an approved educator preparation program (either as part of professional employment or non-program course work) towards satisfying one or more of the requirements. The department shall consider such policies as part of program review and approval.</i></p> <p>Professional Standards for Teachers Addressed: (a)Curriculum, Planning, and Assessment, (b)Teaching All Students, (c)Family and Community Engagement, (d)Professional Culture</p>

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<p>2. The pre-practicum must be comprised of activities and assignments that bridge theory and practice, mirror the work of teaching, and build towards full candidate readiness. This must include opportunities to perform the PST indicators at the appropriate level of practice (introduction, practice, or demonstrate) in preparation to meet readiness expectations in the practicum.</p>	<p>The MTA agrees in concept that school based experiences should bridge program coursework and professional practices.</p> <p>The MTA proposes the following substitute language:</p> <p><i>2. Sponsoring organizations shall use the subject matter knowledge requirements, Professional Standards for Teachers (PST) and current pedagogical practices when designing school-based experiences. The sequence of required coursework should be designed to explicitly build candidate knowledge, skill and abilities through a process of gradual release from direct instruction by program faculty, guided practice and independent demonstration of pedagogy using Candidate Assessment of Performance rubric in conjunction with assessments designed by the sponsoring organization as common assessment tools.</i></p> <p>Professional Standards for Teachers Addressed: (a)Curriculum, Planning, and Assessment, (b)Teaching All Students</p>
<p>3. The pre-practicum must include opportunities to practice the PST indicators in authentic settings, including both PK-12 classrooms and low-risk environments such as mixed-reality simulations, role-plays, and/or mock lessons</p>	<p>The proposed language will permit sponsoring organizations to count program time that is not embedded in school-based settings as fulfilling the 200- hour pre-practicum requirements. This appears to be in direct conflict with the regulatory definition of “field based experiences” in 603 CMR 7.02.</p> <p>A “low-risk” activity may be appropriate for learning theory and introduction to pedagogical skills. However, these low-risk experiences should not be included in the 200 hours of school-based pre-practicum experiences.</p> <p>Allowing some sponsoring organizations to design school-based experiences that are not actually based in schools while other programs will require more extensive school-based experiences will result in disparate outcomes and candidates who are unprepared to enter the classroom. The program type or geographic location of the sponsoring organization should not be an excuse to provide fewer hours in</p>

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	<p>school-based settings.</p> <p>The MTA proposes the following substitute language:</p> <p><i>3. Multiple opportunities for candidates to practice pedagogical skills shall be embedded in approved program coursework.</i></p> <p><i>Sponsoring organizations shall not calculate time spent on application of theories to lesson plans or pedagogical skills, mock lessons delivered to peers, roles plays or mixed-reality simulations as part the 200-hours of pre-practicum school based experiences.</i></p> <p>Professional Standards for Teachers Addressed: (a)Curriculum, Planning, and Assessment, (b)Teaching All Students</p>
<p>4. The pre-practicum must include opportunities to participate in at least two series of Instructional Rounds.</p> <p>Instructional rounds consist of focused observations of multiple classrooms and a guided debrief. These instructional rounds should occur in classrooms representative of the full range of grade-levels and/or delivery models within the pursued licensure field or level.</p>	<p>The proposed requirement of embedding “instructional rounds” into pre-practicum experiences is overly specific and unlikely to be implemented with fidelity or with any measure of quality. The “instructional rounds” model would require that multiple school-based educators volunteer to make their classrooms available to both observation and critique. “Instructional Rounds” can also be disruptive to student learning. Done poorly, this policy will result in the refusal of school-based educators to agree to participate in a disruptive practice.</p> <p>“Instructional rounds” will not ensure that candidates are well prepared to enter a practicum experience nor will observations and debriefings in a single school adequately prepare future educators to work in any Massachusetts public school.</p> <p>The MTA believes policies that ensure candidates have opportunity to observe, engage and practice in diverse classroom experiences will yield better outcomes for candidates.</p> <p>The MTA proposes the following substitute language:</p> <p><i>4. Sponsoring organizations shall take all reasonable steps to ensure candidates have experiences observing, engaging and practicing in classrooms representing diversity of student ages, grade levels, student learning</i></p>

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	<p><i>characteristics (e.g. special education, English learner, high needs), community socio-economic status and school accountability level. Each approved program shall require a minimum of three different on-site experiences.</i></p> <p><i>Sponsoring organizations shall provide data demonstrating the diversity of pre-practicum experiences completed by candidates as part of the program approval process</i></p> <p><i>Professional Standards for Teachers Addressed: (a)Curriculum, Planning, and Assessment, (b)Teaching All Students, (d)Professional Culture</i></p>
<p>5. Pre-practicum candidates must be observed and receive feedback on their performance at least twice by a supervisor who is fully calibrated with the SO's expectations and has a firm understanding of the candidate's coursework. Feedback may be based on an in-person observation or a video of the candidate's lesson. It is highly recommended that ed prep faculty conduct at least one observation of the candidate in the field during pre-practicum in order to continue to build the bridge between theory and practice for the candidate. Feedback from these observations should be used to set a professional practice goal and complete a self-assessment prior to or at the start of the practicum as part of the pre-cycle stage of the Candidate Assessment of Performance.</p>	<p>The MTA agrees a process for observation and feedback is a critical element of educator development. The proposed language is confusing and appears to reference activities, experiences and roles more appropriate to the practicum experience. For example, there is no supervising practitioner (cooperating teacher) a pre-practicum field experience.</p> <p>The MTA also proposes language related to policy nine that strengthen the requirements of sponsoring organizations to provide professional development and improve inter-rater reliability among program faculty and school-based faculty.</p> <p>The MTA proposes the following substitute language:</p> <p><i>5. Sponsoring organizations shall include a minimum of two opportunities for candidates to provide direct instruction to students in small or large group settings. Sponsoring organizations shall develop procedures for observations, assessment of candidate performance and system of feedback to candidates that is aligned to the Candidate Assessment of Performance scoring rubric.</i></p> <p><i>Assessment of direct instruction shall be completed by program faculty using common assessment tools.</i></p> <p><i>Professional Standards for Teachers Addressed: (a)Curriculum, Planning, and Assessment, (d)Professional Culture</i></p>

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<p>6. Pre-practicum candidates must video themselves teaching at least twice. This is a powerful way to make their teaching visible, provide an opportunity for reflection and peer-to-peer feedback, and improve instruction.</p>	<p>The MTA is opposed to a broad mandate of videotaping candidates. A blanket policy that requires candidate to take a specific action offers no meaningful input or opportunity for professional growth. Such policies place value on process over content.</p> <p>While the MTA understands that reviewing videos of a candidate delivering instruction is one method for practicing self-assessment and reflecting on professional practice; it should not be mandated.</p> <p>Furthermore, no candidate should be required to produce a video tape in lieu of direct observation by program faculty and/or school based supervisors.</p> <p>The MTA proposes the following substitute language:</p> <p><i>6. Sponsoring organizations shall embed explicit activities related to reflective practice as part of school based experiences. Candidates will have multiple opportunities to self-assess effectiveness of lessons, student engagement, collaboration with colleagues and application of pedagogical skills. Sponsoring organizations may use elements of the Candidate Assessment of Performance in conjunction with observations, peer observations, videotaping or other feedback protocols developed by the sponsoring organization.</i></p> <p>Professional Standards for Teachers Addressed: (a)Curriculum, Planning, and Assessment, (b)Teaching All Students, (d)Professional Culture</p>

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<p>7. There must be a minimum of two explicit gateway assessments of candidate performance during the pre-practicum. Candidates must meet these benchmarks in order to enter the practicum phase of their program.</p> <p>Gateways should be performance-based measures of the Professional Standards for Teachers, outcomes oriented, and authentic to the actual work of teaching. They should be used to identify at-risk candidates during pre-practicum and provide them with the necessary supports and guidance to improve or exit the program.</p> <p>Gateways should include a combination of: assessment of performance on the PSTs; supervisor evaluation; dispositions assessment; and course grades or GPA.</p>	<p>Gateway assessments within educator preparation programs are widely used to provide feedback to both candidates and program faculty. Such assessments should be part of the general requirements of an approved program.</p> <p>While such assessments may be linked to the pre-practicum experiences, they should also exist outside of school-based experiences. The proposed language does not provide new or substantial guidance to sponsoring organizations that will have a meaningful impact of candidate experiences.</p> <p>Most, if not all, sponsoring organizations have existing requirements for progression through approved programs including minimum GPA, program application requirements, recommendations, MTEL tests and coursework requirements.</p> <p>The MTA proposes the following substitute language:</p> <p><i>7. Sponsoring organizations shall develop a schedule of gateway assessments and minimum performance standards that candidates are required to demonstrate at key transition points as part of an approved educator preparation programs.</i></p> <p><i>Each approved educator preparation program’s set of gateway assessments shall consider minimum requirements for:</i></p> <ul style="list-style-type: none"> <i>a. Candidate overall GPA</i> <i>b. Candidate GPA in program courses</i> <i>c. Communications and Literacy MTEL Exam</i> <i>d. Content-area MTEL exams</i> <i>e. Candidate dispositions assessment administered by program faculty</i> <i>f. Course-based assessments in each of the following areas:</i> <ul style="list-style-type: none"> <i>i. Well-structured lessons</i> <i>ii. Using student data</i> <i>iii. Diverse student needs</i> <i>iv. Pedagogical skills related to a safe and supportive learning environment</i> <i>v. High expectations for student performance</i> <i>vi. Reflective practice</i>

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	<p data-bbox="889 218 1312 249"><i>vii. Parent and family engagement</i></p> <p data-bbox="824 291 1481 428">Professional Standards for Teachers Addressed: (a)Curriculum, Planning, and Assessment, (b)Teaching All Students, (c) Family and Community Engagement, (d)Professional Culture</p>
<p data-bbox="188 848 776 1125">8. For candidates who are teachers of record, the pre-practicum activities, assignments, and assessments described above must be front-loaded into the first three months of the school year in order to provide candidates with the support and feedback that they need to demonstrate readiness on the Candidate Assessment of Performance (CAP).</p>	<p data-bbox="824 848 1481 1058">The MTA believes that a policy statement that releases any candidate from satisfying comparable requirements across program type, regardless of the employment status of the candidate, will result in licensed educators who are not equally prepared for employment in Massachusetts public schools.</p> <p data-bbox="824 1100 1463 1310">Pre-practicum experiences should never be “front-loaded” to match a school year. Rather candidates should be granted flexibility to complete course work and pre-practicum experiences in a manner that minimizes disruption to the student learning of the students assigned to the candidate.</p> <p data-bbox="824 1352 1463 1383">The MTA proposes the following substitute language:</p> <p data-bbox="824 1425 1474 1593"><i>8. Approved educator preparation programs for candidates who are employed as a teacher of record in a public school shall make available comparable opportunities to satisfy pre-practicum experiences in diverse school settings.</i></p> <p data-bbox="824 1635 1474 1772"><i>Such approved programs shall collaborate with school-based administrators of such candidates to provide release time to complete pre-practicum requirements in diverse settings.</i></p> <p data-bbox="824 1814 1403 1875">Professional Standards for Teachers Addressed: (d)Professional Culture</p>

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<p>9. Providers must correspond with the teacher of record's school-based supervisor (e.g. principal) to ensure alignment of expectations and, to the extent possible, processes for calibrating feedback about performance.</p>	<p>As written, this proposed policy is confusing.</p> <p>The MTA is concerned about any proposal that would mandate that an educator's supervisor interfere with a relationship between an educator and a sponsoring organization or vice versa. The relationship between the sponsoring organization and the school-based educator should be independent.</p> <p>This proposed policy assumes that the school-based supervisor/administrator is knowledgeable, skilled and able to evaluate the knowledge, skills and abilities required for all educator preparation programs.</p> <p>At the pre-practicum level, it should be assumed that the majority of assessments administered to assessments will be scored by program faculty and program supervisors prior to the candidate beginning the full practicum experience. While feedback from school-based faculty and the three-way meeting format are valuable for candidate growth, all assessments should be completed primarily by program faculty without complicating interests of educator supervision and evaluation.</p> <p>To this end, the department should encourage sponsoring organizations to improve relationships among school-based educators and program faculty. Opportunities for professional learning and collaboration should occur regularly between any partner schools/organizations and the sponsoring organization.</p> <p>The MTA proposes the following substitute language:</p> <p><i>9. Sponsoring organizations shall demonstrate policies, procedures and opportunities for school based faculty and school based administrators to participate in professional development to ensure interrater reliability in administering the assessment tools. These professional development opportunities should be available to school based faculty who participate in pre-practicum programs and practicum experiences.</i></p> <p>Professional Standards for Teachers Addressed:</p>

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	<i>(d)Professional Culture</i>
	<p>There are no explicit requirements in the Pre-Practicum Proposals that require candidates to engage directly in family or community partnerships.</p> <p>Candidates should have meaningful opportunities to engage with families and organizations that support families/caregivers. Candidates deserve opportunities to build knowledge of cultural proficiency and out-of-school supports available to students.</p> <p><i>10. Sponsoring organizations shall include at least one opportunity for candidates to engage directly with school or community based partnerships and organizations that provide support to high need students. This may include tutoring, volunteering, case studies, project leadership or job shadowing directly with community groups.</i></p> <p><i>Professional Standards for Teachers Addressed: (c)Family and Community Engagement, (d)Professional Culture</i></p>