



Max Page, President

Deb McCarthy, Vice President

Lisa Gallatin, Executive Director Treasurer

TO: Brian Devine, Director and Tonya Safford
Office of Educator Licensure, Department of Elementary and Secondary Education
FROM: Max Page, President Deb McCarthy, Vice President
RE: Proposed Amendments to 603 CMR 7.00
DATE: June 2, 2023

On behalf of the 115,000 members of the Massachusetts Teachers Association, please find public comments on the proposed amendments to 603 CMR 7.00 as presented to the Board of Elementary and Secondary Education in April 2023. The MTA is concurrently reviewing the revised Competency Review Guide that is also open for public comment.¹

PreK-2 Special Education License (603 CMR 7.02(3)(a))

The MTA strongly supports the creation of the PreK-2 level for Teachers of Students with Moderate Disabilities and Teacher of Students with Severe Disabilities. Our members who work in early education programs, including kindergarten classrooms, have long been frustrated by the requirements to become dually licensed as special education and general education teachers. The existing requirement for early childhood educators to pass the elementary school content tests is inconsistent with the subject matter knowledge requirements for the PreK-2 license. The proposed license will allow more specialized students support provided by PreK-2 teachers.

Additional Provisional Licenses and Potential Conflict with 603 CMR 7.15(14)(g)

The MTA generally supports the proposal for teachers who already hold an Initial or Professional license to add certain special education and English as a second language licenses at the Provisional stage under 603 CMR 7.15(2).

The MTA is concerned about future employment restrictions for teachers who were previously employed under a Provisional license. Under 603 CMR 7.02 and 603 CMR 7.15(14)(g), a teacher who holds a Provisional license is limited to no more than five years of employment. For educators who exhaust the five total years of employment after July 1, 2024 (five years from the implementation date of July 1, 2019), the teacher could be prohibited future employment under a New Provisional ESL or special education license issued under 603 CMR 7.15(2).

The MTA encourages the department to consider a limited, one year exemption only for teachers impacted by 603 CMR 7.15(14)(g) to complete the remaining license requirements.

New Additional English as a Second Language Provisional License (603 CMR 7.15(2)(e))

The MTA is broadly concerned about staffing English learner programs with fully prepared teachers. This provision may reduce the paperwork for hardship waivers to employ teachers who are unlicensed, but the proposed pathway to add the New Provisional ESL license requires no related experience for teachers seeking this new license.

Additionally, the New Provisional ESL license as proposed will create a new path for the Sheltered English Immersion (SEI) Teacher Endorsement and the SEI Administrator Endorsement issued under 603 CMR 7.14. Teachers who do not already hold the SEI Endorsement would now be eligible for the SEI Endorsement without completing the SEI Endorsement course, passing the SEI MTEL or completing the 150-hour internship in the role of the ESL license.

¹ Public Comment Requested: Office of Educator Licensure Competency Review Guide
www.doe.mass.edu/news/news.aspx?id=27115



In 2012, following discussions with the Department of Justice concerning preparation and training requirements for educators of English learners², Department established the 150-hour internship for teachers adding an additional license as an English as a second language teacher as part of the Rethinking Equity in the Teaching of English Learners (RETELL). This was partly to discourage teachers from using the ESL MTEL as path to the SEI Endorsement after concerns were noted by the DoJ officials.

The MTA is recommending additional eligibility requirements consistent with existing credentials for core academic teachers and consistent with the proposed amendments for the New Provisional Teacher of Students with Moderate Disabilities and Teacher of Students with Severe Disabilities.

The MTA recommends the following additional requirements for the New Additional ESL license:

(e) New Provisional licenses in English as a Second Language.

Teachers holding an Initial or Professional license in any field, who hold the SEI Endorsement or have at least two years of experience in second language acquisition for English learners may earn a provisional license in English as a Second Language by achieving a passing score on the English as a Second Language test.

School Nurse Provisional License (603 CMR 7.11(2)(a))

The MTA supports the creation of the Provisional School Nurse license in concept. However, the proposed requirements for the Provisional School Nurse license are fewer than the existing requirements for the Emergency School Nurse license. In recognition that school nurses and school health centers provide services regulated by the Massachusetts Department of Public Health, the MTA encourages additional conversations with the Massachusetts School Nurse Organization and the DPH to ensure schools are staffed appropriately for essential services such as medication administration and health screenings.

Demonstrated Learning for Special Education Licenses

The MTA supports the proposed options for teachers to satisfy the requirements related to the requirements of “ways to prepare and maintain students with disabilities for general classrooms.” The proposed term “demonstrated knowledge” is a new term under this section of the regulations and is not explicit in what types of documentation will satisfy the application requirements.

We suggest the terms *seminars*, *courses* and *demonstrated knowledge* all have corresponding definitions under 603 CMR 7.02 Definitions such as:

Course: course of study that is equivalent to undergraduate course or a graduate-level course and verified by official transcripts

Seminar: instructor-led synchronous or asynchronous professional learning, workshop or other training delivered outside of institutions of higher education as verified by a certificate of completion or letter of verification provided by an appropriate representative of the provider as accepted by the department

Demonstrated Knowledge: documentation of knowledge, skills and abilities as verified by relevant employment experience, published research, school-based mentored employment in a school setting or performance assessment accepted by the department

² Commissioner Chester Memo to BESE on February 21, 2012. www.doe.mass.edu/bese/docs/fy2012/2012-02/item3.docx