

Doan, Erin (MDE)

From: Jim Bartholomew <jim.bartholomew@mnbp.com>
Sent: Sunday, November 29, 2015 9:37 PM
To: Doan, Erin (MDE)
Subject: Draft rules 8710.0450

Hi Erin:

Hope you've had a great Thanksgiving holiday.

I wanted to provide some comments based on the Nov. 3 draft rules for out of state teachers and the Board's related working group discussion.

For purposes of streamlining rules, it would seem either 8710.0450, subpart 2, clause 2, or clause 10 is sufficient - that including both is duplicative.

Under subpart 2, clause 6, would a 20 year veteran teacher from Wisconsin, for example, be required to show they completed a minimum of 12 weeks of student teaching, or would their classroom teaching experience exempt them from having to show they had student teaching experience? I would suggest the actual classroom teaching experience would be sufficient and we wouldn't need this clause for experienced teachers (e.g. 2 years or more).

Subpart 7, Portfolio review, the first sentence excludes out of state licensed teachers from "traditional" prep programs - why? I also presume the portfolio option is available for others who're changing careers (into teaching), and Minnesota licensed teachers who want licensure in an additional field...?

Subpart 7, paragraph A, if licensed teachers from other states must also pass Minnesota's basic skills tests, content and pedagogical tests, why also require college transcripts or syllabi. Also, if needed, why not explicitly ask for MN teaching standards covered by college coursework, rather than just course titles?

Subpart 7, paragraph D, the phrase "student growth on normed assessments" is too limiting. Most, if not all state exams that have been used in compliance with NCLB - and in the future under the reauthorized version are criterion-referenced tests, and not normed. They're tests vis a vis state standards, not in relation to other students. As a result, as currently worded, this provision would exclude results from state standards-based exams.

I hope this is helpful, and please let me know if you'd like me to follow-up.

Thank you for your time!

Jim

Jim Bartholomew
Minnesota Business Partnership
612-370-0840
Sent from my iPad

Doan, Erin (MDE)

From: Joshua Crosson, MinnCAN <joshua.crosson@minncan.org>
Sent: Friday, December 18, 2015 5:20 PM
To: Teaching, Board (MDE)
Cc: Doan, Erin (MDE)
Subject: Response to request for comment on licensure rule changes
Attachments: Comment to the Board Rule.pdf; Comment to the Board Rule.2.pdf

Hello,

Thank you again for taking the time to review MinnCAN's comments on licensing applicants trained, licensed and experienced in other states. The first attachment is our comment. The second attachment is an appendix to the original comment. Please let me know if you have additional comments or questions.

All the best,
Joshua Crosson

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Joshua Crosson
Advocacy Manager

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Dear Executive Director Doan, Chair Bellingham and the members of the Minnesota Board of Teaching:

I would first like to thank you for taking the necessary steps to initiate the rulemaking process, which will modify state standards to obtain licensure for out-of-state and alternatively certified educators, in alignment with recently passed legislation. Minnesota's Board of Teaching is responsible for the development of policy that regulates the issuance of teacher licenses in Minnesota, and, for too long, the Board has failed to create clear expectations or processes for experienced educators who have been trained and/or licensed in other states, making it challenging for them to understand exactly how to obtain the standard, professional teaching license they seek. It must be the goal of this Board to define and implement a clear process through which all candidates trained or licensed in another state understand what they must do to obtain a standard professional license to teach in Minnesota.

It is important that the Board's rules and practices reflect current laws and the intent of the Legislature. In addition to promulgating clear requirements for out-of-state teacher licensure, the Board must also reinstate *licensure via portfolio*. The Board should also implement an appeals process and data collection protocols and evaluate all licensure candidates in a consistent, prompt and fair manner.

Per the education bill Gov. Dayton signed into law in June 2015, the Board-adopted rules must include a number of streamlined provisions. The rules should also reflect legislative intent, system-wide best practices by including several others:

1. Preparation equivalency vs. applicants licensed in other states

To clarify legislative intent, the rules must determine when an out-of-state teacher candidate's application is governed by the requirements of MINN. STAT. 122A.23 subd. 1 or MINN. STAT. 122A.23 subd. 2. Subdivision 1 requires the teacher applicant's out-of-state preparation meet the Board-established criteria for education, experience and professional credentials. Subdivision 2 outlines requirements that applicants licensed in other states must meet to obtain a professional teaching license.

2. Interpret MINN. STAT. 122A.23 subd. 1

For applicants to which MINN. STAT. 122A.23 subd. 1 applies, the Board must develop rules to establish criteria and streamlined procedures to recognize their experience and professional credentials. The Board must also allow a candidate to demonstrate their qualifications based on performance measures and criteria that the Board establishes (See Item I in Appendix).

3. Temporary licenses vs. standard professional licenses

For applicants to which MINN. STAT. 122A.23 subd. 2 applies, the Board must establish standards to determine when the licensing agency will issue a temporary license and when the agency will issue a standard, professional license.

4. Create public material

The Board should regularly issue public material, such as a pamphlet, one-pager, flow chart or information on the Board's website directed toward potential out-of-state applicants that lists, in simplified terms, the requirements and application process for commonly sought licenses under MINN. STAT. 122A.23 subd. 1 and MINN. STAT. 122A.23 subd. 2.

5. Adopt "streamlined procedures" for out-of-state applicants

To comply with Sec. 18, Chapter 3 of the 2015 Special Session, the Board must promulgate rules interpreting MINN. STAT. 122A.23 subd. 1 and define and adopt "streamlined procedures" for applicants trained out-of-state. These streamlined procedures should maximize the ease of applying for licensure and must not add additional licensing burdens that are not present in current statute. Adopting the point-based rubric that the Board developed in collaboration with key stakeholders (highlighted as Item I in Appendix) would provide a clear framework for objectively analyzing applicants, and would help establish a clear, streamlined process.

6. Reinstate the Licensure via Portfolio process

The Board must reinstate *licensure via portfolio* in compliance with MINN. STAT. 122A.21 subd. 2. *Licensure via portfolio* must be open to all teacher candidates, with information on this licensure pathway available to the public in published documents and on all applicable websites. Information should include: what materials are required to apply, how those materials are linked to the assessment of the required competencies for licensure, how each applicant is scored, what constitutes a satisfactory score, an application process timeline and clear notice of the right to appeal any portfolio licensure determination.

7. Define interstate agreements

The Board will be entering into interstate licensure agreements "after determining that the rigor of the teacher licensure or certification requirements in the adjoining state is commensurate with the rigor of Minnesota's teacher licensure requirements." In so doing, the Board must establish rules to define what constitutes "commensurate rigor" and a framework that outlines areas that determine "commensurate rigor." Commensurate rigor should consider licensure, training and professional experience aligned with Board-adopted minimum standards for professional licensure.

8. Train the agencies tasked with issuing licenses

The Board should routinely train staff at the Minnesota Department of Education's Educator Licensing Division and/or any Minnesota agency tasked with issuing teacher licenses. The trainings should include materials aligned to current law and Board-adopted rules including how to analyze the qualifications of out-of-state teacher applicants and how to manage *licensure via portfolio* applications.

9. Create a public appeals process

Board-adopted rules should include a clear public appeals process for all teacher licensure candidates, including Board and candidate responsibilities and timelines. The appeals policy should be included, attached or linked as appropriate in any official determination correspondence or communication from the Board or the MDE Educator Licensing Division. The rules should also include:

- An explanation of an applicant's right to appeal;
- The required steps an applicant must take to invoke their right to appeal;
- The responsiveness of the Board after an applicant invokes their right to appeal;
- The timeline and steps for an appeal;
- The additional materials an applicant may submit, bring or reference in support of their appeal;
- The right to have an appeal decision denied in writing with a full explanation why the Board is denying an appeal; and
- The right to judicial review of any denied appeal in the Minnesota Court of Appeals per MINN. STAT. 14.63 et seq.

10. Allow applicant feedback

To ensure that the intent of the Legislature, which is to improve and streamline out-of-state teacher licensure, is implemented fully, the Board should constantly assess how it is serving out-of-state candidates so that it can further improve its interaction with teacher applicants and clarify the path to a Minnesota license. A feedback instrument to collect information via an online survey on how teacher licensure applicants evaluate their experience interacting with the Board and the MDE Educator Licensing Division would provide data and transparency to the licensure process. To the extent allowed under law, survey data should be made available to the public as part of all correspondence with applicants from the Board and MDE. The survey may include:

- A rating of the Board/MDE's promptness, knowledge and professionalism in interacting with applicants;
- A rating of the accessibility of the Board's materials, website or other public information;
- A rating of the applicants' satisfaction with the overall licensure process;
- An opportunity for applicants to freely write to express any specific concerns related to that individual rating; and
- An opportunity for applicants to leave contact information for the Board to follow-up with any concerns.

11. Collect important data

Consistent with reporting requirements, the Board must collect important data that gives the public a clear understanding of the number of teacher applicants approved, denied or counseled out of applying for Minnesota licensure. The data must be made public and include:

- The number of applicants that started an application for a standard license (calculated by registered MDE User Account applicants using the online application system);
- The number of applicants who submitted a completed or partially completed application for a standard professional license;
- The number of applicants who had a final determination made. Of those, what percent were given a standard license, what percent were given a temporary, limited, variance or other non-standard professional license and what percent were denied a license. Data must be disaggregated by race;
- Of those where a final determination was something other than a standard license, the number of applicants who appealed the decision. Data must be disaggregated by race;
- The number of applicants who have waited more than 180 days for a final determination;
- Of those applicants who have waited more than 180 days, the reasons for the delay in making a final determination.

12. Release Board of Teaching Annual report

The Board of Teaching should, in collaboration with the Minnesota Department of Education, publicly release an annual report providing comprehensive information on licensure in Minnesota. At a minimum, the report should include:

- Data on the number of appeal cases opened, opened for more than 180 days, resolved in favor of the appealing applicant, average length of opening and closing appeals cases, applicant feedback around appeals and identified areas of concern and recommendations to improve the appeals process;
- Data on the number of completed or partially completed applications for licensure, as required above;
- A summary and data from the Applicant Feedback Survey and recommendations to improve the application process as presented by the Feedback Survey.

13. Align rules with current law

It is critical that the Board use the rulemaking process to clarify current law where statute is ambiguous. Current statute requires the Board to clarify terms such as “similar content area” and “similar license” with the goal to create a clear process for teacher applicants with diverse training and professional experience backgrounds. The Board must refrain from creating additional requirements for licensure or vague terms such as “content specific teaching methods,” that are neither defined in law or rule (See Item II in Appendix).

The Board has the opportunity to make the licensure process clearer and stronger, ensuring that well-prepared educators have a more streamlined path to the classroom. We appreciate the Board's review of our comments, and welcome any follow-up questions.

Sincerely,

A handwritten signature in black ink that reads "Daniel Sellers". The signature is written in a cursive style with a long, sweeping tail on the letter "s".

Daniel Sellers
Executive Director
MinnCAN

Appendix

Item I

Licensure Rubric for Applicants Licensed, Trained and Practicing in Other States (revised Dec. 2015 to align with sec. 18, Chapter 3 of the 2015 Special Session)

<i>Issue Area</i>	<i>Stipulations</i>	<i>Points</i>	<i>Type of Evidence Provided</i>	<i>Points Awarded</i>
Completion of a state-approved teacher preparation program	Student teaching, student teaching equivalent, completion of field-specific methods courses, OR 2 or more years of teaching experience in similar field and scope	Required		
	Teacher training or Masters Program completed in similar field or scope	Required		
	NCATE/TEAC accredited at time of completion?	10		
Total points for area:				
Teaching experience as teacher of record in similar licensure field and scope sought in MN	< 1 Year	0		
	1-3 Years	10		
	4-10 Years	15		
	11+ Years	20		
Total points for area:				
Depth of content knowledge	Major in content area	20		
	Minor in content area	10		
	Progress towards Masters or Doctoral Degree	0.5/per credit hour		
	Masters or Doctoral Degree	15/per degree		
Total points for area:				

Depth of content methods or general pedagogy	National Board Certification	30		
	Completion of edTPA at or above MN standard	20		
	Coursework in similar field	5/semester credit		
	Masters or Doctoral Degree	20/per degree		
	Continuing Education Units	5/unit hours		
	State/district designated leadership	10		

Total points for area:

Subject-specific professional development, recognition, and contribution to the field	Participation in state or district approved induction program	10/year		
	Professional publication or peer-review of publications	5/publication as teacher of record		
	Presentations, curriculum development, faculty	10		
	Awards within the last 10 years	5/award		
	Service/leadership in professional organizations	5/leadership term		

Total points for area:

Classroom performance	Documented student growth on normed assessments	5/year		
	Documented effectiveness on local evaluation	5/year		

Total points for area:

Item II

Streamlining licensure for out-of-state teachers

An in-depth analysis and comparison of HF1 (current law) and the Board of Teaching's working draft of proposed rules

Standard Licensing Requirements in Statute	
For teachers trained in Minn. (122A.18)	For teachers trained/licensed in other states (122A.23)
<ul style="list-style-type: none"> • Subject to background checks • Pass Board-required exams • Complete a Board-approved college or university teacher preparation program that includes a common core of teaching knowledge including, but not limited to, providing instruction to English learners, standards established by the 1992 document "model standards for beginning teacher licensing and development", research-based best practices in reading instruction, and digital and blended learning • Complete human relations requirements (can be waived through Peace Corps, VISTA, or Teacher Corps) 	<ul style="list-style-type: none"> • Subject to background checks • Pass Board-required exams • Holds a baccalaureate degree • Holds or held a similar out-of-state teaching license with a scope no more than 2 years from a Minn. license • Complete a teacher preparation program that includes field-specific teaching methods, student teaching or equivalent experience, or at least two years of teaching experience as the teacher of record in a similar licensure field • Complete Board-required human relations preparation
<ul style="list-style-type: none"> • Applicants may submit a portfolio to present professional experiences for Licensure via Portfolio 	

H.F. 1 section	H.F. 1 language	Description	Board of Teaching draft rules	Suggestions to Board of Teaching
25.6	"The Board must adopt rules by Jan. 1, 2016, to license applicants."	Board must adopt rules for out-of-state and alternative certification licensure law changes in a timely manner.	Process: Initial request for public comment submitted Oct. 27, 2015. Currently, not on track to comply with law.	Clarify current timeline. If not on track to meet Jan. 1 deadline, specify when new rules will be finalized.
25.9;	"The rules must adopt	Law allows teachers with	Not included in current draft	Add clear language to rules,

H.F. 1 section	H.F. 1 language	Description	Board of Teaching draft rules	Suggestions to Board of Teaching
25.14; 33.12; 33.19; 33.27	criteria for determining a 'similar content field' and 'similar licensure area.'	"similar" licensure fields to obtain a Minn. license, rather than "same" as previously required. Board must draft rules to define the term "similar."		aligned with legislative intent of ensuring that candidates are not denied licensure based on semantic cross-state licensure differences.
22.10; 28.21; 33.18; 33.24	"four temporary, one-year teaching licenses to an otherwise qualified candidate"	Law requires the Board to provide up to four, one-year teaching licenses to teachers who have not passed the skills exam or have not completed the field-specific teaching methods, student teaching, or teacher experience requirement.	Draft rules cap temporary licenses below the law's required cap of four one-year teaching licenses: <ul style="list-style-type: none"> • Initial professional license capped at one, one-year license • Limited License capped at three, one-year licenses • Variance capped at three, one-year licenses 	Make caps for all eligible licenses compliant with law allowing for four temporary, one-year teaching licenses.
30.9; 34.9	The Board may grant two-year provisional licenses to educators in a shortage area.	Law creates pathway to a two-year provisional license for teachers in shortage areas. Law does not cap the number of these licenses.	Caps Provisional licenses to three two-year licenses	Remove cap for Provisional Licenses in shortage areas.
30.11	Defines shortage area as, "an inadequate supply of licensed personnel in a given licensure area as determined by the Commissioner."	Clearly defines the term "shortage area"	Removes and replaces the definition of "shortage area," which is clearly defined in law.	Ensure definition of shortage area in rules is consistent with definition in statute.
31.23	Allows candidates to apply for licensure via portfolio through the	Adds review deadline to law to emphasize that Licensure via Portfolio must be	Establishes Portfolio Review process (Subpart 3c) for teachers who have not been referred by a	Current rule is too narrow. Must allow all prospective teachers have access to

H.F. 1 section	H.F. 1 language	Description	Board of Teaching draft rules	Suggestions to Board of Teaching
	Department and requires the Board to notify candidates within 90 days after the portfolio is received of application results.	available to teacher applicants, and that Board/MDE to not have authority to discontinue the process.	local teacher prep program or completed alternative or nonconventional programs.	Licensure via Portfolio. Subpart 3c implies that alternatively certified teachers are likely not provided access to standard licenses, which is out of line with intent of law. Portfolio licensure should be one of many pathways.
31.35	Candidate may resubmit a revised portfolio at any time and MDE must approve or disapprove the portfolio within 60 days of receiving it	Law gives candidates ability to submit a revised portfolio at any time. Requires MDE to respond within 60 days.	No rules reflect this law in the Licensure via Portfolio section (Subpart 3c) nor the appeals section (Subpart 4)	Add language to rules to reflect this portion of statute. Provide information on how the Board/MDE will accept portfolios, including portfolio criteria and timelines.
32.21	<p>“The diploma or degree must be granted by virtue of completing coursework in teacher preparation as preliminary to the granting of a diploma or a degree of the same rank and class”</p> <p>(Removes the ‘essentially equivalent’ clause)</p>	Law requires the Board to provide a license to teachers who complete coursework in the same rank and class as determined by the Board. Coursework for licensure are not required to be equivalent to a Minn. postsecondary institution as determined by a teacher preparation program.	Applicants must complete a Minn. program, or a program aligned with either the Minn. Standards of Effective Practice or the Core Teaching Standards of the Interstate Teacher Assessment and Support Consortium, plus pass required exams, have content-specific teaching methods preparation, human relations/cultural diversity training, reading instruction training, a major in content field for secondary licensure, and completion of a 12-week supervised, evaluated, field-based	<p>Allow out-of-state teachers to complete programs with pedagogy preparation aligned to other high-quality standards, such as:</p> <ul style="list-style-type: none"> • National Board Standards • NCATE • TEAC <p>Clarify use of phrase “content-specific teaching methods.” Where is this required in current law? What is its definition? How is it different from field-specific teaching</p>

H.F. 1 section	H.F. 1 language	Description	Board of Teaching draft rules	Suggestions to Board of Teaching
			classroom experience.	methods, which is in current law?
33.4; 33.14;	Candidates must complete: 1. Field specific teaching methods; or 2. Student teaching; or 3. 2 years of teaching experience as the teacher of record in a similar field	Law allows two years of teaching experience to fulfill the field-specific methods and student teaching requirements.	Rules fail to implement new language by requiring that teachers submit "Documentation of the successful completion of a supervised, evaluated, field-based classroom experience of 12 or more weeks," (Subpart 2f) with no allowance for experience.	Clearly state and define that teacher candidates must complete field-specific methods, student teaching, OR 2 years as the teacher of record to comply with current law.
33.7	"The Board of Teaching may issue a standard license on the basis of teaching experience and examination requirements only."	This provision clarifies that the Board may issue licenses based on experience and exams alone.	Allows applicants to use Licensure via Portfolio to fulfill this requirement.	Create a published, transparent process for Licensure via Portfolio.
34.1	"The Board of Teaching must issue a restricted teaching license only in the content field or grade levels specified in the out-of-state licenses to an applicant."	Law allows teachers who do not currently qualify for a standard Minn. license to be granted unlimited temporary 2-year licenses. The licenses would be restricted in scope, meaning, for example, a teacher who holds a 9-12 math license could only teach in grades 9-12, and would not qualify for a full, Minn. 5-12 math license unless they complete coursework to expand the scope.	Provides Restricted Licenses for applicants who hold a full professional license from another state and meet Subpart 2 requirements.	State that these licenses are 2-year licenses without a cap.

Doan, Erin (MDE)

From: Roz Peterson <Rep.Roz.Peterson@house.mn>
Sent: Monday, December 28, 2015 12:31 PM
To: Teaching, Board (MDE)
Subject: Rules for out-of-state and alternatively certified educators - comments

December 28, 2015

Dear Executive Director Doan, Chair Bellingham and the members of the Minnesota Board of Teaching,

Thank you for taking the necessary steps to initiate the rulemaking process for out-of-state and alternatively certified educators. I urge your agency to align these rules with current law, focusing on the changes made during the 2015 legislative session. It must be the goal of this Board to define and implement a clear process through which all candidates trained or licensed in another state understand what they must do to obtain a standard professional license to teach in Minnesota.

It is important that the Board's rules and practices reflect current laws and the intent of the Legislature. In addition to promulgating clear requirements for out-of-state teacher licensure, the Board must also reinstate licensure via portfolio, a pathway to licensure that the Legislature has required for several years and that was previously an effective alternative for many skilled educators.

Per the education bill Gov. Dayton signed into law in June 2015, the Board-adopted rules must include a number of streamlined provisions. As the rules are developed, the Legislature expects to see them reflect all of the following:

1. Preparation equivalency vs. applicants licensed in other states

To clarify legislative intent, the rules must determine when an out-of-state teacher candidate's application is governed by the requirements of MINN. STAT. 122A.23 subd. 1 or MINN. STAT. 122A.23 subd. 2. Subdivision 1 requires the teacher applicant's out-of-state preparation meet the Board-established criteria for education, experience and professional credentials. Subdivision 2 outlines requirements that applicants licensed in other states must meet to obtain a professional teaching license.

2. Interpret MINN. STAT. 122A.23 subd. 1

For applicants to which MINN. STAT. 122A.23 subd. 1 applies, the Board must develop rules to establish criteria and streamlined procedures to recognize their experience and professional credentials. The Board must establish clear performance measures and criteria that allow a candidate to demonstrate their qualifications based on performance.

1. Temporary licenses vs. standard professional licenses

For applicants to which MINN. STAT. 122A.23 subd. 2 applies, the Board must establish standards to determine when the licensing agency will issue a temporary license and when the agency will issue a standard, professional license.

4. Adopt “streamlined procedures” for out-of-state applicants

To comply with Sec. 18, Chapter 3 of the 2015 Special Session, the Board must promulgate rules interpreting MINN. STAT. 122A.23 subd. 1 and define and adopt “streamlined procedures” for applicants trained out-of-state. These streamlined procedures should maximize the ease of applying for licensure and should not add additional licensing burdens that are not present in current statute.

6. Reinstate the Licensure via Portfolio process

The Board must reinstate licensure via portfolio in compliance with MINN. STAT. 122A.21 subd. 2. Licensure via portfolio must be open to all teacher candidates, with information on this licensure pathway available to the public in published documents and on all applicable websites.

7. Define interstate agreements

The Board will be entering into interstate licensure agreements “after determining that the rigor of the teacher licensure or certification requirements in the adjoining state is commensurate with the rigor of Minnesota’s teacher licensure requirements.” In so doing, the Board must establish rules to define what constitutes “commensurate rigor” and a framework that outlines areas that determine “commensurate rigor.” Commensurate rigor should consider licensure, training and professional experience requirements aligned with Board-adopted minimum standards for professional licensure.

8. Align rules with current law

It is critical that the Board use the rulemaking process to develop standards clearly aligned with statute, offering additional detail and definition where warranted that is aligned with legislative intent. Current statute requires the Board to clarify terms such as “similar content area” and “similar license” with the goal to create a clear process for teacher applicants with diverse training and professional experience backgrounds. The Board must refrain from creating additional requirements for licensure or vague terms such as “content specific teaching methods,” that are neither defined in law or rule.

The Board has the opportunity to make the licensure process compliant with current law and legislative intent. I encourage the Board to welcome well-prepared educators through more streamlined paths to the classroom. I appreciate the Board’s work on this very important issue, and would be happy to offer additional feedback.

Sincerely,

Rep. Roz Peterson
District 56B

Roz Peterson
State Representative 56B Burnsville-Lakeville

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Doan, Erin (MDE)

From: Bill Kautt <bkautt@mnmsba.org>
Sent: Tuesday, December 29, 2015 3:39 PM
To: Doan, Erin (MDE); Liuzzi, Alex (MDE)
Cc: Denise Dittrich; Gary Lee; Kirk Schneidawind
Subject: Rule 8710.0450 draft

Erin and Alex:

Some thoughts while comparing the draft rule handed out at the Standards and Rules Committee meeting to the existing statutes.

1. M.S. 122A.09, Subd. 4., (b) states: *“(b) The board must require all candidates for teacher licensure to demonstrate a passing score on a board-adopted skills examination in reading, writing, and mathematics, as a requirement for initial teacher licensure, except that the board may issue up to four temporary, one-year teaching licenses to an otherwise qualified candidate who has not yet passed the board-adopted skills exam.”* The draft rule Subpart 3a, A. states: **“Classroom teachers with an Initial Professional License Renewal must evidence progress toward a Full Professional License each year requesting a renewal of the Initial Professional License. Initial Professional Licenses are only renewable three times.”** First the word, “Renewal,” printed in red should probably be deleted because I believe the statement is referring to the license, not the renewal, and the word, “License,” in the second sentence should become plural as indicated with the addition of the red “s.” Then, if the only reason for the issuance of the Initial Professional License is the fact the individual has not passed the skills exam, how does he/she demonstrate progress toward a Full Professional License and is not the proposed language in conflict with the cited legislation?
2. M.S. 122A.09, Subd. 4., (b) also states: *“The requirement to pass a board-adopted reading, writing, and mathematics skills examination does not apply to nonnative English speakers, as verified by qualified Minnesota school district personnel or Minnesota higher education faculty, who, after meeting the content and pedagogy requirements under this subdivision, apply for a teaching license to provide direct instruction in their native language or world language instruction under section 120B.022 subdivision 1.”* Should this exception be included in this proposed rule so out-of-state trained teachers are aware of this exception.
3. M.S. 122A.09, Subd. 4., (o) states: *“(o) The board must adopt rules by January 1, 2016, to license applicants under sections 122A.23 and 122A.245. The rules must permit applicants to demonstrate their qualifications through the board's recognition of a teaching license from another state in a similar content field, completion of a state-approved teacher preparation program, teaching experience as the teacher of record in a similar licensure field, depth of content knowledge, depth of content methods or general pedagogy, subject-specific professional development and contribution to the field, or classroom performance as determined by documented student growth on normed assessments or documented effectiveness on evaluations. The rules must adopt criteria for determining a “similar content field” and “similar licensure area.”* The proposed draft does not establish criteria for a “similar content field” or “similar licensure area.”
4. M.S. 122A.18, Subd. 2., (b) states: *“(b) The board must require a candidate for teacher licensure to demonstrate a passing score on a board-adopted examination of skills in reading, writing, and*

mathematics, before being granted an initial teaching license to provide direct instruction to pupils in prekindergarten, elementary, secondary, or special education programs, except that the board may issue up to four temporary, one-year teaching licenses to an otherwise qualified candidate who has not yet passed a board-adopted skills exam. At the request of the employing school district or charter school, the Board of Teaching may issue a restricted license to an otherwise qualified teacher not passing or demonstrating a passing score on a board-adopted skills examination in reading, writing, and mathematics. For purposes of this section, the restricted license issued by the board is limited to the current subject or content matter the teacher is employed to teach and limited to the district or charter school requesting the restricted license. If the board denies the request, it must provide a detailed response to the school administrator as to the reasons for the denial.” The current proposed rule draft does not address the highlighted portion of the statute. Perhaps, the board plans to address this particular situation elsewhere in its rules. If that is the case, two things need to be addressed. One, out-of-state applicants need to be made aware of this provision somehow, and two, the length of this particular “restricted license” issued by the board needs to be stated somewhere in the rules.

5. Because M.S. 122A.18, Subd. 8 requires the board to request a criminal history background check for all initial applicants for licensure, should the proposed rule reference the necessary background check someplace in the rule?

Bill Kautt
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Doan, Erin (MDE)

From: Daniel Sellers <daniel.sellers@minncan.org>
Sent: Friday, January 01, 2016 2:45 PM
To: Teaching, Board (MDE); Doan, Erin (MDE); Bellingham, John (MDE)
Cc: Joshua Crosson
Subject: MinnCAN addendum to comment on Board of Teaching Rule
Attachments: BoT - Comment to the Board Rule_Addendum MinnCAN 160101.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Executive Director Doan, Chair Bellingham and the members of the Minnesota Board of Teaching,

As an addendum to our previously submitted comments suggesting additions and changes to the Board's draft rules, MinnCAN submits the attached comments to the draft rules sent to me on December 18, 2015 at 3:31 pm by Executive Director Erin Doan.

As I previously mentioned, we share our gratitude for your efforts in taking the first steps toward creating greater clarity and certainty in the application process.

If you have any questions about our comments, please do let me know. I would be happy to help the Board understand our concerns and comments, and the legal basis for them.

With Appreciation,
Daniel Sellers

--
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Dear Executive Director Doan, Chair Bellingham and the members of the Minnesota Board of Teaching,

As an addendum to our previously submitted comments suggesting additions and changes to the Board's draft rules, MinnCAN submits the following comments to the draft rules sent to me on December 18, 2015 at 3:31 pm by Executive Director Erin Doan.

Comment 14 - Procedure

We have concerns that the Board might not have made sufficient efforts to make the community aware of its draft rules. We are aware of a number of interested parties that were either unaware the Board was drafting rules, or that they were unsure what version is being considered. On several occasions we and others have asked to be made aware of new draft rules but have not always been made aware of new drafts in a timely manner. This is discouraging and disappointing.

Comment 15 – Subpart 2(B)

The organizational structure of 8710.0450, subpart 2(B) is confusing and difficult to understand. As written, it seems to imply that there are 8 independent requirements in for teachers licensed in other states. 122A.23, subdivision 2 does not indicate that there should be 8 independent requirements.

The language of Draft 8710.0450, subp B. 2 is particularly confusing. It reads:

2. Completed a teacher preparation program approved in another state that includes pedagogy preparation which aligns to either the Minnesota Standards of Effective Practice or the Core Teaching Standards of the Interstate Teacher Assessment and Support Consortium standards, as evidenced by:
 - a. Signed recommendation form from the teacher preparation program or

It is not clear what the "or" is referring to as there is no (B)(2)(b).

Comment 16 – Subpart 2(B)(1)

This paragraph reads:

1. Holds the minimum of a bachelor's degree from a college or university located in the United States that is regionally accredited by the Higher Learning Commission or by the

regional association for accreditation of colleges and secondary schools; as evidenced by a teacher prep transcript

The requirement that the transcript be evidence by “a teacher prep transcript” is inappropriate. First, it is unclear what a “teacher prep transcript” is and how that might differ from a standard college or university transcript. Second, there is no requirement that the out-of-state applicant have a “teacher prep transcript.” The statute requires only that the applicant have completed a “teacher preparation program approved by the issuing state.” That may or may not include a “teacher prep transcript.” We would suggest that that language simply be removed. The new paragraph should read:

1. Holds the minimum of a bachelor’s degree from a college or university located in the United States that is regionally accredited by the Higher Learning Commission or by the regional association for accreditation of colleges and secondary schools; ~~as evidenced by a teacher prep transcript~~

Comment 17 – Subpart 2(B)(2)

This paragraph reads:

2. Completed a teacher preparation program approved in another state that includes pedagogy preparation which aligns to either the Minnesota Standards of Effective Practice or the Core Teaching Standards of the Interstate Teacher Assessment and Support Consortium standards, as evidenced by:
 - a. Signed recommendation form from the teacher preparation program or

This paragraph is completely contradictory to the statutory requirements of Minn. Stat. § 122A.23, subdivision 2(a) and should be stricken entirely. The statute does not include a requirement for “pedagogy preparation” and its addition would violate established law and statute.

The statute is clear that in addition to a college degree, the applicant need only demonstrate that her out-of-state teacher preparation program either: (i) included field specific teaching methods, student teaching, or that the teacher has equivalent experience; or (ii) that the applicant has 2 years of experience teaching in a “similar licensure field.” The statute’s explicit exclusion of “pedagogy preparation” precludes the Board from adding the requirement.

Moreover, the requirement that any aspect of the preparation program “aligns to either the Minnesota Standards of Effective Practice or the Core Teaching

Standards of the Interstate Teacher Assessment and Support Consortium standards” is similarly contradictory to the explicit requirements of the statute.

Minn. Stat. § 122A.23, subpart 2 never included any requirement that the out-of-state preparation program be “essentially equivalent” to Minnesota’s and, in 2015, that requirement was explicitly stricken from subpart 1. The statute is clear that the out-of-state program need only be approved by the state issuing the license. Imposing Minnesota’s standards is contrary to law. We suggest that the entire paragraph be stricken.

Finally, as noted above, it is difficult to understand whether (B)(2) is an additional or independent requirement from (B)(3). There should not be a (B)(2)(a) ending in an “or” if there is no (B)(2)(b).

Comment 18 – Subpart 2 (B)(3)

This paragraph reads:

3. Completed a field-based classroom experience of 12 or more weeks teaching the subject of intended licensure that included supervision and evaluation from a qualified supervisor/mentor as evidence by a teacher preparation transcript.
 - a. This requirement may be substituted by verified evidence of two years of successful teaching experience aligned to the subject and scope of the intended MN licensure.

Our primary concern with this paragraph is that it seems to suggest that two years of teaching satisfies only the requirement of student teaching. As noted above, the statute is clear that the applicant can have “equivalent experience” to satisfy the requirements that the preparation program include “field-specific teaching methods, [and] student teaching.” The statute is also clear that 2 years of teaching experience “as the teacher of record in a similar licensure field” satisfies all requirements related to the teacher preparation program in Minn. Stat. § 122A.23, subd.2 (a). The draft rule is not consistent with this requirement.

It is also concerning that the draft rule requires out-of-state teachers to complete 12 or more weeks of student teaching when many in-state programs require only 6 weeks. It would be inconsistent to define student teaching one way for in-state applicants and another for out-of-state applicants.

Moreover, the phrase “verified evidence” in 3(a) is confusing and meaningless. It is unclear how evidence becomes “verified” or why compelling evidence would be insufficient.

As noted above, this paragraph also includes a requirement that the student teaching be “evidence [sic] by a teacher preparation transcript.” Again, it is

unclear what a teacher preparation transcript is, and it is not required by statute. This language should be removed or made consistent with language below (see next section, referring to “other certified program documentation.”

Comment 19 – Subpart 2(B)(4)

This paragraph reads:

4. Completion of an instructional methods course aligned to the content area and scope of the intended field of licensure as evidenced by course on college transcript or other certified program documentation
 - a. This requirement may be substituted by verified evidence of two years of successful teaching experience in the content and scope of intended MN licensure,
 - b. A one-year mentorship induction program with a qualified mentor aligned to the Minnesota Standards of Effective Practice and Minnesota Graduation Requirements, or
 - c. A passing score as determined by the Board of Teaching on the edTPA aligned to the scope and content of intended MN licensure.

Again, the structure of Subpart 2(B) seems to suggest that this paragraph is intended to be a necessary requirement for all out-of-state applicants. However, statute makes clear that it is not. An out-of-state applicant can satisfy all requirements related to her preparation program by simply having 2 years of teaching experience “as the teacher of record in a similar licensure field.”

This paragraph also for the first time adds the language that the evidence can be either a “college transcript” or “other certified program documentation.” For the first time, the paragraph correctly recognizes that the experience need not be reflected on a formal transcript. As noted above, the other paragraphs should be modified to be consistent.

This paragraph is also confusing because it is unclear whether the requirement of a transcript or other documentation is in addition to one of the requirements in (a), (b), and (c), or whether it is an alternative. The statute makes clear that the preparation program must include “field-specific teaching methods,” but it also makes clear that the Board must defer to the issuing state. We suggest the paragraph be re-written as:

4. Completion of an instructional methods course aligned to the content area and scope of the intended field of licensure. This

can be satisfied by one of the following: as evidenced by course on college transcript or other certified program documentation

- a. A college transcript or other documentation showing the preparation program included field-specific teaching methods;
- b. Two years of successful teaching experience in the content and scope of intended MN licensure;
- c. A one-year mentorship induction program with a qualified mentor aligned to the Minnesota Standards of Effective Practice and Minnesota Graduation Requirements; or
- d. A passing score as determined by the Board of Teaching on the edTPA aligned to the scope and content of intended MN licensure.

Comment 20 – Subpart 2(B)(5)-(7)

These paragraphs list the testing necessary for out-of-state applicants. While we take no issue with the number or subjects of the testing, we think it would be helpful to cite the specific tests required for each license. This can be done either in the rule itself, or by reference to a website or other public document. The Board should endeavor to make the application process as self-evident as possible.

Comment 21 – Subpart 2(B)(8)

This paragraph reads:

8. Completion of a human relations course or board approved alternative that included instruction in Culturally Responsive Teaching strategies and cultural competence, as evidenced by teacher preparation transcript, or by attestation of the preparation program at the time of application for Minnesota licensure.

This paragraph is confusing. It is unclear how evidence of a human relations preparation would be established. The paragraph seems to suggest that the Board would accept “attestation of the preparation program,” but it is unclear what they would need to attest to. The terms used in this paragraph are too vague and general to provide the necessary guidance and we have seen applicants subjected to a wide variety of interpretations. While we support this requirement in general, it would be helpful to finally get some clarity on what the Board is requiring.

Comment 22 – Subpart 2b

This paragraph concerns restricted licenses for out-of-state applicants. As an initial matter, we would encourage the Board to simply continue subpart

numbering rather than trying to have a “Subpart 2”, “Subpart 2a”, and “Subpart 2b.” This can often lead to substantial confusion. The Board should either call them “Subpart 2,” “Subpart 3,” “Subpart 4”, or simply make the additional paragraphs within Subpart 2.

Otherwise, we simply adopt our comments noted above.

Comment 23 – Subpart 3

This paragraph reads:

Subpart 3: INITIAL PROFESSIONAL TEACHING LICENSE: Applicants trained in other states who do not meet the requirements for a Full Professional Teaching License as listed in Subpart 2,

- A. shall be issued a 1-year, Initial Professional Teaching License, renewable 3 times, if the applicant meets requirements in Subpart 2B items 1 through 3 and needs to complete Minnesota statutory requirements before receiving a Full Professional License.
 1. Applicants for secondary licensure (in subjects excluding SPED) must evidence depth of content knowledge before receiving an Initial Professional Teaching License, evidenced by either:
 - a. having a minimum of 24 semester credits of coursework aligned to the content of intended licensure or
 - b. receive a passing score as determined by the Board of Teaching on a content exam last adopted by the Board of Teaching in the content of intended licensure.

As an initial matter, for all the reasons noted above, we take issue with requiring out-of-state applicants for a temporary teaching license to satisfy the requirements currently listed in Subpart 2B items 1 through 3. Those requirements are simply not consistent with the statute.

Moreover, Minn. Stat. § 122A.23, subdivision 2 is clear that applicants for temporary licenses do not have to meet the requirements of Minn. Stat. § 122A.23, subdivision 2(a). For example, Minn. Stat. § 122A.23, subdivision 2(e) is clear that the Board must issue temporary licenses to teachers who meet other requirements but have “not completed field-specific teaching methods or student teaching or equivalent experience.” As written, the Board’s current rule entirely ignores this statutory right of applicants.

Paragraph Subpart 3(a)(1) is also entirely contradictory to the statutory requirements. There is nothing in the statute that allows the Board to impose additional burdens on applicants seeking "secondary licensure." It should be stricken in its entirety.

Comment 24 – Subpart 3a

This paragraph reads:

- A. Classroom teachers with an Initial Professional Licensure Renewal must evidence progress toward a Full Professional License each year requesting a renewal of the Initial Professional License. Initial Professional License are only renewable three times.
 1. If Subpart 2B.4 is not complete, this criteria must be completed during the first year of the Initial license either through completed a methods course or completing a year-long mentorship program aligned to the Board-adopted Standards of Effective Practice and the Minnesota Graduation Requirements.

Again, as with Subpart 2, the numbering of this subpart is confusing and unnecessary.

With respect to the substance of the proposed paragraph, it is contradictory to the statutory requirements and must be stricken. There is nothing in the statute requiring teachers to "evidence progress toward a Full Professional License each year." An applicant has a statutory right to 4 temporary licenses and no requirement to do anything more or different. For example, a teacher would be perfectly within her statutory rights to accept 4 temporary licenses and then retire from the profession. The Board cannot impose additional requirements on the issuance of temporary licenses that do not have statutory support.

Moreover, it is entirely unclear what would constitute "progress" and it cannot be left entirely to the Board's discretion. For example, an applicant has every right to spend a year studying for the MTLEs before applying for her second temporary license. The Board cannot determine what it believes to be sufficient progress.

For all the same reasons, Subpart 3a(A)(1) is contrary to law and should be stricken. There is no requirement that an applicant complete field-specific teaching methods within the first year. In fact, the statute is clear that they are entitled to up to 4 limited licenses while they work towards the completion of the field-specific teaching methods requirement. *See* Minn. Stat. § 122A.23, subpart 2(e).

Comment 25 – Subpart 5(A)

This paragraph reads:

A. Trained Teachers: Trained teachers may apply for a Professional License through portfolio review for the requirements of Subpart 2 *cited as not met* in the initial review of their MN licensure application if:

1. Applicant holds the minimum of a bachelor's degree from a college or university located in the United States that is regionally accredited by the Higher Learning Commission or by the regional association for accreditation of colleges and secondary schools; as evidenced by a teacher prep transcript,
2. completed a teacher preparation program, and
3. applied for Minnesota licensure and did not successfully document all requirements in Subpart 2B or 3A for Full or Initial Professional Licensure in MN.

This paragraph is contradictory to the law and must be entirely stricken. As written, it makes at least two assumptions contradictory to the requirements of Minn. Stat. § 122A.21. First, it implies that teachers can only apply for licensure via portfolio *after* they have applied and been denied under Minn. Stat § 122A.23 and the requirements of this rule. That is not the law. Licensure via portfolio is an entirely independent method for teachers to obtain licensure. They do not have to first apply under § 122A.23, or any other statute.

Second, the paragraph implies that only out-of-state teachers can apply for licensure via portfolio. Again, that is not the law. Teachers trained in Minnesota have no obligation to satisfy any of the requirements of Minn. Stat. § 122A.23 whether they apply through traditional means or through portfolio. Restricting licensure via portfolio to teachers who first have a determination that they have not satisfied some of the requirements of this rule is not consistent with the law.

Imposing such a requirement would not only dramatically increase the cost and time of applications, but it would contravene applicants' statutory right to an administrative appeal. Once an applicant is denied a license they have the right to seek administrative review. The Board cannot force them to choose between administrative review and an application via portfolio.

Comment 26 – Subpart 5(B)

This paragraph reads:

- B. Not Completed a Teacher Preparation Program: Applicants who have not completed a teacher preparation program may apply for a Professional License through portfolio review if:

1. Applicant holds the minimum of a bachelor's degree from a college or university located in the United States that is regionally accredited by the Higher Learning Commission or by the regional association for accreditation of colleges and secondary schools; as evidenced by a teacher prep transcript.

This paragraph helps illustrate the inappropriateness of Subpart 5(A). It is absurd to create a rule that creates greater burdens on trained teachers than untrained teachers. Minn. Stat. § 122A.21 does not limit licensure via portfolio to applicants who have not completed a preparation program and the Board does not have the discretion to impose the requirement.

Moreover, as repeatedly noted above, it is contradictory to assume applicants "who have not completed a teacher preparation program" will be able to any "evidence by a teacher prep transcript."

Comment 27 – Subpart 5(C)

This paragraph reads:

- C. Portfolio Review Process: Applicants must provide documentation to evidence meeting requirements of Subpart 2B for the licensure area being sought. Sources of evidence include:
 1. transcript and/or syllabi of college coursework,
 2. subject-specific high quality professional development (as defined by section 9101, Part 34 of ESEA),
 3. professional contributions to the field,
 4. classroom performance as determined by student growth on normed assessments, or
 5. documented effectiveness on performance evaluation.

The portfolio process is intended to be an entirely independent method for obtaining licensure. Simply requiring applicants to satisfy all of the requirements of Minn. Stat. § 122A.23, subpart 2 is not consistent with the statute. Such a requirement effectively deprives applicants of a portfolio process. This requirement is contrary to the law and must be stricken.

Comment 28 – Minn. Stat. § 122A.21

Minn. Stat. § 122A.21 requires the Board to develop rules to explain how applicants "can use licensure via portfolio to obtain an initial licensure or to add a licensure field." Nothing in this proposed rule makes any progress toward that mandate. The Board must promulgate rules that make clear how teachers can gain initial or additional licensure.

Comment 29 – Minn. Stat. § 122A.21

Minn. Stat. § 122A.21 provides that the Board “must notify a candidate who submits a portfolio under paragraph (b) or (c) within 90 calendar days after the portfolio is received whether or not the portfolio was approved.” Nothing in the proposed rules addresses this statutory requirement.

Comment 30 – Minn. Stat. § 122A.23, subdivision 1

Minn. Stat. § 122A.23, subdivision 1 states, in part:

[T]he Board of Teaching must establish criteria and streamlined procedures by January 1, 2016, to recognize the experience and professional credentials of the person holding the out-of-state diploma or degree and allow that person to demonstrate to the board the person’s qualifications for receiving a Minnesota teaching license based on performance measures the board adopts by January 1, 2016.

It is unfortunate that this statutory deadline has not passed and the Board has not taken any steps to comply with the statutory mandate.

It is also difficult to offer complete comments on this draft rule without having any insight into if or how the Board will comply with the legislative mandate of Minn. Stat. § 122A.23, subdivision 1. The creation of streamlined procedures would be beneficial to all out-of-state applicants and would help define the requirements of this Rule. The Board’s decision not to include such rules is disappointing and in contradiction of clear legislative mandate.

As mentioned before, we stand ready to work with the Board to develop “streamlined procedures.”

Comment 31 – Minn. Stat. § 122A.09, Subdivision 4(o)

This paragraph states:

The board must adopt rules by January 1, 2016, to license applicants under sections 122A.23 and 122A.245. The rules must permit applicants to demonstrate their qualifications through the board's recognition of a teaching license from another state in a similar content field, completion of a state-approved teacher preparation program, teaching experience as the teacher of record in a similar licensure field, depth of content knowledge, depth of content methods or general pedagogy, subject-specific professional development and contribution to the field, or classroom performance as determined by documented student growth on normed assessments or documented effectiveness on evaluations. The rules must adopt criteria for determining a "similar content field" and "similar licensure area."

Minn. Stat. § 1223A.09, subdivision 4(o) similarly mandates that the Board must adopt new rules allowing applicants to demonstrate their qualification through:

- a teaching license from another state in a similar content field,
- completion of a state-approved teacher preparation program,
- teaching experience as the teacher of record in a similar licensure field,
- depth of content knowledge,
- depth of content methods or general pedagogy,
- subject-specific professional development and contribution to the field, or
- classroom performance as determined by documented student growth on normed assessments or documented effectiveness on evaluations.

The statute is also clear that the rules must adopt criteria for determining “similar content field” and “similar licensure area.”

The Board’s proposed rule does none of this. Again, it is unfortunate that the statutory deadline has now passed and the Board has neither promulgated draft rules nor made any attempt to solicit public comment or input.

* * *

As I previously mentioned, we share our gratitude for your efforts in taking the first steps toward creating greater clarity and certainty in the application process.

If you have any questions about our comments, please do let me know. I would be happy to help the Board understand our concerns and comments, and the legal basis for them.

With Appreciation,



Daniel Sellers
Executive Director
MinnCAN

Doan, Erin (MDE)

From: Denise Dittrich <ddittrich@mnmsba.org>
Sent: Sunday, January 03, 2016 8:48 PM
To: Doan, Erin (MDE)
Subject: comments on rules
Attachments: E-LetterheadBOT.docx; ATT00001.htm

Hi Erin,

Thanks for taking the time to meet last week. It is hard to believe that it is 2016. As a follow-up, I will call you in the next couple of weeks to get some clarification on some of the things we talked about. When you get settled in the New Year would you please forward me the information on the St. Cloud teacher job openings clearing house you referred to? Another favor, would you forward me what your thoughts on broadening licensure in areas like science?

Here is MSBA's response to the most recent version of rules by BOT. I hope you will accept them given the fact that the 1st was a Holiday.

Thank you,

Denise

Denise Dittrich

Associate Director Government Relations

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MSBA's Mission:
Support, promote, and
enhance the work of
public school boards
and public education.

Dear Executive Director Doan, Chair Bellingham and the members of the MN Board of Teaching,

On behalf of the Minnesota School Boards Association, we want to thank you for the challenging work you do to ensure high-quality teachers in every classroom in the State of Minnesota.

Thank you for the opportunity to provide input on the most recent rulemaking draft of licensing requirements for teacher candidates trained in other states. Bill Kautt, Associate Director of the MN School Boards Association, has submitted five concerns in his analysis of the proposed rules in contrast to recently passed legislation in an email dated December 29th, 2015. I will not reiterate those specific concerns for the purposes of this letter instead I will make some general comments and encourage you to reflect these observations in your final draft.

We encourage the Board of Teaching to define, implement and make public a streamlined process for full teacher licensure by which all licensed teachers in other states can follow. This process should be transparent and simple enough that a local school board may clearly articulate to an out-of-state teacher candidate the process for full Minnesota teacher licensure.

We encourage the Board of Teaching to reinstate licensure via portfolio process (or something similar) as an alternative pathway to licensure for all candidates. School Boards are now required to have a Teacher Development and Evaluation tool in place. The teacher evaluation tool may complement or substitute as alternative pathways to full licensure for all teacher candidates. The EdTPA is another tool that may be used as a performance measure of excellent teaching.

We encourage the Board of Teaching to use the rulemaking process to reflect and clarify the current law where needed. One example that has not yet been addressed is clarification of the terms "similar content area" and "similar license".

We encourage the Board of Teaching to resist creating new requirements for licensure unless the new requirement simplifies the current process or eliminates current barriers to licensure.

We encourage the Board of Teaching to work seamlessly with the Department of Education's Educator Licensing Division.

We encourage the Board of Teaching to retain the reference to teacher "shortage areas," which is clearly defined in law. Teacher shortage is a concern for school board members across the state and country.

In summary, we asking that the rules reflect the legislative intent of the law signed by Governor Dayton in June of 2015. We believe it was the intent of the legislature and the Governor to reduce the barriers to teacher licensure, streamline the process for out-of-state and find alternative pathways and solutions to help alleviate the teacher shortage issue in Minnesota.

Sincerely,

Denise Dittrich

Associate Director of Government Relations