

Pre-Hearing Response to Public Comments

In the Matter of the Proposed Amendments to the Rules Governing Unit and Program Approval, Minnesota Rules, chapter 8705; Proposed Repeal of Minnesota Rules, parts 8705.0200, subparts 2, 7, and 9; 8705.0300; 8705.1000; 8705.1100, subparts 1, 3, 4, and 5; 8705.1200; 8705.2200, subpart 4; 8705.2300; and 8705.2400

September 15, 2020

Introduction

The Minnesota Professional Educator Licensing and Standards Board (PELSB) is proposing changes to the rules governing teacher preparation. PELSB published its Notice of Hearing in the State Register on July 6, 2020. The Notice of Hearing triggered a comment period, which ended on August 10, 2020. PELSB received 21 comments ([compiled here](#)).

This document outlines the concerns and issues raised in the comments received during this comment period, with response to each from PELSB.

Adopted Revisions

In response to many comments, the Board adopted a number of revisions to its proposed rules as published in the Notice of Hearing. The revisions are noted throughout this document.

Definitions

Definition of “assessment system.”

Summary of comment(s)

Several stakeholders submitted comments on the proposed modifications to the definition of “assessment system.” A number of commenters urged the Board to remove the terms “valid” and “reliable” from the definition (See [Comment 9](#), [Comment 15](#), [Comment 18](#), and [Comment 19](#)) or consider defining these terms (See [Comment 19](#)). Finally, one commenter urged the Board to also consider adding “assessment measures and processes” to the definition because “assessment and evaluation are different and an effective assessment system for continuous improvement only includes, but should not be limited to, evaluation measures. Assessment measures and processes are also key components of a system of assessment.” (See [Comment 15](#)).

Response

In response to one comment, on August 28, 2020, the Board adopted revisions to the definition of “assessment system.”

Assessment system. "Assessment system" means a comprehensive and integrated set of valid and reliable evaluation and assessment measures that provides information for use in monitoring candidate demonstration of standards, and managing and improving unit operations and programs.

The revisions will not make the adopted rules substantially different from the proposed rules, because adding the word “assessment” merely clarifies the overall intent of the standard and does not add additional requirements. The addition of “and assessment” acknowledges the meaning, nature, and purpose of the terms assessment and evaluation are different.

The Board deemed that it was necessary to keep “valid” as the measurements and assessment measures must evaluate what is intended in order to demonstrate program effectiveness adequately as required by Minnesota Statute 122A.092, subdivision 2(3) where as a requirement for program approval, programs must demonstrate effectiveness based on proficiency of program completers. Similarly, the Board agreed it was necessary to keep “reliable” as there must be consistency in evaluation and assessment measures between raters with consistent conditions for the purpose of demonstrating program effectiveness. Additionally, the Board finds the requirements of “valid and reliable” to be reasonable as these are also data terms and concepts used throughout the field (i.e., Council for the Accreditation of Educator Preparation and Association for Advancing Quality in Educator Preparation).

The proposed changes to the definition of assessment system, with the addition of “and assessment” are **needed and reasonable** to ensure each providers’ assessment system is capable of measuring candidate and program quality. The assessment system is a key component to a provider’s ability to prepare candidates for licensure in Minnesota.

Question(s) from Judge Lipman

Do the requirements that the assessment system be “valid and reliable” afford rights to others (students, the public, etc.) if a particular system does not meet these standards?

Response

Yes, if an assessment system is not “valid and reliable,” it could adversely impact which candidates are recommended for licensure and the quality of candidate feedback provided. For example, if particular supervisors consistently rates candidates higher than other supervisors and if supervisor evaluation cut scores are used as an exit criteria, candidates with higher scoring supervisors would be more likely to be recommended for licensure than candidates with lower scoring supervisors. Additionally, if candidates write a paper on their philosophy of establishing a classroom environment, but the rubric on that paper is built around evaluating a candidate’s writing, then that candidate loses an opportunity to get feedback on how to foster a positive classroom environment.

Question(s) from Judge Lipman

Are validity and reliability defined standards in this setting?

Response

While there are statistical definitions used for “valid” and “reliable” that may be applied in this setting, the standard does not require this. Instead, the general terminology of valid and reliable would be used in evaluating the assessment system, asking “are the right factors being used to gather information

toward the end goals?” and “are the assessments designed to obtain consistent data?” The terms “validity” and “reliability” have been used similarly by two notable national accreditation agencies.

National Accreditation Agency	Definition of Validity	Definition of Reliability
CAEP	<p>The extent to which a set of operations, test, or other assessment measures what it is supposed to measure. Validity is not a property of a data set but refers to the appropriateness of inferences from test scores or other forms of assessment and the credibility of the interpretations that are made concerning the findings of a measurement effort.¹</p>	<p>The degree to which test scores for a group of test takers are consistent over repeated applications of a measurement procedure and hence are inferred to be dependable and repeatable for an individual test taker. A measure is said to have a high reliability if it produces consistent results under consistent conditions.</p>
AAQEP	<p>In vernacular discussions, validity answers the question “<i>Does an instrument actually measure what it claims to measure?</i>” Current measurement theory focuses on the validity of inferences drawn from data and the consequences of their use. In practical terms, confidence in the validity of evidence produced by a given measure is supported by (a) alignment between the instrument and relevant standards or constructs, (b) evaluation of the instrument by external partners who help generate the evidence (expert review), and (c) affirmation by external stakeholders who use or might use the evidence in making evaluative decisions. As a whole, validity evidence should make a convincing case that evidence produced by the measure can be trusted as an indicator. Not all types of validity must be considered for any particular measure.²</p>	<p>In general, reliability concerns the question of whether a given measure or instrument produces the same results in multiple applications. Repeated administration (test-retest) and item-level analysis (internal consistency) are common strategies for studying instrument reliability. While these aspects of reliability are of interest, the main reliability issue for accreditation in educator preparation is the consistent application of rating forms by multiple raters—such as faculty grading key assessments used in program monitoring and valuation, or P-12 partners in clinical settings.</p>

¹ See <http://caepnet.org/glossary/>.

² See <https://aaqep.org/wp-content/uploads/2020/01/2020-Guide-to-AAQEP-Accreditation.pdf>.

Definition of “cooperating teacher.”

Summary of comment(s)

One commenter recommended PELSB strike “may” from the definition of “cooperating teacher.”

Response

In response to this comment, on August 28, 2020, the Board adopted revisions to the definition of “cooperating teacher.”

“Cooperating teacher” means a teacher who has agreed to work with a candidate during the candidate's clinical experiences. A cooperating teacher's responsibilities ~~may~~ include modeling effective instruction to the candidate, observing the candidate engaging with students throughout clinical experiences, and providing feedback to the candidate based on these observations.

The deletion of the term “may” will not make the adopted rules substantially different from the proposed rules because revision clarifies the responsibilities of the cooperating teacher.

The proposed definition of “cooperating teacher,” including with this revision, is **needed and reasonable** as this definition standardizes this term, which is referenced throughout rule. Cooperating teachers play a key role in clinical experiences and standardized language ensures consistency state-wide.

Definition of “culturally responsive teaching.”

Summary of comment(s)

One commenter urged PELSB to adopt the definition of “cultural competence” as set forth in Minn. Stat. 120B.30, subdivision 1 (q), which means “the ability of families and educators to interact effectively with people of different cultures, native languages, and socioeconomic backgrounds,” as the commenter believed the definition of “culturally responsive teaching” is inconsistent with Minn. Stat. 120B.30. Another commenter suggested PELSB keep this definition of “culturally responsive teaching” as is, as the definition is consistent with how the phrase is used in the field. Finally, in a letter dated August 21, 2020, Judge Lipman provided possible rewording to the definition of “culturally responsive teaching” (see [Letter](#)).

Response

The Board did not adopt the definition of “cultural competence.” The proposed definition builds off national definitions of culturally responsive teaching and culturally responsive pedagogy from Geneva Gay and Gloria Ladson-Billings. It ensures teachers understand the diverse ways culture can impact learning, and the broader impacts of systemic issues on learning. The definition acknowledges that this level of understanding is needed to ensure relevant and effective education for students of all cultural backgrounds.

On August 28, 2020, the Board adopted Judge Lipman’s proposed rephrasing of the definition of “culturally responsive teaching.”

Culturally responsive teaching. “Culturally responsive teaching” means understanding ~~and applying the cultural knowledge,~~ prior experiences, frames of reference, and performance styles based on the lived experiences of students, ~~including and~~ the effects of systemic and

institutional racism, and applying this knowledge to make learning experiences more relevant and effective for students.

The revisions will not make the adopted rules substantially different from the proposed rules because the revision clarifies the definition. The proposed definition, with revisions, are **needed and reasonable** to ensure the intent of the definition is clear and understandable.

Definition of “program completer.”

Summary of comment(s)

Several commenters expressed concerns with the definition of “program completer,” specifically the proposed requirement that a candidate have a score on the teacher performance assessment. One commenter noted that this would delay a provider’s ability to make a recommendation that a candidate be licensed (for example, when a candidate receives a score of “unscorable”). Another recommended that mention of a teacher performance assessment be deleted altogether.

Response

In response to these comments, on August 28, 2020, the Board adopted revisions to the definition of “program completer.”

"Program completer" means a ~~person~~ candidate who has met ~~all the~~ a program's completion requirements.... For an initial licensure candidate to be counted as a completer, the candidate must complete student teaching in the licensure area sought and ~~receive a score on submit the~~ board-adopted teacher performance assessment for official scoring, if applicable. For an additional licensure candidate to be counted as a completer, the candidate must complete an evaluated practicum in the licensure area sought.

The Board found that the change was **needed and reasonable** to avoid delays in licensure.

The Board did not delete the requirement that an initial licensure candidate complete a teacher performance assessment in order to be considered a “program completer,” because this data is needed as a measure of program effectiveness. The phrase “if applicable” addresses situations when there is not an applicable assessment for the candidate to complete.

The revisions will not make the adopted rules substantially different from the proposed rules because they do not change the substance of the definition. Rather, it offers flexibility for providers to recommend a candidate upon submitting the teacher performance assessment for scoring, but perhaps before a final score has been granted.

Definition of “professional dispositions.”

Summary of comment(s)

One commenter suggested PELSB adopt the following definition “the values, commitments, behaviors, and professional ethics that influence how a teacher interacts with students, families, colleagues, and communities.”

Additionally, Judge Lipman provided feedback on the proposed rule changes, including possible rewording to the definition of “professional dispositions” (see [Letter dated August 21, 2020](#)).

Response

On August 28, 2020, the Board adopted Judge Lipman’s proposed rephrasing of the definition of “professional dispositions.”

Professional dispositions. "Professional dispositions" means the values, commitments, and professional ethics that ~~govern how a teacher acts~~ are needed to maintain appropriate professional relationships with students, families, colleagues, and communities.

The revisions will not make the adopted rules substantially different from the proposed rules, because the revision clarifies the definition, specifically the appropriateness of the dispositions. The definition of professional dispositions continues to be **needed and reasonable** as to provide clarity for providers who, under current rule, have been required to monitor professional dispositions without a standard definition. This will allow a common understanding of the requirements specific to professional dispositions set forth throughout the proposed rules

Definition of “professional license.”

PELSB proposes adding a definition for the term “professional license.” Several stakeholders submitted comments on the proposed definition. One commenter recommended PELSB add “or another country” to the definition of professional license (See [Comment 9](#)). Another set of comments focused on whether “professional license” should be given another name, such as “permanent license” or “portable license,” or removed altogether (See [Comment 6](#), [Comment 18](#), and [Comment 12](#))

Response

The Board did not adopt revisions to the definition of “professional license.” The term “professional license” and the corresponding sections of rule that require a professional license are essential (i.e., **needed and reasonable**) to ensure that the individuals preparing new teachers have themselves already met the professional standards for the profession of teaching.

There are a number of key concepts that distinguish Tier 1 and Tier 2 licenses from Tier 3 and Tier 4 licenses. Most notably, Tier 1 and Tier 2 licenses are tied directly to a particular district or charter school (i.e., in order to receive a Tier 1 or Tier 2 license, an applicant must have a job offer); whereas Tier 3 and Tier 4 licenses are specific to a particular teacher (i.e., the license is granted because the teacher has demonstrated the necessary qualifications). Additionally, state statute requires a district to attempt to hire an individual on a higher tier prior to hiring an individual requiring a Tier 1 license.

	Tier 1	Tier 2	Tier 3	Tier 4
Job offer required	Yes	Yes	No	No
Portable (i.e., does license transfer to a new district)	No	No	Yes	Yes

	Tier 1	Tier 2	Tier 3	Tier 4
Renewal	Can be renewed three times ³	Can be renewed three times ⁴	Unlimited	Unlimited
Passing scores in content and pedagogy examinations required	No	No ⁵	Yes	Yes
Demonstration of professional teaching standards required	No	No	Yes ⁶	Yes

The requirements and attributes of tiered licensure clearly distinguish Tier 1 and Tier 2 licenses from Tier 3 and Tier 4 licenses.

Many other states also distinguish between their professional licenses and other temporary or emergency licenses.

	“Temporary,” “emergency,” “permit”	“Professional,” “Standard”
Iowa	<p>Temporary initial teaching license: Completion of a full state of Iowa approved teacher preparation program (except for the required completion assessments) for college semester hour credit including meeting at least one of our endorsement requirements. A position offer in Iowa is required, and the district must show a diligent search.⁷</p>	<p>Initial teaching license: Completion of a full state of Iowa approved teacher preparation program for college semester hour credit including meeting at least one of our endorsement requirement⁸</p> <p>Standard teaching license: Two years of successful teaching in an Iowa public school, or 3 years in an accredited private or out-of-state setting. Usually a holder of an initial teaching</p>

³ See Minn. R. 8710.0311, subd. 6 for exceptions.

⁴ See Minn. R. 8710.0312, subd. 6, for exceptions.

⁵ While passing scores is not a requirement for all applicants seeking a Tier 2 license, an applicant can use their passing scores as one way to demonstrate one of the two required coursework components for the Tier 2 license (see Minn. Stat. 122A.182, subd. 2).

⁶ Notable, there is one exception. A teacher that has three years of teaching experience on a Tier 2 may obtain a Tier 3 license. In this instance, the teacher has not necessarily demonstrated state teaching standards.

⁷ See <https://boee.iowa.gov/licauthorization/temporary-initial-teaching-license>.

⁸ See <https://boee.iowa.gov/licauthorization/initial-teaching-license>.

	“Temporary,” “emergency,” “permit”	“Professional,” “Standard”
		license converts to a standard teaching license. ⁹
Ohio ¹⁰	<p>12-Hour Temporary Teaching Permit: Educators are limited to teaching 12 hours a week in the subject area(s) listed on the permit. The one-year permit is valid only in the requesting Ohio school district.</p>	<p>4 Year Resident Educator License: The Department issues Resident Educator licenses to beginning teachers who have completed an approved teacher preparation program through an accredited college/university or the Ohio alternative pathway.</p> <p>5 Year Professional Educator License: The Department issues professional educator licenses to teachers who have completed the Ohio Resident Educator Program or who have met teaching experience requirements under a standard out-of-state teaching license.</p>
Colorado ¹¹	<p>Emergency (1 year):</p> <ul style="list-style-type: none"> • Bachelor’s or higher degree from a regionally accredited college/university (must hold the degree required to practice the specialty requested) • Enrollment in an approved preparation program that leads to fulfillment of the requirements for an initial license • School district verification of its need for the individual to provide students services that would otherwise be unavailable due to the lack of a fully licensed individual 	<p>Initial (3 years):</p> <ul style="list-style-type: none"> • Bachelor’s or higher degree from a regionally accredited college/university • Completion of an approved preparation program which led to licensure in the state in was approved • Demonstration of content-area knowledge (by degree and/or exam(s), depending on content area) • Student teaching/practicum/internship <p>Professional (5 years)</p> <ul style="list-style-type: none"> • Initial Colorado license-holder (or meets the requirements for a Colorado initial license) • Completion of a Colorado State Board of Education-approved induction program (out-of-state applicants may qualify with three consecutive years of full-time, licensed teaching experience)

⁹ See <https://boee.iowa.gov/licauthorization/standard-teaching-license>.

¹⁰ For teaching licenses issued by the Ohio Department of Education, see <http://education.ohio.gov/Topics/Teaching/Licensure/Apply-for-Certificate-License>.

¹¹ For teaching licenses issued by the Colorado Department of Education, see <http://www.cde.state.co.us/cdeprof/credentialtypes>.

Definition of “teacher educator; instructor.”

Summary of comment(s)

Several commenters expressed concerns about the scope of the proposed definition of “teacher educator,” especially as applied to “content instructors” who are not directly a part of the unit.

Response

The Board discussed and debated which teacher educator qualifications and requirements should apply to different instructor types and their intent was that Standard 23 should not apply to “content instructors” who are not a part of the unit.

In response to the comments received, on August 28, 2020, the Board adopted revisions to the definition of “teacher educator; instructor.”

““Teacher educator” or “instructor” means the individual employed or directed by the unit to facilitate ~~facilitating~~ a candidate’s learning opportunities and assessments.

This revision aligns with the intent of the rule language. Many stakeholders understood the proposed rule language to already align with the adopted revision. Therefore, this revision will not make the adopted rules substantially different from the proposed rules. The definition of “teacher educator,” with the adopted revisions, is **needed and reasonable** to ensure that the rules and requirements applying to instructors is clear and consistent statewide.

Unit Standards

Qualifications for cooperating teachers (Standard 10).

Summary of comment(s)

A cooperating teacher is a teacher who has agreed to work with a candidate during the candidate’s clinical experiences. Several stakeholders submitted comments on the proposed changes to the qualifications and requirements for cooperating teachers. One commenter does not dispute the spirit of the proposed rule change but argues that the proposed rule changes are unduly prescriptive so as to become burdensome and harmful to the goal of training effective educators to serve full careers in Minnesota school (See [Comment 7](#)). One commenter recommended that a cooperating teacher be required to complete cultural competency training if the teacher is working with a student teacher who is of color of American Indian (see [Comment 15](#)). Another commenter suggests eliminating the requirement for a professional license for cooperating teachers of infants and toddlers, and rather, require three years of teaching experience (See [Comment 2](#)). Finally, there were comments that the Board should not require the completion of professional development in coaching strategies for adult learners (See [Comment 4 and Comment 18](#)) or the Board should replace “has completed professional development in coaching strategies for adult learners” with “models effective coaching strategies with candidates” (see [Comment 18](#)),

Response

Effective cooperating teachers need to be skilled at both supporting student learning and supporting adult teacher candidates, and the Board does not believe that these skillsets are innate. The skills needed to do each are distinct. The training included in proposed rule are **needed and reasonable** to support teacher candidates. The Board has chosen to focus on an input (training on coaching) that overtime is tied to positive program outcomes rather than the output (effective coaches).

While completion of cultural competency training is not explicitly addressed in the rule language, all cooperating teachers must be licensed teachers and licensed teachers are required to complete cultural competency training as part of their renewal requirements. Therefore, each cooperating teacher will have completed cultural competency training within their last renewal cycle.

The Board seeks to establish rules that apply to all programs types. Within the 8710 teacher licensure rules, the Board may choose to make exceptions for particular programs such as for Early Childhood. Additionally, providers may also seek a discretionary variance.

On August 28, 2020, the Board adopted the following revisions:

Standard 10. The unit must collaborate with each school partner to ensure that:

(1) each cooperating teacher paired with a candidate during student teaching and practicum:

(a) has at least three years of teaching experience as a teacher of record in the licensure area;

(b) holds a professional license aligned to the assignment;

~~(c) is not on an improvement plan; and~~

~~(d) has completed professional development in coaching strategies for adult learners; and~~

~~(d) meets all other requirements set forth in state statute;~~

(2) each cooperating teacher paired with a candidate during field experiences:

(a) has at least two years of teaching experience;

(b) holds a Tier 2 license or professional license aligned to the assignment; and

~~(c) is not on an improvement plan; and meets all other requirements set forth in state statute; and~~

(3) each cooperating teacher receives training that addresses the cooperating teacher's role, program expectations, candidate assessments, procedures, and timelines.

The revisions will not make the adopted rules substantially different from the proposed rules because they are largely technical in nature. Instead of directly stating the state requirements in rule (not on an improvement plan), the rule points to statute that requires that cooperating teachers for student teachers are not on an improvement plan. The proposed changes would mean that changes to statute would not require rulemaking changes.

Designated school partnership (Standards 6 – 8).

PELSB is proposing new standards specific to a designated school partnership, which is intended to help bridge the divide between preparation and practice. Several stakeholders submitted comments on the proposed standards, including concerns about new or increased financial and personnel burdens (See [Comment 2](#), [Comment 4](#), and [Comment 9](#)) and whether the standards for a designated school partnership could be replaced by the requirement of a school partner becoming a part of an external advisory council (See [Comment 16](#), [Comment 17](#), and [Comment 19](#)). One commenter recommended PELSB use the terminology “enhanced school partnership” instead of “designated school partnership.” That same commenter argued these standards should be removed or rewritten to align with current requirements as the enhanced requirements are not needed or reasonable (See [Comment 15](#)).

Finally, one commenter urged PELSB to have a set of variance criteria as particular units' program structures (i.e., initial licensure vs. endorsement program; geographic placements of candidates; etc.) may make it impractical to form a designated school partnership (See [Comment 13](#)).

Response

The Board did not adopt revisions to the standards governing designated school partnerships. In redesigning teacher preparation standards, there was a strong desire to strengthen this relationship and increase input from schools and districts working directly with teaching candidates and recent program completers. The standards governing designated school partnerships continues to be **needed and reasonable** as one mechanism to increase the feedback from schools and districts to providers on the strengths and weaknesses of their candidates when entering teaching, and to provide opportunities for those "on-the ground" to help inform teacher preparation towards the needs of practicing teachers and the schools they serve. Through rule drafts, the Board has worked to limit the concerns regarding data sharing, and address some of the workload concerns without removing the intent. The Board believes the current proposed rule finds that balance.

Expectations for clinical experiences (Standard 9).

Summary of comment(s)

One commenter expressed concerns about the ability of a unit to sign an agreement with a school partner that addressed the "responsibilities of the candidate." Instead, the commenter recommended that the language be modified to address only the responsibilities of the unit and school partner, such as the unit is responsible for communicating expectations to the candidates.

Additionally, Judge Lipman provided feedback on the proposed rule changes, including possible rewording for Standard 9 (3) (see [Letter dated August 21, 2020](#)).

Response

In response to both comments, on August 28, 2020, the Board adopted the following revisions:

Standard 9. The unit and each school partner must maintain an agreement that addresses:

- (1) the ~~responsibilities held by expectations for~~ the candidate during a clinical experience;
- (2) the responsibilities held by the school partner during a clinical experience;
- (3) the grounds for removing a candidate from a clinical experience and ~~a the process for the~~ removal; and...

Proposed Standard 9 continues to be **needed and reasonable** to ensure teacher candidates have meaningful, intensive clinical experiences. The adopted revisions maintain the intent of the standard while also ensuring the language can be implemented.

Student teaching requirements (Standard 11 and Standard 12).

Summary of comment(s)

Student teaching is the capstone experience for teacher candidates, during which they are evaluated on their ability to implement subject-matter expertise, curriculum development, student assessment, and

other skills necessary to serving as an effective teacher. PELSB received several comments on the proposed student teaching requirements.

Number of weeks: One commenter urged the Board to consider adding some additional flexibility into the rule requirements, specifically asking the Board to consider:

(2) provide a minimum of 12 fulltime weeks, or the equivalent but no less than half-time, of face-to-face student teaching that: ~~(c) includes at least 80 percent of the contracted school week of face to face student contact time;~~

The commenter noted that the suggested revision offered would allow candidates who are working in schools as non-licensed educators to student teach more weeks (equivalent to 12 weeks, full-time) and retain their jobs part-time (e.g. 24 weeks if half-time student teaching) and there are advantages for longer student teaching placements in terms of relationships with students and exposure to more curriculum and assessments.

The same commenter noted that new rules should not require less experience student teaching. For single initial licensure (Stand #11) 80% of 12 full-time weeks would be the equivalent of just 9.6 full-time weeks. A candidate who student taught 80% of the contracted school week should need to student teach for at least 14.4 weeks.

Triad meeting and observations: Several commenters sought clarification on how to implement triad meetings and observations. Additionally, several urged the Board to consider reducing the number of required triad meetings and observations.

Clarification: Finally, one commenter requested the Board clarify Standard 12 to allow one 14-week placement that covers both licensure areas simultaneously would allow for a wider variety of meaningful placements matching cooperating teacher(s) roles and responsibilities, and creating efficiencies for school partners and candidates alike.

Response

Number of weeks: In response to the comment that the rules should require a full twelve weeks of student teaching, on August 28, 2020, the Board adopted the following revisions:

Standard 11. For candidates seeking an initial professional license, the unit must:

(2) provide a minimum of 12 full time weeks, or the equivalent number of weeks where the candidate is participating in at least 80 percent of the contracted school week, of face-to-face student teaching that:

(a) is aligned to the scope and content of the licensure field sought;

(b) is split into no more than two placements where each placement is with a continuous group of students and for continuous weeks in alignment with the school calendar and day;

~~(c) includes at least 80 percent of the contracted school week of face to face student contact time;...~~

Standard 12. For candidates seeking more than one professional license, the unit must:

(2) provide a minimum of 14 full time weeks, or the equivalent number of weeks where the candidate is participating in at least 80 percent of the contracted school week, of face-to-face student teaching that:

(a) includes a placement aligned to the scope and content of each license and endorsement sought;

(b) is split into no more than two placements, where each placement is a minimum of two weeks or the equivalent, with a continuous group of students and for continuous weeks in alignment with the school calendar and day;

(c) includes at least 80 percent of the contracted school week of face-to-face student contact time;

These revisions clarify that for a teacher candidate completing an initial licensure program, the candidate must complete at least 12 weeks of student teaching. The rule allows a candidate to drop down to a .8 full-time equivalent (FTE) (though, additional student teaching weeks are required). For a teacher candidate seeking more than one professional license, the candidate must compete at least 14 weeks of student teaching. Though, the rule also allows this candidate to drop down to .8 FTE (with additional student teaching). The proposed rule language, with revisions, are **needed and reasonable** to ensure a minimum standard of 12 weeks for all teacher candidates that focuses on exposure to different schools, students, and teaching styles, includes a meaningful feedback loop from supervisors and cooperating teachers, and helps candidates to prepare to transition to employment as a licensed teacher in Minnesota.

It is important to the note that the Board is willing to allow innovating or unique student teaching arrangements (such as part time) – though, on a case-by-case basis through variance.

Triad meeting and observations: The Board did not adopt revisions to the requirements specific to triad meetings and observations. The requirements formalize the observation, evaluation, and feedback process to standardize the support and continuous growth necessary for all student teachers. Feedback from the supervisor and cooperating teacher, in both writing and during triad meetings, are key for a candidate to understand areas of weakness and strength. Student teaching time is a unique opportunity to hone skills with intensive support prior to licensure and employment by a school district.

Clarification: A candidate would be able to have one 14-week placement that covers both licensure areas simultaneously. For example, a candidate seeking a license in Physical Education and Health could have one student teaching placement that is .8 FTE PE and .2 FTE Health for 14 weeks as each would have the equivalent of at least 2 weeks.

Practicum requirements (Standard 13).

Summary of comment(s)

One commenter recommended that the Board delete the requirements that a candidate's practicum experience (1) be with a continuous group of students and (2) be on consecutive days aligned with the school calendar. The commenter noted that many teachers seeking to add additional licensure do their field experience hours during their prep times or one day/week since finding substitute teachers is very difficult. Requiring 'continuous groups of students and consecutive days' will make it nearly impossible for these teachers to add additional licensure fields without putting their current students and their districts at a disadvantage, particularly in rural districts.

Response

After considering this comment, on August 28, 2020, the Board adopted the following revisions:

Standard 13. For candidates who have completed licensure via portfolio, ~~or have completed or are in the process of completing~~ a state-approved initial licensure teacher preparation program, and are seeking an additional license or endorsement, the unit must:

(2) design a practicum experience that addresses any gaps in prior experience listed in subitem (1) and that:

(a) aligns to the scope and content of the license or endorsement sought;

(b) is a minimum of 80 hours with a continuous group of students ~~and consecutive days aligned with the school calendar;~~

(c) provides observations with actionable feedback to ensure growth and attainment of standards with a minimum of two observations by the cooperating teacher;

(d) provides observations with actionable feedback to ensure growth and attainment of standards with a minimum of two observations by the supervisor;

The Board agreed that the striking of “consecutive days aligned with the school calendar” is appropriate, because many of these candidates are already in full-time teaching assignments. Also, these candidates have already demonstrated pedagogical skills and knowledge to earn their initial license, and most of these candidates have completed the more rigorous requirements for student teaching.¹² The Board did not remove the requirement that the practicum experience be with a continuous group of students as this is an essential component of practicum experiences. Standard 13, with revisions, continues to be needed and reasonable to ensure additional licensure candidates obtain practicum experiences that meet the candidates’ unique and personal needs, while also establishing a clear minimum number of hours and components applicable to candidates across the state.

Additionally, the Board adopted technical revisions to clarify that Standard 13 only applies to candidates that have completed an initial licensure program or licensure via portfolio. Standard 13 does not apply to a candidate that is “in the process of completing an initial licensure program.” The revision corrects a drafting error and aligns with the general understanding of this standard.

Proposed Standard 13, with adopted revisions, is **needed and reasonable** to establish a minimum set of requirements for all practicum experiences that are robust, yet flexible.

Candidates working as a teacher of record (Standard 14).

Summary of comment(s)

One commenter expressed concerns that there may be a typo in Standard 14, which requires a candidate working as a teacher of record to complete the requirements in Standard 12 (instead of Standard 11).

Response

In response to this comment, on August 28, 2020, the Board adopted the following revisions:

Standard 14. For a candidate working as a teacher of record while completing a teacher preparation program to obtain an initial professional license, the unit must ensure:

¹² Note: Individuals that obtained licensure via portfolio are not required to have completed student teaching but do have evaluated teaching experience.

(1) the candidate completes the requirements in Standard ~~11~~ 12;

The revisions will not make the adopted rules substantially different from the proposed rules because the reference to Standard 11 contains the appropriate requirements for these initial licensure candidates (whereas, Standard 12 contains additional requirements for initial licensure candidates seeking more than one license at a time).

Proposed Standard 14, with revisions, is **needed and reasonable** to ensure high-quality support for candidates serving as a teacher of record, with an acknowledgement of the flexible needs of placements in shortage areas or licensure areas with only one position in a district

Qualifications for supervisors (Standard 15).

Summary of comment(s)

A supervisor is the individual responsible for supporting and evaluating candidates during clinical experiences. Several stakeholders submitted comments on this proposed changes to the qualifications and requirements for supervisors.

Qualifications. One commenter noted that the proposed language is an improvement and reasonable (See [Comment 15](#)). While another urged the Board to maintain existing rule language or language similar to existing language -“must have a minimum of a master's degree and have at least one academic year of prekindergarten through grade 12 teaching experience aligned to the scope of the licensure programs they supervise” (See [Comment 19](#)). Finally, one commenter urged the Board to consider removing the ability for a non-licensed administrator to serve as a supervisor (See [Comment 8](#)).

Requirements. Other comments urged the Board to consider removing the requirement that supervisors complete professional development in coaching strategies for adult learners (See [Comment 4](#)) or to consider replacing “completes professional development in coaching strategies for adult learners” with “demonstrates competency in coaching strategies” (See [Comment 18](#)) or “completes professional development, including training on program requirements and evaluation procedures for candidates” (See [Comment 19](#)).

Response

On August 28, 2020, the Board adopted the following revisions:

Standard 15. The unit must ensure each supervisor:

(1) is qualified by one of the following:

(a) holding or having held a professional license aligned to the licensure field or scope of the license sought by the candidate and at least three years of experience as a teacher of record;

or

(b) ~~being a current or former licensed E-12 administrator with oversight of teacher evaluation;~~ or (c) being a current or former E-12 administrator with documented experience in teacher evaluation;

(2) completes professional development in coaching strategies for adult learners; and

(3) completes training on the program requirements and evaluation procedures for candidates.

The Board did not make substantive changes. Rather, this revision simplifies the standard, while also maintaining that current and former E-12 administrators, including those who don't hold an administrator's license, such as those serving in charter schools, may serve as a supervisor.

The Board continues to find the proposed qualifications **needed and reasonable** as they ensure that supervisors will have had experience serving as a teacher or an administrator (rather than returning to existing rule language that places the emphasis on academic credentials).

The Board continues to find the proposed requirement to complete professional development in coaching strategies for adult learners **needed and reasonable** as it ensures that supervisors have training in how to effectively coach and communicate with teacher candidates.

Informational resources for candidates (Standard 18).

Summary of comment(s)

One commenter expressed concerns that the term "other constituencies" is problematic in that it is too vague. The commenter recommended PELSB remove the term from the standard.

Response

In response to this comment, on August 28, 2020, the Board adopted the following revisions:

Standard 18. The unit must make available to candidates, online or in print, the following information:

(4) the unit's procedures for receiving and responding to complaints and grievances from candidates ~~and other constituencies~~;...

The revisions will not make the adopted rules substantially different from the proposed rules because the revisions remove the ambiguity for who a teacher preparation provider must receive and respond to regarding complaints and grievances; though, PELSB hopes providers have clear procedures for accepting and responding to complaints and grievances from teacher educators, supervisors, cooperating teachers, and other individuals that interact with the teacher preparation programs.

Proposed Standard 18, with revisions, is **needed and reasonable** as this standard establishes clear candidate protections centered on transparency.

Teacher performance assessment (Standard 21).

Summary of comment(s)

Two commenters recommended that the Board eliminate the requirement that initial licensure candidates complete a teacher performance assessment. Alternatively, a commenter urged the Board to consider requiring a cut-score for all initial licensure candidates. Finally, one commenter recommended the Board adopt the phrase "board-approved" instead of "board-adopted."

Response

The Board did not adopt any of the commenters' recommendations. Though, on August 28, 2020, the Board adopted technical/drafting revisions.

Standard 21. The unit must ensure each candidate, **prior to completing an initial licensure program, seeking an initial professional license** completes a board-adopted teacher performance assessment if an assessment exists that is aligned with the license sought.

Current and proposed rule requires that a teacher candidate enrolled in a teacher preparation program for initial licensure complete a teacher preparation assessment. In 2011, the Board of Teaching adopted the edTPA as its performance assessment. A teacher candidate does not need to meet “cut scores” to be recommended for licensure; rather, PELSB uses aggregate scores to monitor and assess program efficacy. This standard continues to be **needed and reasonable** so the Board and programs can review data for the purposes of program effectiveness and to provide initial licensure candidates with critical and intensive feedback on their ability to plan, provide instruction, and assess students.

Note: The Board does not see a distinction between the phrase “Board-adopted” and Board-approved” for the purposes of (1) identifying applicable cut scores for program efficacy or (2) identifying out-of-state options for teacher candidates completing a teacher performance assessment outside of Minnesota.

Question(s) from Judge Lipman

Would any score on the teacher performance assessment be sufficient for the Board’s purposes?

Response

For an individual teacher candidate, there is no Minnesota law or rule that requires that a candidate meet “cut scores” to be recommended for licensure.

For program efficacy, programs are monitored and held accountable for their edTPA pass rates.

Recruitment and Retention (Standard 16 and Standard 22).

Summary of comment(s)

Existing rule language requires providers to demonstrate its plans, policies, and practices for admitting and retaining diverse candidates and for recruiting and hiring diverse teacher educators.¹³

PELSB received several comments about the proposed rule changes. Several commenters raised questions about what an effective strategy looks like.

One commenter recommended that a reasonable, minimum standard should be established that candidate racial and ethnic diversity in units should be at least diverse as the total student population at the institution. The same commenter noted that licensure shortage areas and the severe shortage of teachers who reflect the racial and ethnic diversity of Minnesota’s students are very different and should be different standards or clearly different components of the standard.

Finally, one commenter recommended that there be a statewide to promote the teaching profession to boost interest and enrollment in teacher preparation.

Response

In response to all these comments, on August 28, 2020, the Board adopted the following revisions:

¹³ Minn. R. 8705.1000, subparts 4 (B) and 8 (C).

Standard 16. The unit must implement an effective strategy for recruiting and retaining strategies to recruit, retain, and increase the percentage of candidates who:

(1) complete programs that ~~to~~ address state and district teacher shortage areas; and

(2) are of color or indigenous in proportion to K-12 student demographic ratios, including racial and ethnic diversity.

Standard 22. The unit must implement an effective strategy for recruiting and retaining strategies to recruit, retain, and increase the percentage of teacher educators who are of color or indigenous in proportion to K-12 student demographic ratios with diverse backgrounds and experiences, including racially and ethnically diverse teacher educators.

These revisions clarify the requirements for providers for addressing Minnesota’s teacher shortage areas. Current rule language requiring “plans, policies, and practices” for recruiting and retaining diverse candidate pools and faculty has not significantly moved the needle in this area. In 2017-2018, teachers of color made up for 4.3% of all teachers while students of color made up for 33.5% of students.

These standards, with revisions, are **needed and reasonable** to ensure the recruitment and retention of diverse candidates and teacher educators in board-approved programs are prioritized, monitored and assessed. Diversifying the educator workforce continues to be a key priority of the Board.

Qualifications for teacher educators (Standard 23).

Summary of comment(s)

Standard 23 seeks to provide several pathways by which a teacher educator may be qualified, such as by considering prior teaching experience and one’s educational background. Under current rule, a teacher educator is qualified through academic credentials only. Several stakeholders submitted comments on the proposed changes to the qualifications and requirements for teacher educators.

General: One commenter urged the Board to be as flexible as possible as to avoid unnecessary barriers to the efforts to diversify the teacher educator workforce (See [Comment 20](#)). Another commenter offered a recommendation to clarify the beginning of the standard by stating “The unit must ensure each teacher educator is able to show expertise for teaching assignments in one of the following ways” (See [Comment 9](#)).

Master’s route (Standard 23 (1)): One commenter recommended the Board replace (1)(b) with “dissertation, publication of research in the teacher’s area of instruction to a peer-reviewed journal, or documentation of classroom-based research experience in the teacher’s area of instruction” (See [Comment 11](#)). Another commenter urged the Board to consider allowing an individual’s bachelor’s degree to align to the area of instruction (See [Comment 19](#)). Finally, one commenter urged the Board to revert back to the language presented in Draft 4:

(1) a master's degree or higher in the content area of instruction;

(2) a master's degree or higher in any field and at least 18 graduate credits in the content area of instruction (See [Comment 18](#)).

Bachelor’s route (Standard 23 (2)): One commenter urged the Board to consider removing the ability to be a teacher educator without holding at least a master’s degree (see [Comment 1](#)). Another commenter contradicted this and argued the proposed changes would honor the experience gained in the field of

teaching and allow the provider to hire credentialed teachers with vast teaching experience who do not hold an advanced degree (See [Comment 7](#)). One commenter critiqued the use of “national board certification” and “125 hours of instructional leadership activities” as being neither nontraditional nor equitable (see [Comment 18](#)). This commenter urged the Board to revert back to the language presented in Draft 4:

(3) a bachelor's degree in the content area of instruction and at least five years of experience in the industry (See [Comment 18](#)).

Finally, several commenters noted their concerns that the requirements for a teacher educator seeking to be qualified with a bachelor’s degree conflicts with Minn. Stat. 122A.2451 subd. 6, which states “The board must use nontraditional criteria to determine qualifications of program instructors, including permitting instructors to hold a baccalaureate degree only” (see [Comment 6 and Comment 18](#)).

CTE route (Standard 23 (3)): One commenter urged the Board to revert back to the language presented in Draft 4:

- (4) for instruction related to career and technical education or the visual and performing arts:
 - (a) at least five years of experience in the industry; or
 - (b) at least three years of experience in the industry and an industry-recognized certificate or license. (See [Comment 18](#)).

Response

After considering these comments, on August 28, 2020, the Board adopted the following revisions:

Standard 23. The unit must ensure each teacher educator is able to show expertise for teaching assignments ~~and through documentation of~~ one of the following:

- (1) ~~the individual holds~~ a master's degree or higher in any field and:
 - (a) at least 18 graduate credits in the teacher educator's area of instruction; or
 - (b) ~~has completed a~~ dissertation or published ~~peer-reviewed~~ research in the teacher educator's area of instruction;
- (2) ~~the individual:~~
 - (a) ~~holds~~ a bachelor's degree ~~in any field; and~~
 - (b) ~~has~~ at least five years of experience as a teacher of record; ~~and~~
 - (c) ~~with a professional license has completed a state-approved teacher preparation program.~~

At least one of the components listed in paragraphs (a) through (c) must align to the content area of instruction

~~holds or held with a professional license, and:~~

- (a) ~~national board certification; or~~
- (b) ~~participation in at least 125 hours of instructional leadership activities, such as serving as a cooperating teacher of candidates during student teaching or practicum, facilitating professional development for other teachers, mentoring teachers, or peer coaching;~~

At least one of the components listed in paragraphs (a) through (c) must align to the content area of instruction or

(3) for teacher educators of career and technical education or the visual or performing arts, the individual holds a bachelor's degree in any field and has at least five years of relevant professional work experience aligned to the teacher educator's area of instruction.

General: The Board is proposing the rule changes and in adopting revisions is seeking to add additional pathways to becoming a teacher educator. As noted earlier, under current rule, a teacher educator is only qualified through advanced academic credentials. The proposed rule language, with additions, expands this to also allow individuals with bachelor's degrees with additional professional experience or expertise to become teacher educators.

The Board agreed with the recommendation to clarify the beginning of the standard to have it read "The unit must ensure each teacher educator is able to show expertise for teaching assignments through documentation of one of the following."

Master's route: The Board agreed with the recommendation to add "peer-reviewed" to paragraph (b) to ensure the published research has been evaluated by others in the field. Peer review is a widely accepted indicator of demonstrating quality and rigorous research of a particular topic.

The Board did not change the qualification for "18 graduate credits in the area of instruction" as this proposed language is in alignment with qualifications set forth by the Higher Learning Commission.¹⁴

Bachelor's route: The Board adopted revisions that replaced the requirement to "hold a professional license" with "having completed a state-approved teacher preparation program." The change from professional license to "completed a state-approved teacher preparation program" keeps the intent of meeting professional standards and ensures the teacher educator themselves have experienced a teacher preparation program.

This change is **needed** to ensure teacher educators have the necessary knowledge and skills to be effective teacher educators. It is a **reasonable** balance between high expectations and the ability for flexibility within teacher preparation providers in finding teacher educators with different types of experience and skills for their candidates.

The revisions regarding alignment to content area of instruction are clarification of Board intent.

There was much discussion regarding requiring either national board certification or 125 hours of instructional leadership activities. The adopted revisions changes Standard 23(2) to reflect stakeholder concerns that these two requirements may be burdensome for many individuals.

Finally, the Board proposes moving from "professional license" to "completed state-approved teacher preparation" to strengthen the standard to balance the removal of items Standard 23(2) (a) and (b).

CTE route: The Board adopted technical changes for clarification purposes. The Board did not change the requirement for teacher educators of career and technical education or the visual or performing arts to hold a bachelor's degree as this was the minimum requirement set forth by Minn. Stat. 122A.2451, subdivision 6.

Statement of need and reasonableness: PELSB's proposed teacher educator qualifications, with revisions, are reasonable and necessary to ensure a minimum set of criteria for Minnesota's teacher

¹⁴ Policy CRRT.B.10.020 (B)(2)(a), <https://www.hlcommission.org/Policies/assumed-practices.html>.

educators. The qualifications are more expansive than current rule and there continues to be opportunities to evidence non-traditional criteria through the discretionary variance process.

Qualifications for methods instructors (Standard 24).

Summary of comment(s)

Several stakeholders submitted comments on the proposed changes to the qualifications and requirements for methods instructors. A summary of the comments is included below.

General: One commenter urged the Board to be as flexible as possible as to avoid unnecessary barriers to the efforts to diversify the teacher educator workforce (See [Comment 20](#)). Additionally, one commenter requested additional clarifications on the qualifications allowed under the standard. One commenter noted that methods teachers are experts at subject-specific pedagogy and their required qualifications should reflect that. (See [Comment 3](#)). Finally, one commenter urged the Board to only allow teacher educators with master’s degrees or higher (see [Comment 1](#)).

Years of E12 teaching experience: One commenter urged the Board to require a methods instructor to have taught E12 at least one year in the content area (See [Comment 15](#)). Another commenter disagreed and urged the Board to allow teaching experience to be aligned to either scope or content (rule should not require alignment to both) (see [Comment 2](#)).

Several commenters noted that raising the required experience for a methods instructor from one year to three years (for those instructors with master’s degrees) will prove challenging for recruiting instructors in certain subject areas or from particular identities and experiences (See [Comment 7](#), [Comment 10](#), [Comment 11](#), [Comment 19](#)). Given these concerns, several commenters argued to allow a “grandfather clause” (“legacy clause”) for all existing methods instructors (See [Comment 7](#), [Comment 11](#)).

Master’s route: One commenter recommended that the Board consider providing the option of increased graduate education related coursework to replace the state-approved licensure program (See [Comment 7](#)).

Teacher preparation and/or licensure: One commenter urged the Board to reconsider the qualifications as requiring that all teacher educators must both be (or have been) licensed and also have completed a state-approved teacher preparation program will negatively impact a number of teacher educators who are well prepared to teach methods courses (See [Comment 9](#)). Finally, one commenter urged the Board to consider allowing a state-approved alternative method of licensure” for those who have obtained licensure but did not complete teacher preparation (See [Comment 4](#)).

Response

After considering these comments, on August 28, 2020, the Board adopted the following revisions:

Standard 24. The unit must ensure each teacher educator of field-specific methods instruction, including reading methods, is able to show expertise for teaching assignments ~~and~~ through documentation of one of the following:

(1) is qualified as a teacher educator under Standard 23, subitem (1), and: the individual:

(a) holds a master’s degree or higher in any field and:

(i) has at least 18 graduate credits aligned to the content area of instruction;

(ii) has completed a dissertation or published peer-reviewed research in the teacher educator's area of instruction; or

(iii) has completed a state-approved teacher preparation program aligned to content area of instruction; and

(b) has three years of experience as a teacher of record, including at least one year aligned to the scope and content area of instruction; and

(c) holds or held a professional license aligned to the scope and content area of instruction;

(2) is qualified as a teacher educator under Standard 23, subitem (2), and the individual:

(a) holds a bachelor's degree in any field;

(b) has completed a state-approved teacher preparation program; and

(b c) has seven years of experience as a teacher of record, including at least three years aligned to the scope and content area of instruction. and

At least one of the components listed in paragraphs (a) and (b) must align to the content area of instruction;

(c) holds or held a professional license aligned to the scope and content area of instruction;

or

(3) is qualified as a teacher educator under Standard 23, subitem (3), and: for teacher educators of field-specific methods in career and technical education or the visual and performing arts, the individual:

(a) holds a bachelor's degree in any field and;

(i) the bachelor's degree is aligned to the content area of instruction;

(ii) the individual has at least five years of relevant professional work experience aligned to the teacher educator's content area of instruction; or

(iii) the individual has completed a state-approved teacher preparation program aligned to the content area of instruction; and

(b) has ~~five~~ seven years of experience as a teacher of record, including at least three aligned to the scope and content area of instruction; and

(c) holds or held a professional license aligned to the scope and content area of instruction.

General: In adopting revisions, the Board sought to clarify the qualifications for methods instructors. Proposed Standard 24 continues to align to Proposed Standard 23 in that the qualifications differ depending on academic qualifications.

Proposed Standard 24 establishes several pathways to be qualified as a methods instructor. While holding a master's degree or higher may demonstrate expertise, the Board also believes previous teaching experience and completion of a teacher preparation program should also be considered.

Years of E12 teaching experience: The Board agreed with the recommendation to require at least one year of teaching experience be aligned to the content area of instruction. This will ensure each methods instructors has practical teaching experience in the content area and allow flexibility in allowing teaching in other content areas.

The Board did not lower the proposed number of years of required teaching experience for each of the three routes.

Standard 24 (1): While finding individuals who have three years of teaching experience may be more challenging than finding an individual who has one year of teaching experience, the Board considers the role of a methods instructor critical towards meeting 122A.092, Subd. 2(1) that programs have results-oriented curriculum focusing on the skills teachers need in order to be effective. To effectively prepare candidates, the Board finds it both needed and reasonable that the teacher educators instructing candidates how to teach have themselves had three years of teaching with at least one year in the content area. The revision requires that only one year be in the content area, where many had interpreted previous drafts that all three years would be in the content area.

Instead of providing a legacy clause, the rule allows time for teacher educators to come into compliance with proposed rule.

Master's route: The Board added additional flexibility to Standard 24 (1) by making completion of a state-approved teacher preparation one option to demonstrating content area expertise.

Teacher preparation and/or licensure: In an effort to create more flexibility, the Board removed the requirement to have held or currently hold a professional license aligned to the scope and content area of instruction for all three pathways. In certain licensure areas, specifically within Career and Technical Education, there are currently not many teacher preparation programs providing the opportunity to receive a professional license. Deleting "professional license" in this section acknowledges that other experience and skills in these fields along with teaching experience can provide the flexibility needed for teacher preparation providers to find qualified teacher educators for specified content area instruction.

CTE route: The Board adopted revisions requiring seven years of teaching experience instead of five years. This aligns the requirements for CTE methods instructors with methods instructors holding only a bachelor's degree.

Statement of need and reasonableness: Methods instruction is key to teacher preparation and includes learning opportunities and assessments on how to teach a particular content area. The proposed qualifications for methods instructors ensure these instructors have subject matter expertise as well as a deep understanding of the necessary pedagogical framework to support effective teaching.

Teacher educator effectiveness (Standard 25).

Summary of comment(s)

Many commenters agreed with the importance of assessing a teacher educator's effectiveness. Though, several stakeholders flagged concerns about the use of observations as part of a teacher educator's evaluation, specifically that some employment (union) contracts would not allow this. One commenter recommended that each teacher educator be assessed at least annually. Finally, one commenter urged the Board to clarify the standard to ensure the requirements for teacher evaluation were clear and transparent.

Response

In response to these comments, on August 28, 2020, the Board adopted the following revisions:

Standard 25. The unit must monitor and assess each teacher educator's effectiveness as an instructor at least once every three years, including using a teacher educator framework that

models continuous improvement practices and includes observations and candidate feedback, unless prohibited by an employment agreement.

The revisions clarify the intent of the standard – to ensure ongoing monitoring and assessment of each teacher educator’s effectiveness – while also providing flexibility in how this is ultimately done (for example, in circumstances when the provider cannot use observations).

The Board did not change the frequency of the monitoring and assessing, as the three year period aligns to a program’s review cycle. That said, the Board hopes providers continuously monitor and assess their teacher educators.

Proposed Standard 25, with revisions, is **needed and reasonable** to ensure continuous improvement efforts for programs includes the monitoring and assessment of teacher educators.

Ongoing requirements for teacher educators (Standard 26).

Summary of comment(s)

Standard 26 establishes ongoing requirements for teacher educators. Several stakeholders submitted comments on the proposed changes to these requirements. Two main themes emerged – (1) the recommendation that a teacher educator’s professional development opportunities should be “related to the teaching assignment(s)” rather than merely related to the field of education (See Comment 15) and (2) the recommendation to eliminate the specific number of hours required of professional involvement (See Comment 17 and Comment 19).

Response

In response to the recommendation that professional development be related to the teacher educator’s area of instruction, on August 28, 2020, the Board adopted the following revisions:

Standard 26. The unit must require and document for each teacher educator:

(1) completion of ongoing professional development opportunities ~~related to the teacher educator’s area of instruction, including professional development specific to the field of education~~ focusing on research-based best practices;

(2) completion of 30 hours in a three-year period of professional involvement in an early childhood, elementary, or secondary school setting aligned to the area of instruction that must include at least one of the following: teaching, tutoring, supervising candidates in the field, completing observations, school-level consulting, or engaging with a professional learning community; and

(3) completion of periodic orientation on requirements in chapters 8705 and 8710 and Minnesota Statutes, chapter 122A.

It continues to be essential (i.e., **needed and reasonable**) for each unit to ensure its teacher educator’s remain engaged with new theories of practices and research, E12 environments, and state requirements for teacher preparation.

The revision will ensure that some ongoing professional development is tied to the teacher educator’s area of instruction. This does not limit a teacher educator’s ability to complete professional development related to the general field of education or different topic areas.

The Board did not adopt changes to the “30-hour requirement” for involvement in a school setting. State law requires the board to adopt rules requiring teacher educators to work directly with schools to obtain exposure to the teaching environments.¹⁵ Thirty hours over a three year period is a reasonable minimum requirement. Additionally, it will ensure consistency unit- and state-wide. The rule provides examples of how a teacher educator can obtain exposure and the Board maintains that these minimum hours are absolutely needed and reasonable to ensure the statutorily required “periodic exposure.”

Adequate resources (Standard 29).

Summary of comment(s)

One commenter noted that providers must also have sufficient human resources (teacher educators and staff) to deliver effective programs that meet candidates’ needs and all of the standards.

Response

In response to this comment, on August 28, 2020, the Board adopted the following revisions:

Standard 29. The unit must have financial, human, and physical resources to maintain licensure programs, support teacher educators, provide administrative support, and meet all unit and program standards, including the ability to collect and analyze data for continuous improvement.

PELSB agrees that a provider must have the necessary human capacity to administer each of its licensure programs. Standard 29 continues to be a foundational unit standard (i.e., **needed and reasonable**) that focuses on the minimum resources necessary to ensure a unit can provide teacher preparation programs to teacher candidates. A provider that is unable to maintain licensure programs has the potential to cause substantial harm to a candidate.

Unit and Program Approval

Qualifications for program leaders.

Summary of comment(s)

Several stakeholders have expressed concerns about the requirement that the program leader be qualified as a methods instructor. Under current rule, program leaders must be qualified by “academic preparation in the content.”

Response

In response to the comments received, on August 28, 2020, the Board adopted the following revisions:

(b) the name and contact information for the designated program leader, who is responsible for delivery of this program and is qualified as a ~~methods instructor~~ teacher educator pursuant to part 8705.1010, subpart 5 (B) (Standard 23).

This revision would require the program leader to be qualified as a teacher educator pursuant to Standard 23. It is **needed and reasonable** for a program leader to be qualified as a teacher educator

¹⁵ Minn. Stat. 122A.092, subdivision 4.

pursuant to Standard 23, as this ensures that the program leader has a deep understanding of the content area and standards.

Initial Approval Timeline.

Summary of comment(s)

Several commenters have expressed concerns about the new proposed timeline for initial unit approval. While the new procedures are intended to give the provider additional opportunities to make revisions prior to the site visit, the new procedures will result in an overall longer timeline.

Response

The Board discussed the approval timeline and did not make revisions. The proposed rule provides the necessary time for providers to fully address required standards. In cases where a provider would like to move more quickly through this process, the provider can seek a discretionary variance.

For all four of the units initially approved in the last two years under current rule, at the point of the site visit, it was not clear how a significant number of standards were met. As a result, all four preparation providers had to provide additional narrative and supporting documentation following the visit and prior to obtaining initial approval. Two of the four preparation providers needed additional interviews following the site visit to verify that standards were met.

Therefore, the Board finds that it is both **needed and reasonable** to have this one-year timeline that allows reviewers to provide feedback on areas of deficit and for the provider to respond to gaps. This timeline and process is similar to that of national accreditation agencies (chart below).

National Accreditation Agency	Schedule Site Visit, Proposal submission	Feedback given to provider	Resubmission	Self-study submission	Provider receives feedback	Provider submits self-study addendum
Council for the Accreditation of Educator Preparation (CAEP)	18 – 24 months prior	n/a	n/a	9 months prior to visit	5 months prior to visit	3 months prior to visit
Association for Advancing Quality in Educator Preparation (AAQEP)	2-3 years	Within 3 months of submission	Within 2 months of receiving feedback	6 months prior to visit	4 months prior to visit	Prior or at beginning of visit

Midcycle Review.

Summary of comment(s)

Several commenters sought clarification regarding the timing of the report and general review process (i.e., whether peer review should be required and the applicable board determinations). One commenter recommended the Board consider changing the name of the “Midycle Review” to “Unit Report on Continuous Improvement.”

Response

On August 28, 2020, the Board adopted the following revisions:

8705.1500 ~~MIDCYCLE UNIT REVIEW~~ UNIT REPORT ON CONTINUOUS IMPROVEMENT.

Subpart 1. **Submission required.** To maintain continuing unit approval, a unit must submit a midcycle ~~unit report on continuous improvement self-study.~~

Subp. 2. ~~Midcycle self-study~~ **Unit Report on Continuous Improvement.** The unit must submit a ~~self-study~~ unit report on continuous improvement that provides the following:...

Subp. 3. ~~Midcycle self-study review~~ **Review procedures and board determinations.**

A. ~~Midcycle self-studies~~ Unit reports on continuous improvement must be initially reviewed by board staff.

B. A ~~self-study~~– unit report on continuous improvement must be reviewed by the board when:...

The change in language from “midcycle unit review” to “Unit Report on Continuous Improvement” clarifies for providers that this process does not follow the same process and actions as a unit review, but is instead an update on efficacy data, supporting the concept of continuous improvement. The Board maintains the authority to make a determination during this review or at any other time if a provider fails to evidence meeting unit standards, including during a review of an interim report that may or may not be timed with this report on continuous improvement.

The revisions will not make the adopted rules substantially different from the proposed rules because they are non-substantive in nature.

The proposed requirement for a Unit Report on Continuous Improvement continues to be **needed and reasonable** to more explicitly focus on continuous improvement and to add a layer of accountability during the course of unit approval.

Request for Initial Program Approval (RIPA).

Summary of comment(s)

Two comments were received about the RIPA process. One commented recommended the Board add language explicitly describing the second review process, which is conducted by content experts. Another commenter recommended that the language regarding “fewer than 10 candidates” should be removed because it disproportionately impacts small programs.

Response

In response to the comment about the second review process, on August 28, 2020, the Board adopted the following revisions:

Subp 3. Initial review process procedures.

- A. ~~RIPA applications will~~ RIPAs must be initially reviewed by trained content experts and board staff according to timelines and consistent with standards adopted by the Professional Educator Licensing and Standards Board. During the initial review, the content experts must identify each applicable standard in this chapter and parts 8710.2000 to 8710.8000 that align to the licensure area must be identified as "Met," "Met with Concern," or "Not Met." If ~~all the applicable standards are verified~~ found to be "Met" and there are no requests for a discretionary variance from standards in this chapter or chapter 8710, the application program will be recommended to the board for approval.
- B. If a program application does not meet all standards in the initial review, the findings will be returned to the applicant for clarification and resubmission during the initial review applicable standards are identified as "Met with Concern" or "Not Met," the provider may choose to make changes to learning opportunities and assessments for a second review. During the second review, the content experts must review changes to learning opportunities and assessments for standards identified as "Met with Concern" or "Not Met" during the initial review and determine whether the standards are "Met," "Met with Concern," or "Not Met."

The revision was added to rule to describe what is already in practice for the second review process.

The Board did not adopt changes to the review procedures that impact programs that have fewer than ten program completers. Minnesota Statutes 122A.092, Subd. 2(3) requires that programs demonstrate effectiveness to obtain Board approval. When there are few candidates, programs will need to be reviewed closer by the Program Review Panel to verify program effectiveness.

The proposed rule changes to the Minn. R. 8705.2100, including revisions, are **needed and reasonable** to ensure there is a clear, transparent, and consistent process for programs seeking initial program approval in the state of Minnesota.

Program Effectiveness Reports for Continuing Approval (PERCA).

Summary of comment(s)

One commenter expressed concerns that any change to a methods course would send the entire PERCA to a RIPA-level review.

Response

On August 28, 2020, the Board adopted the following revisions:

Subp. 2. **Program effectiveness reports report for continuing approval (PERCA).**

C. PERCAs must be reviewed according to the initial program review procedure in part 8705.2100, subpart 3, when:

(2) significant changes have been made to one or more methods courses such that the primary placement of at least 25 percent of standards resulted have been made; or...

Subp. 3. **Program effectiveness reports for continuing approval (PERCA); review procedures and approval decisions.**

A. PERCAs must be initially reviewed by board staff. PERCAs must be submitted to the program review panel for review when:

(3) the program has an existing status of "approval with a continuous focus area" and has failed to **fully** address its continuous focus area;

(4) the program has an existing status of "probationary"; or

(5) the program has failed to **fully** meet the requirements set forth by a required interim report.

The revisions define what type of changes would be significant enough to trigger an external review. This additional language is **needed and reasonable** as courses should be updated periodically as part of continuous improvement work. When there are significant changes, though, it is **needed and reasonable** for the Board to review a program for its continued compliance to standards.

The revisions will not make the adopted rules substantially different from the proposed rules because they merely add clarification to a process.

Program Review Panel (PRP) Membership.

Summary of comment(s)

Several commenters urged the Board to reconsider the makeup of the Program Review Panel (PRP), specifically recommending language from Draft 4, which did not call out specific organizations.

Response

After considering these comments, on August 28, 2020, the Board adopted the following revisions:

PRP membership ~~shall~~ must include but is not limited to representation from ~~organizations including, but not limited to,~~ the Professional Educator Licensing and Standards Board, Minnesota Association of Colleges for Teacher Education, ~~the Minnesota Department of Education~~ approved alternative preparation providers, and Education Minnesota, and varying types of teacher preparation and teacher advocacy organizations.

The Board debated at length whether to remove the references to the Minnesota Association of Colleges for Teacher Education (MACTE), which represents Minnesota's teacher preparation programs based in a college or university, and Education Minnesota, which represents over 80,000 teachers in Minnesota. The Board believed that the PRP, as only a recommending body that does not make final programmatic decisions, required the expertise and perspective of established organizations that are closely tied to the work of licensure and program standards in Minnesota and therefore choose to leave both entities a part of the Program Review Panel.

The Board did adopt revisions that replaced "approved alternative preparation providers" with "varying types of teacher preparation" to ensure that alternative providers were included as well as a mix of institutes of higher education (i.e. state systems, private colleges, university system) and programmatic models (i.e. residency, online). The Board also added "teacher advocacy organizations" to ensure organizations that represent teachers who are not Education Minnesota members or bring unique perspective to programmatic review would be represented in the review panel.

The current composition of the Program Review Panel has served the state of Minnesota exceptionally well. Currently, MACTE holds nine seats on the PRP and each year, MACTE recruits three new members for the PRP to serve a three year term, which provides both continuity and new perspectives. Education Minnesota has one representative on the PRP, who has the unique position of not being a peer of a preparation provider and serves as an advocate for teachers. Having a PELSB member serve on the PRP

allows a Board member to have oversight of the PRP and communicate the PRP discussions to the full Board. Though current rule doesn't require it, there has been a seat for alternative teacher preparation providers since at least 2017 to ensure that perspective is included.

Currently, the PRP generates very thoughtful recommendations. PRP members are diligent in their preparations for each meeting, spending as much as 40 hours prior to each meeting and then traveling from around the state to gather for half and full day meetings. The PRP has robust discussions about the meeting of standards, program effectiveness, and discretionary variance requests.

Finally, the Board wants to note that the membership set forth in rule is not limited to the organizations stated.

Other

Title II Report Card.

Summary of comment(s)

One commenter expressed concerns about tying a program's approval status with its federal Title II status.

Response

In response to this comment, on August 28, 2020, the Board adopted the following revisions:

B. (2) The board may ~~must~~ grant continuing approval with ~~continuous improvement~~ focus areas for ~~two three~~ years when the program report revealed that one or more standards, rules, or candidate performance measures were not in compliance with board criteria, including when less than 70 percent of candidates meet board-adopted thresholds on state-required examinations and board-adopted performance assessments... ~~For federal Title II reporting, the board must identify the program as "at risk of low performing" in the state report card.~~

C. (3) The board may grant probationary approval ~~must place a program on probation~~ for up to two years when ~~a the~~ program does not demonstrate acceptable progress on focused continuous improvement plans. Probationary ~~approval~~ approval status authorizes the program to continue with one year to demonstrate progress on identified unmet standards, rules, or candidate performance measures. During the first year a program is on probation, the board must identify the program as "at risk of low performing" in the state Title II report card. After one year, and based on a written progress report, the board may grant a second one-year extension of the probationary approval status prior to discontinuing the identified program. ~~Students Candidates~~ enrolled in a formerly approved program that is placed on probationary ~~approval~~ approval status must be notified of the program's status. Probationary status may result in federal reporting or financial aid implications or may impact other accreditations. For federal Title II reporting, During the second year a program is on probation, the board must identify the program as "low performing" in the state Title II report card.

The revisions modify the federal Title II reporting policy, such that a program's Title II reporting status will be changed to "at risk of low performing" and then "low performing" only after the program has been placed on probation.

"Under Title II of the Higher Education Act, teacher preparation providers must annually collect and submit information to their respective states. States, in turn, submit annual report cards on teacher

preparation and credentialing to the U.S. Department of Education.”¹⁶ The requirements that the Board identify programs as “at risk of low performing” after one year on probation and “low performing” after two years on probation is **needed and reasonable** to ensure alignment with Federal reporting guidelines within Title II.

National Accreditation.

Summary of comment(s)

PELSB proposes a new rule part to standardize and streamline the approval process for providers with accreditation from a board-approved national accrediting body. One stakeholder commented that the national accreditation option would not benefit alternative teacher preparation programs in the same way as traditional programs or non-conventional programs, which are based in higher-education institutions. (See [Comment 18](#)).

Response

The Board did not adopt revisions in response to this comment. Several board-approved providers hold national accreditation from the Council for the Accreditation of Education Preparation (CAEP) and the Association for Advancing Quality in Educator Preparation (AAQEP). Both of these accrediting bodies grant accreditation to providers based in an institution of higher education as well as alternative preparation providers. This rule means that for providers that already have national accreditation, they would not need to duplicate their accreditation work. Additionally, if a national accrediting body specifically for alternative preparation providers sought board approval, providers could seek accreditation from that entity and utilize the same streamlined processes.

Effective Dates.

Summary of comment(s)

PELSB proposes several effective dates, which vary in order to ensure providers and programs have the necessary time to meet the new standards and requirements. Several stakeholders submitted comments indicating the effective date should be lengthened (See [Comment 15](#) and [Comment 19](#)).

Response

After considering these comments, on August 28, 2020, the Board adopted the following revisions:

EFFECTIVE DATES.

(a) This chapter goes into effect on July 1, 2022. Units may choose to meet standards and requirements in this chapter prior to July 1, 2022.

(b) Organizations seeking initial unit approval or initial program approval must meet the standards in this chapter effective ~~January 1, 2021~~ July 1, 2021. Organizations may choose to meet the standards in this chapter prior to ~~January 1, 2021~~ July 1, 2021.

~~(b) A unit must meet the standards in parts 8705.1010 and 8705.1100 by the date of the unit's first site visit occurring on or after July 1, 2022. The unit may choose to meet the standards in this chapter prior to July 1, 2022.~~

¹⁶ https://title2.ed.gov/Public/46608_Final_Title_II_Infographic_Booklet_Web.pdf.

~~(c) A unit must meet the standards in parts 8705.2000 to 8705.2200 for each program seeking continuing approval by the date of the program's first PERCA submission occurring on or after July 1, 2020.~~

~~(d)~~ (c) Standard 24 in part 8705.1010, subpart 5, is effective three years after the date of adoption.

It is **needed and reasonable** to push back the effective dates as this rulemaking effort took longer than originally anticipated. Additionally, it is reasonable to have these rules go into effect for all providers at the same time, so providers and candidates around the state have the same expectations.

Technical corrections or other changes.

On August 28, 2020, the Board adopted the following revisions:

Line	Revision	Needed & reasonableness
15.7	Before “professional dispositions” add “unit-determined”	The Board adopted the phrase “unit-determined” to clarify that providers continue to be responsible for stabling their own set of required dispositions and monitoring candidates for enactment of those dispositions.
26.9	<p><u>Subp. 2. Standards.</u> A teacher preparation provider that is accredited by a board-approved national education accreditation agency is eligible for unit approval from the board by demonstrating compliance may comply with the following subset of standards in part 8705.1010:</p> <ul style="list-style-type: none"> <u>A. Standard 2;</u> <u>B. Standard 9;</u> <u>C. Standard 11;</u> <u>D. Standard 12;</u> <u>E. Standard 13;</u> <u>F. Standard 14;</u> <u>G. Standard 18;</u> <u>H. Standard 20;</u> I. Standard 23; J. Standard 24; K. Standard 26; 	The Board determined that all teacher educators must meet the qualifications set forth in standard 23 and 24, including units with national accreditation by a board-approved national accreditation agency.

Line	Revision	Needed & reasonableness
	JL . Standard 27; and KM . Standard 28.	
34.1	After “(a)” add “the program provides”	The Board adopted language “the program providers” to eliminate a drafting error and to ensure the rule language is clear.
48.20	Replace “approved with focus areas” with “continuing approval with focus areas”	The Board adopted revisions to the name of an approval status to ensure consistency throughout rule. This revision is needed and reasonable to ensure it is clear what a provider’s approval status could be moved to if a provider receives the requirement to complete and interim report.

Letter from Judge Eric L. Lipman.

Summary of comment(s)

In a letter dated August 21, 2020, Judge Eric L. Lipman provided feedback on the proposed rule changes (see [Letter](#)).

Response

In response to Judge Eric. L. Lipman’s drafting comments, the Board adopted the following revisions on August 28:

Line	Revision
6.11	Replace “and curriculum” with “curricula”
10.21	Replace “candidate’s” with “required”
12.3	Replace “candidate’s” with “required”
20.4	<u>C. At least 12 months prior to the site visit, the provider must provide a self-study, including supplemental evidence demonstrating compliance with standards, for review...</u>
20.9	Replace “areas of deficit” with “deficiencies”

Line	Revision
20.13	<u>The review team must conduct a site visit to verify evidence of current compliance with the standards in this chapter...</u>
20.20	<u>(2) Met with Concern: when the substance of a standard is evidenced through narrative, supplemental evidence, or interviews, but the review team is concerned about ongoing compliance with the relevant standards with the level of depth the standard is met. The review team must provide a comment on each gap standard that is "Met with Concern";</u>
21.4	<u>(4) Not Met: when compliance with all or part of a standard is not demonstrated all or part of a standard is not evidenced.</u>
21.24	<u>A review team must conduct a site visit to verify evidence of compliance with the standards in this chapter...</u>
23.16	<u>B. The review team must conduct a site visit to verify evidence of compliance with the standards in this chapter...</u>
23.22	<u>(2) Met with Concern: when the substance of a standard is evidenced through narrative, supplemental evidence, or interviews, but the review team is concerned about ongoing compliance with the relevant standards with the level of depth the standard is met. The review team must provide a comment for each standard that is "Met with Concern";</u>
25.6	<u>The disapproval action must state the reasons for disapproval and provide a plan for candidates currently enrolled to complete the licensure programs by a specified date stipulate a termination date that accommodates candidates currently enrolled in licensure programs within the unit.</u>
25.19	<u>If agreement is not reached, or if input is not provided, regarding review team membership, the board staff shall appoint the review team members.</u>
31.2	Replace "show evidence of" with "demonstrate"
32.3	After "conflicts of interest" add "as directed by the board's executive director"
39.3	<u>(b) attestation that all candidates must attempt board-approved content and pedagogy exams prior to recommendation, and such data will be remitted to the Board to demonstrate for data on program efficacy;</u> <u>(c) attestation that all candidates must submit a complete board-adopted performance assessment prior to recommendation, and such data will be remitted to the Board to demonstrate for data on program efficacy; and</u>

Line	Revision
46.1	<p>D. (4)-The board may grant discontinued <u>must discontinue a program status</u> when the board determines that required standards for program approval are unmet. The program will be discontinued and failure of the program to meet the requirements and standards in this chapter, chapter 8710, or Minnesota Statutes, chapter 122A, results in an inability to prepare candidates for licensure. When discontinuing a program, the board will must establish a timeline to accommodate candidates enrolled in the program. No new students candidates may be admitted into a discontinued program after the date the board acts to discontinue the program. The provider must submit to the board a list of candidates enrolled in the program, and their expected graduation completion dates, <u>and a plan for those candidates to complete the program by a specified date.</u> The provider must individually notify those candidates in writing of the program's discontinuation and their program completion options. <u>The unit may not apply for program approval for a program that has been discontinued until at least three years have passed since the board action.</u></p>
48.5	After “the rationale” add “for any alternative practices or measures”
48.6	<u>If the discretionary variance request is denied, the board shall provide a written determination listing the reason for the denial.</u>

These revisions do not make substantive changes; rather, they clarify the intent of the rule.

Revisions to the proposed rules do not make the rules substantially different from the proposed rules

The adopted revisions to the proposed rules do not make the rules substantially different from the proposed rules because they are within the scope of this rulemaking as announced in the Notice of Hearing. The revisions include corrections, clarifications, and improvements based on comments submitted to the Board. These amendments are a logical outgrowth of the contents of the Notice of Hearing and to the comments submitted in response to the Notice of Hearing.

Conclusion

This document constitutes the Board’s response to comments received prior to the rules hearing, which was held on September 1, 2020.

In conclusion, the Board believes that this response, the Board’s SONAR, and supporting exhibits demonstrate that the proposed rules are needed and reasonable and in accordance with all regulatory and legal requirements. The Board respectfully requests that the proposed rules be approved. If you have questions about the Board’s response, please contact Michelle Hersh Vaught at Michelle.Vaught@state.mn.us.