Minnesota Association of Colleges for Teacher Education

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Changes Needed in Specific PERCA Rule Language To Meet SONAR Goals and Expectations

Goals 1 and 2. Add specificity to existing rules to make them clearer and measurable. Separate multi-faceted rules into discrete statements of expectations

Meeting goals 1 and 2 requires that targets for expectations involved in unit and program approval are clear and transparent. The rules are not yet clear on defining performance indicators that are needed in determining if a program has met or has not met the expectations. The rules do not include the development of specific, discrete language or criteria, by which programs and institutions and the Board of Teaching (BOT) can consistently measure or evaluate the degree to which expectations have been met or not met. The use of a Program Review Panel to resolve differences between evaluations by the BOT staff and an institution would still be left to subjective judgment by the Review Panel if specific criteria are not developed to define the clear, specific, and measurable expectations. The level of subjective judgment that is left with BOT staff and the Program Review Panel participants does not meet Goals 1 and 2. In addition, both the BOT and the Program Review Panel may exempt alternative programs from some standards during the program approval process. The number and extent of these exemptions is not clear, specific, measurable, or transparent in the rules. The following two changes are needed to meet Goals 1 and 2. The PERCA rules must require the development of an evaluation guide that clearly articulates for all institutions the specific and measurable expectations for what constitutes the criteria by which a judgment of met or not met is applied in the unit and program approval processes. The second change that is required is a clear statement of expectations of which standards must be met, which might be exempted, and how many exemptions are allowed under an alternative program approval application.

Goal 5. Clarify the uniform expectations for all programs, traditional as well as non-traditional types

There are several places in the draft PERCA rules where uniform expectations are not present and should be revised.

1. In several places, the rules reference that BOT will make comparisons with other institutions based upon the number of credits expected for that standard to determine if a program is meeting the standard. Program approval is a standards based system not a credit based, Carnegie hours system. Decisions about whether an institution meets a standard should not be based upon comparisons with other institutions and their credit requirements, but upon clear criteria regarding whether the standard is met or not met. This language should be removed or replaced by the development of clear criteria (as is indicated in comments on Goals 1 and 2) to assure uniform, not comparative expectations for all programs. To do otherwise will limit innovation and development of alternatives through non-traditional programs.
2. The PERCA rules are not consistent in the expectation of field experience hours prior to student teaching. In some cases the hours listed are 100 hours, in some cases, 150 hours. It has been our understanding that 100 hours would be the requirement and that should be consistently applied throughout the rules.
3. The rules provide a clear definition of Advanced Academic Preparation in the beginning of the document which states, "Advanced Academic Preparation means a minimum of a master's degree and content expertise in the licensure subject to be taught". This definition is not uniformly used throughout the rules. In some places the rules expand the requirement to include an advanced **degree** in the content

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area, rather than the definition language of 'content expertise' which will add unnecessary additional personnel constraints that could produce hiring and teaching assignment hardships for many institutions by imposing new qualification constraints. The language at the beginning of the document should be applied uniformly throughout the rules.

4. The expectations for programs with low enrollments are not the same as those applied to other programs. The additional scrutiny of the programs every two years before the Program Review Panel is an added reporting expectation. Most of these low enrollment programs are in teacher shortage areas such as Physics, Chemistry, World Languages, ESL, Special Education, Parent Education, FACS, Agriculture, Technical Education, and Business. Just because a program produces lower numbers of graduates does not mean that the program is of low quality. Additional review of these programs is an unequal expectation and the additional expense and effort will threaten the very programs we need to protect to meet teacher shortage areas. Although the performance data for these candidates should not be reported publicly to protect the identities of the candidates, the data is known by the program, unit, and BOT and can be assessed and discussed as part of the regular program approval process which makes this requirement unreasonable. The requirements in Section 4.B.2 for low N programs should be deleted from the policy and all programs should be reviewed via the same process. The language in 4.B.1 should not specify that there be ten completers in order to review a program. These language changes will provide a consistent application of the rule to all content areas in all institutions.

Rule 6 and 7. Articulate rules provided by statute 122A.245 for alternative providers of teacher preparation programs. Articulate rules provided by statute 122A.09 requiring uniform teacher performance assessment

As indicated under Goals 1 and 2, consistent and transparent expectations for which standards may be exempted under alternative program applications must be clarified to permit uniform application of this statute. The PERCA rules are also clear that program approval (Traditional, Non-Traditional, and Alternative) requires the completion of a state approved performance assessment during student teaching. The rules do not provide uniform expectations for measuring this teacher performance prior to obtaining a license. Under traditional and non-traditional programs, the teacher performance measure is completed prior to receiving a license and becoming the teacher of record. Under alternative program approval rules, as currently drafted, a limited license may be granted through alternative program approval with student teaching, and the performance assessment, occurring several years after the teacher becomes the teacher of record. The rules for alternative program approval do not define uniform expectations for reporting teacher performance data on candidates prior to becoming the teacher of record and this must be addressed to equitably and uniformly assess the teacher performance of candidates and continuous progress across all programs.

Other SONAR Evidence Required - Reasonableness of Costs Compared to Need

Although we may agree that the rules provide an improved and expedited process for program approval that is very much needed, there are very real costs for students, institutions, and for the Board of Teaching that may seriously impede the execution of the PERCA rules.

1. Many students are already incurring significant expenses related to the MTLE licensure tests and the addition of the edTPA increases student expenses by $270/student unless the institution picks up the scoring fee. If the institution is required to pick up the scoring fee because it is part of the program

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approval process, this must be absorbed and reduces resources elsewhere. In larger institutions, this reduction in resources is sizable.

2. Institutions must maintain more extensive data systems and nearly all must contract with vendors to achieve the level of specificity and accuracy of data needed to meet the standards in the rules. The level and complexity of data needed increases the cost of the systems needed to meet the new rules. Maintaining the data systems and reporting as required to the Board of Teaching will require additional faculty time. If the definition of Advanced Academic Preparation is not uniform throughout the rules as recommended above, it may become extremely difficult to find faculty with the additional qualifications required and there may be additional costs to hire faculty with more specific content, experience, and scope of preparation. There are other means by which programs can demonstrate the relevancy of the work or positions held and these means should be defined if more specificity is needed. The additional reporting requirements for programs that produce low numbers of candidates will also result in additional costs if the changes recommended above are not made. Finally, the implementation of the state mandated teacher performance assessment requires not only that the assessment is scored externally ($270), but that institutions and programs evaluate the performance of at least a sample of their candidates as part of their continuous improvement process. This is an additional cost for this assessment born by the institution, not born by the student. During the implementation of this performance assessment, a grant through a private foundation paid for some of this local evaluation, but the grant is ending and the ongoing cost will be required of institutions. In a higher education environment of fixed, or even declining revenues, the resource reallocations required to meet all rules may create adverse impacts on programs and institutions.
3. A final concern is the amount of work PERCA will create for the BOT and BOT staff. The BOT will incur new costs for the ongoing maintenance of the data management system to house program reports associated with the biannual program approval process. The Board is already seriously underfunded and understaffed so that implementation of something this large and complex without additional funding may be unreasonable. The cost for loading program data into the data system has been initially born by programs and institutions. Funding through a grant from a private foundation, administered by the Minnesota Association of Colleges of Teacher Education, is necessary to continue the edTPA standard setting process to clarify performance levels expected for the program approval process. It is unclear how the Board, with limited existing staff will convene, supervise, and support the Program Review Panel. Will members be volunteers or paid and will expenses such as mileage, food, or lodging be provided? Will panel members be selected by MACTE caucus vote or BOT appointment? Without additional funding and staffing, the development of detailed evaluation criteria for the Board and Program Review Panel as outlined in changes for Goals 1 and 2 and the biannual evaluation of that data for program approval may be severally limited.