

35856 Professional Educator Licensing and Standards Board (Initial Comment Period)

Closed Sep 21, 2020 · Discussion · 13 Participants · 1 Topics · 13 Answers · 0 Replies · 2 Votes

13

PARTICIPANTS

1

TOPICS

13

ANSWERS

0

REPLIES

2

VOTES

SUMMARY OF TOPICS

SUBMIT A COMMENT

 13 Answers · 0 Replies

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Stacy Ernst · Citizen · (Postal Code: unknown) · Sep 01, 2020 5:08 pm

 0 Votes

TO: Honorable Administrative Law Judge Eric L. Lipman
FR: University of Minnesota System-wide Teacher Education Unit Deans, Chairs and Directors
DT: September 1, 2020
RE: OAH Docket No. 8-9021-35856 for R4576

The following is submitted on behalf of the teacher education unit leaders from the four University of Minnesota campuses — Crookston, Duluth, Morris, and Twin Cities. The UMN system offers PELSB-approved undergraduate and graduate programs to prepare new teachers for Minnesota's highly diverse student population and school contexts. As a UMN system, we have remaining concerns to bring to your attention regarding R4576 as proposed.

Please see the attached PDF with our full written statement, including details not shared during our oral statement at the hearing today.

Sincerely,

Stacy Ernst, Ph.D. Director of the Office of Teacher Education (OTE) in CEHD
University of Minnesota Twin Cities

Deborah Dillon, Ph.D. Senior Associate Dean of Graduate and Professional Programs
College of Education and Human Development (CEHD)
University of Minnesota Twin Cities

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Cari Maguire, Ph.D. Coordinator of Continuous Improvement (OTE) in CEHD
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Shari Daniels, Ph.D. Assistant Professor, Teacher Education
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Kristen McMaster, Ph.D. Chair, Department of Education Psychology in CEHD
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Michelle L. Page, Ph.D. Chair, Division of Education
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Jill A. Pinkney Pastrana, Ph.D. Dean, College of Education and Human Service Professions
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Mark Vagle, Ph.D. Chair, Department of Curriculum and Instruction in CEHD
University of Minnesota Twin Cities

Joe Nathan · Citizen · (Postal Code: unknown) · Sep 08, 2020 10:32 am

 0 Votes

Dear Judge Lipman and Members of the Professional Educator Licensing and Standards (PELSB) Board:

The undersigned diverse group of 53 researchers, educators, and community leaders (including adults and high school/college students) urge that service-learning be included in the preparation of all Minnesota K-12 teachers. This is in response to "Proposed Changes to the Rules Governing Teacher Preparation (R-4576)." We are proposing an addition to Minnesota Rules, Chapter 8705, Unit Standards, Subpart 1.

Our recommendations are based on extensive research, summarized below.

In this brief note, we provide specific recommendations, summarize supporting research, explain how service-learning has value beyond project and inquiry-based learning and cite relationships between service-learning and INTASC standards.

We believe that PELSB does have the statutory authority to adopt rules and it is meeting the legal and procedural requirements to adopt rules.

We strongly suggest an addition to 8705 Unit Standards, Subpart 1. Our specific recommendations are that Minnesota teacher preparation institutions be required to insure that each K-12 teaching candidate:

- Understands the rationale for service-learning;
- Engages in at least one service-learning project as part of their preparation; and
- Learns how service-learning can be applied to the age of students and curricula area(s)

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they are preparing to teach.

Service-learning can be used to help prospective teachers achieve at least four of the INTASC Standards: development of critical thinking; subject matter knowledge; fostering relationships with the larger community to help students learn; and creating instructional opportunities adapted to diverse learners. (Anderson)

As an active learning pedagogy, service-learning goes beyond project-based and inquiry-based learning in important ways.

1. Service-learning engages young people as persons with knowledge, creativity, and assets who can, even at age 5, help improve their communities. Students take an issue that matters to them and their community and explore solutions to addressing that issue through the application of their academic curricula. Through service-learning, students create and implement solutions to address societal issues that matter. There are numerous examples of service-learning involving youngsters, even at the kindergarten level, such as students who studied area and perimeter in mathematics, and designed, gathered materials for and helped built a playground for their school. The day when six donated truckloads of sand arrived, which five to seven students had obtained, was an unforgettable day for these youngsters.

2. Service-learning helps young people see connections between what they are studying in the classroom and efforts to improve their community, state, nation and in some cases world.

3. Service-learning requires an explicit component of reflection through which students analyze the nature of societal issues, the ways in which their academic subject(s) informed their understanding of the issue, what worked well and what did not, and what actions they might take in the future as active contributors to society.

4. When done well, service-learning produces a powerful, positive and productive conclusion among participating students that they have tried, and in many cases succeeded, in making the world better.

Research published as recently as March, 2020, and going back twenty years, documents the deep value of service-learning. A national report released in March, 2020 concluded that “students who participate in service-learning opportunities demonstrate better academic performance, a deeper understanding of civic responsibility, and a stronger ethic of service.” (National Commission). Based on this research, the Commission recommended that “IHEs (Institutes of Higher Education) and nonprofit organizations explore ways to integrate quality, research-based civic education, and service-learning methodologies into curricula, consider best practices, and prepare teachers to use service-learning methodologies.(National Commission, 2020, p. 20)

In 2010, the international Organization for Economic Cooperation and Development (OECD) conducted a comprehensive research study of the teaching practices that are most effective for enhancing student learning. Their research found that student learning is highest when students (at all levels) engage in educational experiences that are:

1. authentic (students learn about real issues that matter to them and the work/projects they produce make a difference to the real world, as opposed to producing work only for the teacher's eyes).
active (students are actively rather than passively engaged in the learning process;
teaching is student-centered)

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2. constructivist (students construct their understanding through higher order thinking by being provided scaffolds on which to build their understanding, rather than being fed bit and pieces of information to memorize)

3. cooperative (students learn through teamwork and collaboration and exchange of ideas, knowledge, and perspectives)

4. empowering (students have opportunities to apply their assets that helps build their self-efficacy and empowers them to want to learn more)

5. expands boundaries (students have opportunities to venture outside their comfort zones to explore new vistas that open up their world view and understanding)

6. personalized (students connect learning activities to issues that matter to them and have personal meaning; the more students are personally interested in something, the more they invest themselves in understanding it). (OECD 2010)

Of all of the pedagogies that OECD reviewed, service-learning was found to be the only pedagogy that met all of the aforementioned criteria. (Furco, 2010).

A report based on recommendations from community leaders and higher education faculty urged that prospective educators are more likely to learn how and why to include service-learning in their work if they experience service-learning in their preparation. (Shumer) Thus, we urge that pre-service include, not only learning about, but having at least one service learning experience.

Training prospective teachers can have important positive results for faculty, as well as students. Preservice teachers trained in service-learning have showed gains in trust of students, in how well-prepared they are to use effective teaching skills, and a significant gain in a sense of teaching efficacy and commitment to teaching. (Sikes and Root)

We believe that service-learning can enhance and strengthen preparation in each of the following proposed Standards of Effective Practice:

- develop learning experiences that engage students in collaborative and self-directed learning and that extend students' interactions with ideas and people locally and globally (Standard 18)
- collaborate with colleagues to integrate cross-disciplinary skills and content throughout instruction (Standard 22)
- collaborate with students to design and implement relevant learning experiences, identify their strengths, and access family and community resources to develop their areas of interest (Standard 33)
- effectively establish and manage small-group work that fosters collaboration, semi-independent work, and accountability for learning (Standard 38)
- be able to actively seek professional, community, and technological resources, within and outside the school, as supports for analysis, reflection, and problem solving (Standard 64)
- The array of research led the W.K. Kellogg Foundation to conclude that "meaningful service to the community, combined with curriculum-based learning, builds stronger

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academic skills, encourages lifelong civic commitment, and improves workplace and personal development skills among youth.” (Anderson)

- Findings from other research reveal that “Participation in high quality service-learning can increase students’ knowledge about government, commitment to communities and service, sense of civic responsibility, increased civic leadership, and acceptance of diversity and cultural differences.” (Furco)
- The longitudinal study of service experiences by four professors at Stanford found that sustained service-learning and related experiences are a crucial factor in young people’s development of a sense of “civic purpose,” or lifelong commitment to the common good beyond their particular self- interests. (Malin)
- A meta-analysis of 62 studies involving 11,837 students indicated that, compared to controls, students participating in SL programs demonstrated significant gains in five outcome areas: attitudes toward self, attitudes toward school and learning, civic engagement, social skills, and academic performance. Mean effects ranged from 0.27 to 0.43. (Celio et al.)

For these reasons, we strongly urge that all prospective Minnesota K-12 educators, as they prepare to teach, build an understanding of the rationale, pedagogy and philosophy of service-learning, build personal experience with the practice, and learn how to apply the pedagogy and principles of service-learning in their classrooms to enhance the educational experiences of students.

Immediately below are names and references to the research cited in the statement above.

Following the “references cited” is a brief research summary prepared by Dr. Andrew Furco, Professor of Education, and Associate Vice President for Public Engagement, University of Minnesota. We welcome any questions that this document raises. Thank you for considering these recommendations.

Sincerely,

Sue Aberholden, MPH, Executive Director NAMI Minnesota

Candice M. Ames, PhD, Pine City, Mn, 50 year Mn public school educator

Terri Anderson, former Waubun-Ogema-White Earth school board member school board member, now Executive Director, Naytawaush Community Charter School

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Laura Bloomberg, PhD, Professor and Dean, Humphrey School of Public Affairs

Harry Boyte, Senior Scholar, Augsburg College, Founder of Public Achievement

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Julie Bascom, Director, Training & Leadership Development, National Youth Leadership Council

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Jane Prince, St Paul City Councilmember, Ward 7

Khalique Rogers, consultant to Youthprise and University of Minnesota student

Susan Root, Ph.D. former Research Director, National Youth Leadership Council

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Dr. B. Charvez Russell, Executive Director, Friendship Academy of the Arts

Sondra Samuels, President & CEO, Northside Achievement Zone

Rep. Steve Sandell, MN House of Representatives

Jim Scheibel, Professor of Practice, Hamline University, former mayor, St Paul

Karen Seashore (Louis), PhD Regents Professor of Organizational Leadership, Policy and Development, University of Minnesota

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Nathan Streng, Senior Learning Designer, Fielding International

Rashad Turner, Founder and Executive Director, Minnesota Parents Union

Mike Van Keulen, Executive Director of Open Path Resources

Brandon Wait, Executive Director, Paladin Career & Technical High School

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Scott Wurdinger, PhD Professor Emeritus, Experiential Learning, MSU, Mankato

Samuel Yigsaw, PhD and Executive Director, Higher Ground Academy

REFERENCES CITED

Anderson, Jeffrey B., "Learning In Deed: Service-Learning and Preservice Teacher Education" (2000). Service Learning, General. Paper 16.
<http://digitalcommons.unomaha.edu/slceslgen/16>

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Celio, Christine I., Durlak, Joseph, and Dymnicki, Allison, "A Meta-analysis of the Impact of Service-Learning on Students," *Journal of Experiential Education*, (2011, Volume 34, No. 2) pp. 164-181.

Furco, Andrew, "Service Learning Research Summary", 2019, (please see below)
Malin, H., et al, "Civic Purpose: An Integrated Construct for Understanding Civic Development in Adolescence," *Human Development* , (2015;58:103-130)

National Commission of Military, National and Public Service, "Inspired to Serve," March 2020, accessible at www.inspire2serve.gov

OECD Centre for Educational Research and Innovation, "Nature of Learning, The: Using Research to Inspire Practice, 2010, Accessible at https://read.oecd-ilibrary.org/education/the-nature-of-learning_9789264086487-en#page5

Shumer, Robert D. , "Teacher Education and Service Learning," (June 1992) Accessible at <https://digitalcommons.unomaha.edu/cgi/viewcontent.cgi?article=1028&context=slceslgen>

Sikes, Kathy, and Root, Susan, "Preparing Tomorrow's Teachers with Transformative Practice: Engaging All Learners through Service Learning, St Paul, October 2011

Research summary by University of Minnesota Professor and Associate Vice President for Public Engagement Andrew Furco, PhD Feb, 2019

Academic Achievement and Cognitive Learning

Participation in high quality service-learning experiences is associated with improved subject matter learning and academic performance, greater academic engagement, increased motivation for learning, improved school attendance and grades, and engagement in higher order thinking.

Improved Subject Matter Learning and Performance:

K-12 students who engage in service-learning have outperformed non service-learning students on standardized state examinations (reading and language arts) and classroom academic content learning assessments (science, mathematics and social studies).(1)

School Success Indicators:

Studies have found positive associations between K-12 students' service-learning participation and reductions in disciplinary problems, improvements in students' school attendance, improvements in students' grades and grade-point averages and increases in student retention in school (2)

Learning Commitment, Engagement, and Motivation:

When done well, service-learning activities can enhance students' motivation toward school and help students develop more positive attitudes toward learning. Service-learning exposes students to factors and opportunities that are known to mediate academic achievement, including opportunities for students to act autonomously and take on more complex tasks(3)

Civic Development and Commitment to Communities

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Participation in high quality service-learning can increase students' knowledge about government, commitment to communities and service, sense of civic responsibility, increased civic leadership, and acceptance of diversity and cultural differences. (4)

Personal and Social Development

Service-learning participation is consistently found to be an effective instructional strategy for developing students' self-esteem, self-efficacy, perseverance, resilience, leadership skills, and a positive transition to adulthood. Research studies also suggest that service-learning is an effective practice for enhancing students' social networks, relationships with peers and adults, and social capital. (5)

Career and Vocational Development: Several studies have found service-learning as a vehicle for students to explore career options and develop career-plans and interview skills. (6)

Character Development: When combined with character development curricula, service-learning participation has been found to enhance character traits such as cooperation, responsibility and integrity, especially among elementary school students. (7)

CONSIDERATIONS:

- Not all service-learning experiences produce positive outcomes for participants. Positive outcomes manifest when service-learning includes particular practices, such as high integration of academic learning with service activities, meaningful service experiences, intentional reflection, community reciprocity, adequate duration, student-centered approaches, and other components associated with high quality service-learning practice.
- Within K-12 education, it is estimated that only one in eight students are exposed to this instructional practice.
- It is worth noting that within higher education, service-learning is widely considered a "high impact instructional practice" (Kuh, 2008), and in turn, more than 80% of all colleges and universities in the United States offer opportunities for students to enhance their academic and civic learning through service-learning.

REFERENCES

- 1) Klute, M. M., & Billig, S. H. (2002). The impact of service-learning on MEAP: A large-scale study of Michigan Learn and Serve grantees. Denver, CO: RMC Research Corporation.
- McBride, A.M., Robertson, A., & Chung, S. (2014). Assessing the impacts of service learning on middle school students: Wyman's Teen Outreach Program. St. Louis: Center for Social Development.
- Meyer, S., Billig, S., & Hofschire, L. (2004). The impact of K-12 school-based service-learning on academic achievement and student engagement in Michigan. In M. Welch & S. Billig (Eds.), *New perspectives in service-learning: Research to enhance the field*. Greenwich, CT: Information Age Publishing.
- Newman, J., Danzler, J. & Coleman, A. (2015). Science in action: How middle school students are changing their world through STEM service-learning projects. *Theory into Practice*, 54(1), 47-54, doi: 10.1080/00405841.2015.977661.
- 2) Bridgeland, J. M., Dilulio, J. J., & Morison, K. B. (2006). *The silent epidemic: Perspectives of high school dropouts*. Civic Enterprises & Peter D. Hart Research

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Associates.

Farber, K. & Bishop, P. (2017). Service learning in the middle grades: Learning by doing and caring. *RMLE Online*, 42(1), 1-15, doi: 10.1080/199404476.2017.1415600 .

Follman, J., & Muldoon, K. (1997). Florida Learn & Serve 1995-96: What were the outcomes? *NASSP Bulletin*, 81, 29.

Laird, M. & Black, S. (1999). Service-learning evaluation project: Program effects for at risk students. Oakbrook, IL: Lions Quest.

3) Brown, S., Kim, W., & Pinhas, S. (2005). Texas Title IV service learning evaluation, 2004-05. Denver, CO: RMC Research Corporation.

Furco, A. (2002). Is service-learning really better than community service? A study of high school service program outcomes. In A. Furco & S. Billig (Eds.), *Service-learning: The essence of the pedagogy*. Greenwich, CT: Information Age Publishing.

Hecht, D. (2002). A study of the effects of participation in the helper model of service-learning in early adolescence. Unpublished report,

Scales, P. C., Blyth, D. A., Berkas, T. H., & Kielsmeier, J. C. (2000). The effects of service-learning on middle school students' social responsibility and academic success. *Journal of Early Adolescence*, 20 (3), 332-358.

Scales, P. C., Roehlkepartain, E. C., Neal, M., Kielsmeier, J. C., & Benson, P. L. (2006). Reducing academic achievement gaps: The role of community service and service learning. *Journal of Experiential Education*, 29, 38-60.

4) Flanagan, C. A. (2004). Volunteerism, leadership, political socialization, and civic engagement. *Handbook of adolescent psychology*, 2, 721-745.

Kahne, J. E., & Sporte, S. E. (2008). Developing citizens: The impact of civic learning opportunities on students' commitment to civic participation. *American Educational Research Journal*, 45(3), 738-766.

Melchior, A. & Bailis, L. N. (2002). Impact of service-learning on civic attitudes and behaviors of middle and high school youth: Findings from three national evaluations. In A. Furco & S. H. Billig (Eds.), *Advances in service-learning research: Vol.1. Service-learning: The essence of the pedagogy* (pp. 201-222). Greenwich, CT: Information Age Publishers.

Perry, J. L., & Katula, M. C. (2001). Does service affect citizenship? *Administration & Society*, 33(3), 330-365.

Richards, M.H., Sanderson, R.C., Celio, C.I., Grant, J.E., Choi, I., George, C., & Deane, K. (2013). Service-learning in early adolescence. Results of a school-based curriculum. *Journal of Experiential Education*, 36(1), 5-21. doi: 10.1177/1053825913481580.

5) Farber, K. & Bishop, P. (2017). Service learning in the middle grades: Learning by doing and caring. *RMLE Online*, 42(1), 1-15, doi: 10.1080/199404476.2017.1415600 .

Furco, A. (2002). Is service-learning really better than community service? A study of high school service program outcomes. In A. Furco & S. Billig (Eds.), *Service-learning: The essence of the pedagogy*. Greenwich, CT: Information Age Publishing.

Martin, S., Neal, M., Kielsmeier, J., & Crossley, A. (2006). The impact of service-learning on transitions to adulthood. In M. Neal & J. Kielsmeier (Eds.). *Growing to Greatness: The State of Service-Learning Project* (pp. 4-24). St Paul, MN: National Youth Leadership Council.

Richards, M.H., Sanderson, R.C., Celio, C.I., Grant, J.E., Choi, I., George, C., & Deane, K. (2013). Service-learning in early adolescence. Results of a school-based curriculum. *Journal of Experiential Education*, 36(1), 5-21. doi: 10.1177/1053825913481580.

Shumer, R. (2005). Service-learning research: What have we learned from the past. In M. Neal & J. Kielsmeier (Eds.). *Growing to Greatness: The State of Service-Learning Project* (pp. 48-53). St Paul, MN: National Youth Leadership Council.

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6) Furco, A. (2002). Is service-learning really better than community service? A study of high school service program outcomes. In A. Furco & S. Billig (Eds.), *Service-learning: The essence of the pedagogy*. Greenwich, CT: Information Age Publishing. G
Goodwin, A., Sonnert, G., & Sadler, P.M. (2015). The influence of out-of-school high school experiences on engineering identities and career choice. Paper presented at the Annual Conference and Exposition of the American Association of Engineering Educators.

7) Billig, S.H., Jesse, D., Broderson, R.M., & Grimley, M. (2008). Promoting secondary students' character development through service- learning. *Advances in Service-Learning Research*, 57-83.
Furco, A., Burton, L., Toussaint, D., Kent, K., & Glatze, K. (2010). Project Heart, Head, Hands (H3): A Language Arts-Based Character Education Program for Elementary Schools - Final Research Report. A report to the Partnership in Character Education Program. Submitted to the U.S. Department of Education, Washington, DC, 87 pages.

Jean Strait · Citizen · (Postal Code: unknown) · Sep 10, 2020 10:16 am

👍 1 Votes

September 10, 2020

Dear Judge Lipman,

I wanted to offer some post-hearing comments regarding the inclusion of service-learning in teacher education program. I am a long time teacher educator and researcher in Service-learning and work with teacher education programs and K-12 on service-learning initiatives. I am the co-editor of the *International Journal of Service-learning in Teacher Education* and wanted to offer support from our colleagues recent work to support the rules are needed and reasonable. I believe that PELSB does have the statutory authority to adopt rules and it is meeting the legal and procedural requirements to adopt rules.

I agree with my colleague's addition to 8705 Unit Standards, Subpart 1 specific recommendations for Minnesota teacher preparation institutions to be required to insure that each K-12 teaching candidate:

- Understands the rationale for service-learning;
- Engages in at least one service-learning project as part of their preparation; and
- Learns how service-learning can be applied to the age of students and curricula area(s) they are preparing to teach.

Below I offer current research from my colleagues Nelson, Crow and Tice (2019) to support the inclusion of service-learning to the current standards:

"In 1996, the National Commission on Teaching and America's Future issued a call to strengthen teacher preparation programs through a variety of reforms, including deeper candidate participation in clinical experiences. Since that time, teacher education programs throughout the country have made "significant headway" in incorporating the reforms, "creating stronger clinical practice, strengthening coursework around critical

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areas. . .and connecting this coursework directly to practice in much more extensive practice settings” (Darling-Hammond, 2010, p. 36). Many teacher preparation programs now require clinical experiences that are directly tied to coursework and engage preservice teachers with authentic teaching and learning collaborations, partnerships, and mentoring programs (Huang, 2006; Darling-Hammond, 2000). One strategy for linking teacher education coursework with field experiences is service-learning. Furco (2001) defines service-learning as “a teaching strategy that enhances students’ learning of academic content by engaging them in authentic activities in which they apply the content of the course to address identified needs in the local and broader community.” (p. 67). Teacher education experts have argued that service-learning can expose preservice teachers to new situations that could occur on the job, uncover obscure assumptions that might interfere with their ability to effectively teach all students, and engage them in solving real-world problems with professional and experienced consultants (Baldwin, Buchanan, & Rudisill, 2007). In effect, service-learning creates an opportunity for students and faculty to question, analyze, and process timely challenges occurring in the field in a collaborative setting that supports personal, social, and academic growth. “

And Coffey and Butler (2019) add this important information:

“Over the past 50 years, service-learning has become increasingly popular in colleges and universities in the United States and worldwide as an experiential learning pedagogy that engages students in authentic ways to understand curriculum and to develop a more in-depth understanding of the communities where they live (Shumer, 2017). Service-learning as a pedagogical approach has the potential to help university students to examine underlying social inequities and to seek ways to actively advocate for underserved populations (Mitchell, 2008). Service-learning has valuable potential for improving the understandings and experiences of novice teachers (Coffey, 2010). Wade (1995) surveyed a group of teachers-in-training and found several outcomes produced by service-learning. The majority of participants (82%) reported increased self-efficacy and almost 50% reported increased self-esteem. Among the service outcomes, the study revealed 67% of the candidates increased their knowledge. of others (usually not like them). These findings are encouraging and would be considered worthwhile. in most educational circles. Other research echoes Wade’s (1995) call to implement service in teacher training courses (Coffey, 2010; Cohen & Kinsey, 1994; Vadeboncoeur, Rahm, Aguilera, & LeCompte, 1996).

Throughout the literature, there are references to support the call for service in education programs. Swick (1999) points out that for both teacher education candidates and experienced teachers, service-learning provides a structure for several important realizations:

1. Supports professional growth in teacher education candidates as they gain a more comprehensive understanding of the “persona” of being a teacher, including the significant influence of teachers in the lives of children and families (Erickson & Anderson, 1997).
2. Allows interaction with professional role models, such as community leaders and teacher leaders (Waterman, 1997), which fosters leadership skill development.
3. Engages teachers in roles that encourage them to re-think how they respond to the totality of the lives of children and families (Alt, 1997).
4. Helps teachers reflect on the importance of serving all children (Erickson & Anderson, 1997). Swick (1999) further argues that candidate teachers learn meaningful approaches through the experiential and reflective service-learning activities in which they participate.

Furthermore, Tinkler, Hannah, Tinkler, and Miller (2015) suggest that service-learning in teacher education provides opportunities for candidates to analyze critically the oppressive structures embedded into our education system. Service-learning

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experiences can increase “preservice teachers’ exposure to diversity, to help re-focus attention on the needs of individual learners, and to assist candidates in understanding and questioning existing school structures” (Tinkler, Hannah, Tinkler, & Miller, 2015, p. 26), thus fostering the development of social justice goals.

Multiple studies suggest service-learning experiences that engage pre-service teachers in working with diverse populations have the potential to help future educators develop a sense of cultural competence that does not always emerge with regular student teaching experiences (Banks & Diem, 2008; Coffey, 2010; Mitchell, 2008). Hill-Jackson and Lewis (2011) recommend that teachers must learn to ask critical questions about the population they are teaching and understand how to better value their lived experiences within the classroom. Additionally, a report from the National Comprehensive Center for Teacher Quality and Public Agenda (Rochkind, Ott, Immerwahr, Doble, & Johnson, 2008) found that new teachers feel overwhelmingly underprepared for teaching students from diverse ethnic and racial groups. This research strengthens the connections between service-learning and developing justice-oriented dispositions in teacher education. Engaging in service-learning opportunities with diverse populations and including time for discussion and reflection might have the potential to prepare pre-service teachers for working with students from diverse ethnic, racial, linguistic, and socio-economic backgrounds (Coffey, 2010; Webster & Coffey, 2010). Research suggests that pre-service educators can make a difference in the world (Conklin, 2008), but without contextual understanding of the students they will teach one day, pre-service educators cannot develop the types of dispositions necessary to be justice-oriented teachers of urban youth. The Interstate Teach Assessment and Support Consortium (InTASC) offers standards for teacher education, which include standards that recognize the importance of critical dispositions (Council of Chief State School Officers, 2011). The InTASC standards also have been adopted by the Council for Accreditation of Educator Preparation (CAEP), the accrediting body for teacher preparation programs in the United States. According to InTASC Standard 2, pre-service teacher candidates must use “understanding of individual differences and diverse cultures and communities to ensure inclusive learning environments that enable each learner to meet high standards” (Council of Chief State School Officers, 2011, p. 11). This means that teacher candidates must demonstrate the types of dispositions that ensure they (a) believe all children can learn and be successful in school; (b) appreciate and respect the diversity of backgrounds and experience from which their students come, and (c) value the language and culture of students seeking to integrate these skills, talents, and abilities into student learning activities.

InTASC Standard 8 also attends to utilizing students’ funds of knowledge (Gonzalez, Moll, & Amanti, 2005) when planning for instruction. This standard supports a deepened awareness and understanding of the strengths of diverse learners, while requiring teacher preparation around value and commitment to accommodating students’ learning needs in the area of multiple forms of communication. Improving preservice teachers’ ability to recognize work-related problems and apply effective strategies and solutions to fundamental challenges in the field is at the crux of an effective college preparation. “ In addition, further research supports that preservice teachers abilities are increased through service-learning in these areas:

1. Intercultural awareness, cultural competency, and multicultural education
2. Learning to teach students with disabilities
3. Increased authentic learning experiences with English Language Learners ; and
4. Learning technology integration to solve real world problems

I strongly urge that all prospective Minnesota K-12 educators, as they prepare to teach, build an understanding of the rationale, pedagogy and philosophy of service-learning, build personal experience with the practice, and learn how to apply the pedagogy and principles of service-learning in their classrooms to enhance the educational experiences

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of students.

Thank you for your time and consideration,

Dr. Jean R. Strait
Executive Director
FACE- Foundation for the Advancement of Culture and Education

References

- Alt, M. N. (1997). How effective an educational tool is community service? National Association of Secondary School Principals Bulletin, 81(591), 8-17.
- Cohen, J., & Kinsey, D. F. (1994). Doing good and scholarship: A service-learning study. Journal-ism Educator, 48(4), 4-14.
- Coffey, H. (2010). 'They taught me': The benefits of early community-based field experiences in teacher education. Teaching and Teacher Education, 26(2), 335-42.
- Coffey, H. & Butler, B. (2019). Developing Social Justice through Service-learning: The Potential of University-School Partnerships for Fostering Justice-Oriented Dispositions among Students of Color and Males through Service-learning Opportunities in Urban Schools, International Journal of Service-learning in Teacher Education, 6, 14-27.
- Conklin, H. (2008). Modeling compassion in critical, justice-oriented teacher education. Harvard Educational Review 78(4), 653-674.
- Council of Chief State School Officers. (2011, April). Interstate Teacher Assessment and Support Consortium (InTASC) Model Core Teaching Standards: A Resource for State Dialogue. Washington, DC: Author [sic].
- Darling-Hammond, L. (2000). Teacher quality and student achievement: A review of state policy evidence. Education Policy Analysis Archives, 8(1), 1-44.
- Darling-Hammond, L. (2010). Teacher Education and the American future. Journal of Teacher Education, 61(2), 35-47.
- Furco, A. (2001). Advancing service-learning at research universities. New Directions for Higher Education, 114, 67-78. [http:// onlinelibrary.wiley.com/doi/10.1002/he.15/ abstract](http://onlinelibrary.wiley.com/doi/10.1002/he.15/abstract)
- González, N., Moll, L., and Amanti, C. (2005). Funds of knowledge: Theorizing practices in households, communities, and classrooms. New Jersey: Lawrence Erlbaum Associates, Publishers.
- Erickson, J. A., & Anderson, J. B. (Eds.) (1997) Learning with the community: Concepts and models for service-learning in teacher education. Washing- ton, DC: American Association For Higher Education.
- Hill-Jackson, V., & Lewis, C. (2011). Service loitering : White pre-service teachers preparing for diversity in an underserved community, In T. Stewart & N. Webster (Eds.), Problematizing service-learning: Critical reflections for development and action. Charlotte, NC: Information Age
- Huang, G. H. (2006). Fostering active-learning in a teacher preparation program. Education, 127(1), pp. 31-38.
- Nelson, L., Crow, M., & Tice, K. (2019). How Active Learning Strategies Can Improve Efficacy and Critical Thinking Skills in a Service-Learning Course. International Journal of Service-learning in Teacher Education, 6, 1-13.
- Mitchell, T. (2008). Traditional vs. critical ser- vice-learning: Engaging the literature to differentiate between two models. Michigan journal of service-learning. 14(2), 50-65.
- Rochkind, J., Ott, A., Immerwahr, J., Doble, J., & Johnson, J. (2008). Lessons learned: New

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teachers talk about their jobs, challenges and long-range plans. A Report from the National Comprehensive Center for Teacher Quality and Public Agenda, Issue 3.

Shumer, R. (2017). Where's the wisdom in service-learning? Charlotte, NC: Information Age Publishing, Inc.

Swick, K. J. (1999). Service-learning helps future teachers strengthen caring perspectives. *The Clearing House*, Sept/Oct, 29-32.

Tinkler, B., Hannah, C., Tinkler, A., & Miller, E. (2015). The impact of a social justice service-learning field experience in a social foundations course. *Critical Questions in Education*, 6 (1), 16-29.

Vadeboncoeur, J. A., Rahm, J., Aguilera, D., & Le-Compte, M. D. (1996). Building Democratic character through community experiences in teacher education. *Education and Urban Society*, 28(2), 189-207.

Wade, R. C. (1995). Developing active citizens: Community service-learning in social studies teacher education. *The Social Studies*, 86(3), 122-127.

Waterman, A. S. (1997). *Service-learning: Applications from research*. New Jersey: Lawrence Erlbaum Associates.

Webster, N. & Coffey, H. (2010) A critical connection between service learning and urban communities: Using critical pedagogy to frame the context. In Trae Stewart and Nicole Webster (Eds.). *Problematizing service learning: Critical reflections for development and action*. (pp. 245-262). Charlotte: Information Age Publishing.

Danyika Leonard · Citizen · (Postal Code: unknown) · Sep 18, 2020 10:08 am
👍 0 Votes

Honorable Administrative Law Judge Eric L. Lipman
Members of the Professional Educator Licensing & Standards Board (PELSB)
RE: OAH Docket No. 8-9021-35856 for R4576

September 18, 2020

Judge Lipman and Members of the Board,

My name is Danyika Leonard and I am the Policy Director for Education Evolving. Education Evolving is a non-partisan education organization that works to advance student-centered learning for all students, by supporting teachers who are designing and leading schools, and by advocating for policy that allows for thoughtful innovation in schools across the state. I am commenting on proposed changes to the rule 4576, governing teacher preparation. Specifically, teacher educator requirements and the program review panel.

Teacher Educator Requirements

On Friday August 28th, there was a special PELSB board meeting where changes were made to the teacher educator and methods instructor requirements. The changes to these requirements are incongruent with the current Minnesota Statute 122A.2451, which directs the board to use states nontraditional criteria to determine qualification of program instructions, including permitting instructors to hold a "baccalaureate degree only." This change could unintentionally impede potential teachers of color and American Indian teachers from becoming teacher educators. It is especially troubling for teachers

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who have obtained their licensure through the portfolio process. This rule change will make them ineligible to be teacher educators, even though these teachers will meet the same standards as a teacher who went through a teacher prep program. This change will also impact eligibility for current tier 2 licensed teachers to become teacher educators.

Program Review Panel

We ask that the board reconsider identifying specific organizations to be a part of the program review panel on lines 31.19-32.1, and returning to the include, but not limited to language. We've had conversations with alternative preparation providers around their experiences with program review panels. They frequently expressed frustration and concern that their programs are being evaluated through a biased lens of a higher education institution. Further, it excludes other potential organizations from joining and adding meaningful value, insight, and support to the program review panel through their various experiences and expertise outside the organizations listed. By listing out independent representatives with the 'includes, but not limited to' language, it would avoid the presumed exclusion of anyone outside of the two named groups from applying or being on the panel.

I appreciate PELSB's time and efforts toward finalizing these rules. Thank you for your time and consideration.

Danyika Leonard, MPA, LSW
Policy Director - Education Evolving

Martha Moriarty · Citizen · (Postal Code: unknown) · Sep 18, 2020 3:27 pm

 0 Votes

Honorable Administrative Law Judge Eric L. Lipman and Members of the Professional Educator Licensing and Standards Board (PELSB)

RE: OAH Docket No. 8-9021-35856 for R4576

September 18, 2020

Judge Lipman and Members of the Professional Educator Licensing and Standards Board,

LDA Minnesota is one of the first alternative teacher preparation programs in Minnesota. We were approved as an alternative unit and program in June 2019. As an alternative program preparing special education teachers in Minnesota we are commenting on the changes to the rule 4576, governing teacher preparation. Specifically, teacher educator requirements, the program review panel and the timeline for approval.

We are concerned about the changes to the teacher educator and methods instructor requirements (Standards 23 and 24) that PELSB made at the special board meeting on Friday, August 28. These new requirements are in direct conflict with Minnesota Statute 122A.2451 Sub. 6(b), which states that the Board must use nontraditional criteria to determine qualification of program instructors, including permitting instructors to hold a baccalaureate degree only." The added requirements are an overreach, do not align with the statute, and could also prevent potential educators of color from becoming teacher educators.

Additionally, many educators have taken various pathways to becoming teachers, have extremely useful and direct experience teaching, and are highly suitable to be teacher educators, particularly methods instructors. This includes those who have received

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degrees abroad. Teacher educator diversity is as crucial as teacher diversity and excluding those with degrees from abroad seems counterproductive in our work towards diversity and equity in education. As well, nearly 400 teachers in Minnesota have gone through the licensure via portfolio process and met all of the same standards as someone who has gone through a teacher prep program, would be ineligible to be teacher educators, as well as all of the current educators who are teaching on a Tier 2 license and, through showing that they are effective and high-quality educators, can move through the tiered system.

LDA Minnesota is concerned about naming specific organizations to be part of the program review panel on lines 31.19-32.1. While we appreciate the inclusion of approved alternative preparation providers, listing specific organizations that do not represent all preparation providers limits who can participate on the panel, may lead to excluding high-quality and diverse individuals who have relevant knowledge that could be beneficial to the panel. For example the MN Association of Colleges for Teacher Education does not represent all preparation programs including LDA Minnesota's, but only those operated by institutions of higher education. We recommend no specific organizations be listed and the panel be composed of independent representatives from relevant areas like teacher preparation providers, educators, policy experts, and more. Importantly, by listing independent representatives, this wouldn't preclude anyone from the two special interest groups from applying or being on the panel.

Lastly, the timeline for initial and continuing approval as laid out in lines 19.29-25.10 is concerning. All new alternative teacher preparation programs have to go through initial approval and in the current draft this would be at least 15 months, which could dissuade high-quality alternative teacher preparation programs from being created. As a small nonprofit organization, the process to prepare our materials and submit them for approval took us 10 months with five staff and consultants working on the project. Though we could have taken longer, the investment of our resources was a limitation. The staff time and material investment to prepare unit and program application materials is an expense for nonprofits and school districts and would increase over time, the longer the process takes. For LDA Minnesota, we had limited funding for the research and development of our applications and materials, if our process went on much longer than the time period taken, we would not have been able to afford becoming a provider.

Thank you for considering LDA Minnesota's concerns.
Martha Moriarty
Executive Director
LDA Minnesota

Troy Haugen · Citizen · (Postal Code: unknown) · Sep 20, 2020 9:54 am

 0 Votes

Honorable Judge Lipman,

My name is Troy Haugen, I am the Director of Career and College Readiness at Lakes Country Service Cooperative and currently serve as the unit leader for our teacher preparation programs. LCSC was the first alternative teacher preparation unit approved in Minnesota and has five approved programs in the areas of career and technical education. I share with you a few concerns regarding Revisor's ID Number 4576 (OAH

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Docket 8-9021-35856).

Late on Friday, August 28th, PELSB made what board staff has characterized as technical changes to teacher educator requirements on the most recent version of the rule draft. These changes, particularly late on the day two business days prior to the public hearing without public input does not seem to be in the spirit of the best public interest, and arguably is not reasonable. Beyond that, the rule has detrimental impacts on the programs for which LCSC operates within career and technical education. Very specifically, in the areas of career and technical education, the area for which LCSC has approved programs, there are an incredibly limited number of approved programs in Minnesota, and in one area, there are actually zero approved preparation programs in Minnesota. By requiring completion of state-approved teacher preparation program for teacher educators in the career and technical educator programs, the board is, in essence, precluding potential programs from ever starting. Additionally, the changes to these requirements are seemingly inconsistent with current Minnesota Statute section 122A.2451, Subd. 6 (b) which states “the board must use nontraditional criteria to determine qualifications of program instructors, including permitting instructors to hold a baccalaureate degree only.”

I recommend going back to the language in draft #4 around the program review panel membership, which allowed for individuals from organizations and individuals from teacher prep providers, licensed teachers and school districts. I previously endorsed this language because it would help to ensure that the program review panel process was fair and unbiased, and also created more opportunities for individuals who are in the field, rather than specific special interest organizations, to be on the program review panel. Simply put, by identifying specific special interest organizations as representatives of general groups the board is intentionally excluding voices simply because of access to membership in those organizations.

Finally, the timeline for initial and continuing approval as laid out in lines 19.29-25.10 is too long. While it may take some units and programs that long to design and implement programs, to expect all programs to take that length of time dissuades potential alternative teacher preparation programs from entering the space. Oftentimes alternative teacher preparation providers need to secure outside funding sources to start programs, and those funding sources have specific timeline restrictions that an overly extended, bureaucratic timeline will undermine.

Thank you for your consideration.
Troy Haugen

Rhonda Bonnstetter · Citizen · (Postal Code: unknown) · Sep 20, 2020 4:55 pm

 0 Votes

Judge Lipman and Members of the Professional Educator Licensing and Standards Board - attached please find comments from the Minnesota Association of Colleges of Teacher Education (MACTE). These comments include additions beyond our testimony at the Sept. 1, 2020 hearing, due to the time constraints that day.

MACTE is the state chapter of the American Association for Colleges of Teacher Education, or AACTE. Our chapter represents all of the 4-year teacher preparation programs in Minnesota, comprising 30 universities and over 800 teacher preparation

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licensure programs. MACTE would like to take this opportunity to note some interesting facts about our members:

- We produce over 98% of the teacher licensure candidates in Minnesota.
- Our programs are not all traditional licensure programs; our members host “alternative” (non-traditional) preparation programs, non-conventional programs, transfer pathways, Grow Your Own, and residency models.
- Our associate membership includes two-year community college programs that were recently approved by PELSB to offer foundation coursework in teacher preparation as part of the Transfer Pathways initiative.
- As a state chapter, we have made it a priority to work in collaboration with the Coalition to Increase Teachers of Color and American Indian Teachers, the MN Education Equity Partnership, and others to increase the number of teachers of color and American Indian teachers in Minnesota.

Our comments regarding proposed unit rule R4576 are attached here; thank you for your time and consideration for our concerns.

Sincerely,

Dr. Rhonda Bonnstetter, MACTE President and members of the MACTE Executive Committee:

Dr. Sonya Vierstraete

Dr. Kyena Cornelius

Dr. Christopher Johnson

Dr. Elizabeth Fogarty

Dr. Stacy Ernst

Prof. Athena Novack

Dr. Kristin Conrad

Paul Spies · Citizen · (Postal Code: unknown) · Sep 21, 2020 9:46 am

 0 Votes

Dear Honorable Judge Lipman,

I am disillusioned and dejected after seeing that so many teacher educators and others who spent so many hours providing more than 100 pages of detailed written feedback (Exhibit J) on the proposed unit and program rules only to have the “Pre-Hearing Responses to Public Comments” (9/15/20) met with a general tone of defensiveness and dismissiveness in that document. While I want to acknowledge there were several important revisions to Draft 7 the Board made on August 28 responding to feedback that improve the proposed Draft 7 Rules, the Sept. 15 summary response seemed to reflect the Board’s eagerness to be done with the process and protect the bulk of what had been Draft 7 rather than respond to all comments received and make more revisions to get proposed rules as sound and as reasonable as possible.

Furthermore, even though the document is titled “Pre-Hearing Responses to Public Comments,” it is dated September 15 and was made available on the PELSB website without email notification 2 weeks after the September 1 hearing with Judge Lipman, more than a month after the August 10 written comment period ended, and less than 1 week before the closing of the initial post-hearing comment period closing on September 21. I also note that even there hasn’t been a published response to comments made at

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the September 1 hearing.

If I had confidence that any more detailed feedback from me or others would be strongly considered, I would have submitted detailed commentary by today's deadline; however, I don't have such confidence. I urge you Judge Lipman to put a halt to this process and expect the Board to demonstrate more timely and responsive feedback to constructive stakeholder input while also creating a Draft 8 that must gain the support of stakeholders with another full comment period.

Thank you,
Paul Spies, PhD
(aka "Comment 15" in Exhibit J)
paul.spies@metrostate.edu

Lisa Gregoire · Citizen · (Postal Code: unknown) · Sep 21, 2020 12:15 pm

👍 0 Votes

Judge Lipman and Members of the Professional Educator Licensing and Standards Board,

We are a newly approved alternative unit and program that began this journey to assist our region and state in finding solutions to provide high quality teachers to meet the ongoing needs of students, during this time of a teacher shortage crisis, and now a pandemic.

We would agree, as others have stated, that the timeline for initial and continuing approval as laid out in lines 19.29-25.10, is too long of a period. Hadn't it been for grant funding, earmarked specifically by our state legislation for organizations to prepare for Alternative Teacher Preparation approval, we would not have been able to commit the time and resources necessary to pursue this. We are in a crisis now. Telling our stakeholders that it will be 2 to 4 years before teacher candidates can enter the workforce is disheartening.

Sincerely,

Lisa Gregoire
SWWC Alternative Teacher Preparation Program

cedrick frazier · Citizen · (Postal Code: unknown) · Sep 21, 2020 3:04 pm

👍 0 Votes

Judge Lipman and Members of the Professional Educator Licensing and Standards Board--

The below comments are submitted on behalf of educators by Education Minnesota.

PROGRAM REVIEW PANEL (PRP)—Lines 32.12-32.16

Education Minnesota supports the change that broadens the membership of the Program

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Review Panel from current rule, and explicitly adds “other teacher advocacy and teacher preparation programs,” to the committee. It also allows flexibility with any changes to the educator landscape by allowing PELSB to add members from non-traditional sources. Education Minnesota is pleased and believes it is extremely important to preserve the expertise and experience of the MN Association of Colleges for Teacher Education and Education Minnesota, which represents 80,000 educators across the state. The preservation of the presence of Education Minnesota is vitally important. The members of Education Minnesota rely on the staff support provided by Education Minnesota to represent on their behalf. As Educators are unlikely to be able to dedicate time away from their classrooms as would be required for the program review process.

Standards for teacher educators—Lines 16.22-18.4

Education Minnesota supports the changes for field-specific methods instructors. Specifically we agree with the language that requires field-specific methods instructors to have completed a teacher preparation program in addition to holding a teaching license aligned to the scope and content of instruction and three years of experience.

Sincerely,

Cedrick R. Frazier
Staff Attorney, Education Minnesota

Christopher Henderson · Citizen · (Postal Code: unknown) · Sep 21, 2020 3:09 pm
👍 0 Votes

Dear Honorable Judge Lipman and Members of the Professional Educator Licensing and Standards Board,

We are a newly approved alternative unit and program with the hope of providing a pathway to teaching for high-quality, diverse individuals to serve the needs of Minnesota students. Our comments on the proposed unit rule R4576 are attached here.

Thank you for your time and consideration of the comments from stakeholders.

Sincerely,
Chris Henderson, Partner, TNTP

Joshua Crosson · Citizen · (Postal Code: unknown) · Sep 21, 2020 3:51 pm
👍 1 Votes

Honorable Administrative Law Judge Eric Lipman,

EdAllies is a statewide education advocacy nonprofit with a vision to ensure every Minnesota student has access to a rigorous and engaging education. Growing a high-quality, diverse teacher workforce is a lynchpin of our mission.

For over 18 months, we have worked with a coalition of alternative teacher preparation providers, nonprofits, and advocacy organizations to understand barriers and needs, and

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strategies to advance this pillar of our work. We believe clear, fair rules are essential to the success and growth of effective pathways to the classroom, and have closely tracked the rulemaking process, submitting recommendations via the Office of Administrative Hearings for every R4576 rule draft. The goal of our recommendations is to ensure a clear, fair, and student-centered system for preparing future teachers, that also allows for high-quality, diverse educators to have multiple pathways to the profession.

We deeply appreciate and recognize the hard work of PELSB board members and staff to strengthen the draft regulations, and to take the feedback from a variety of stakeholders. With that said, there are four significant areas of concern where the draft rules not only impede effective programs but exceed PELSB's rulemaking authority and run counter to statutory language and intent. We also highlight smaller technical recommendations and share areas of commendation.

R4576 CONCERNS AND RECOMMENDATIONS

1) TEACHER EDUCATOR REQUIREMENTS

On Friday, August 28, during the revision phase but after the public comment period, PELSB adopted a requirement that all teacher instructors complete a state-approved teacher preparation program. This last-minute change, along with others adopted during that meeting, was never discussed at any point during the R4576 subcommittee meetings. The public board meetings also never addressed this proposal, and the public never had an opportunity to review or comment. The process was done without the transparency expected of our rulemaking agencies.

Additionally, new requirements for Standards 23 and 24 conflict with Minnesota Statute 122A.2451, which clearly articulates that the Board must permit a teacher educator of an alternative preparation program to use "nontraditional criteria to determine qualifications of program instructors, including permitting instructors to hold a baccalaureate degree only." Statute provides some examples of what nontraditional means and lists things like previous work experiences, teaching experiences, educator evaluations, industry-recognized certifications, and other essentially equivalent demonstrations. Statute specifically states that alternative teacher preparation programs are permitted to have program instructors who hold a Baccalaureate degree only. We see very little ambiguity in the law and believe that the proposed draft rules exceed what is allowed in statute and represent administrative overreach.

Currently, educators have the ability to obtain a license, be remarkable educators, and train future educators. For example, in Minnesota, a teacher can:

- obtain licensure through the portfolio process;
- be a proven and experienced out-of-state teacher or private school educator; or,
- become an experienced, licensed educator through Minnesota's licensure laws, all without having completed a teacher preparation program.

Nearly 400 people have gone through the licensure via portfolio pathway—including several in licensure shortage areas—and have demonstrated competency on the same standards as individuals who completed teacher prep. Furthermore, over 1000 individuals taught on a Tier 2 license in the 2018-19 school year, many of whom have not completed a teacher preparation program.

2) PROGRAM REVIEW PANEL (PRP) MEMBERSHIP

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The membership requirements for the program review panel (PRP) in lines 31.19-32.1 of the proposed rule also fail to reflect the goals of the PRP, instead defaulting to special interests. This change was also finalized in the revision phase after the public comment period. Enumerating special interest groups—Education Minnesota and the Minnesota Association of Colleges for Teacher Education (MACTE)—is a shortcut that does little to clarify the qualifications of PRP membership, while potentially creating conflicts of interest. The PRP was designed for effective, knowledgeable professionals in teacher preparation to review the qualifications of prospective teacher preparation, regardless of whether they are higher education programs, alternative preparation programs, or nonconventional programs. The panel should be as objective as possible in determining whether the preparation programs meet the requirements to become a Minnesota-approved teacher preparation program.

PELSB's proposed regulation of giving a permanent seat to two organizations that have missions tied to very specific stakeholders leads to potential conflicts of interest. This calls into question the objectivity and fairness of the panel. Education Minnesota and MACTE, as organizations, have published statements and spoken out against alternative teacher preparation programs in the past and advocated against them including in a Star Tribune article written by Education Minnesota's president entitled, "Why Minnesota teachers union opposes Teach for America," which also references a letter Education Minnesota and MACTE sent to Governor Dayton requesting he veto funding for the alternative teacher preparation program. Leadership from these groups have also testified at the Legislature—including at the March 11, 2020 Senate E-12 Finance and Policy Committee—to defund alternative programs calling them "shortcuts to licensure."

Because these organizations represent and defend an already established market of standard, higher education centered teacher preparation programs, and have advocated to undermine alternative or nonconventional teacher preparation programs in Minnesota, it is unreasonable to name these organizations as permanent members of a panel that would determine the fate of new and innovative teacher preparation programs going forward.

Furthermore, these groups only represent certain preparation providers and teachers. MACTE does not represent alternative teacher preparation providers, which are not based in institutions of higher education. Education Minnesota does not represent the thousands of Minnesota charter school teachers who serve about 7% of the state's K-12 public school enrollment, including larger proportions of students of color and English Learners. Therefore, these organizations have an incentive to deny certain teacher preparation programs that would otherwise be market competition or support staffing needs of the charter school sector—biases which have already been reported by Minnesota-approved alternative teacher preparation programs.

Listing specific organizations to serve on the program review panel is also unprecedented. Of the nearly 20 states we've reviewed, not one required their program review panel participants to be aligned with or members of a special interest organization. Instead, other states refer to the qualities of a program review panelists such as their level of experience and mastery of the topic. We recommend PELSB makes changes to align with the practice, not allocating seats to organizations, but creating individual requirements for applying to be a reviewer and laying out preferred qualifications, including:

- Knowledge and experience in the PK-12 and/or higher education setting;
- Track record of working collaboratively with peers with diverse views;
- Desire to cultivate different approaches to educator preparation; and more.

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For additional comments on the proposed rule, please see EdAllies' attached document (EdAllies R4576 ALJ Comments.pdf).

Sincerely,
Joshua Crosson
Executive Director, EdAllies

Mikisha Nation · Citizen · (Postal Code: unknown) · Sep 21, 2020 4:14 pm

👍 0 Votes

Formal Comment Submission Memo
(36362 PELSB Request for Comments)
Teach For American Twin Cities

To: Honorable Administrative Law Judge Eric L. Lipman
Members and Staff of the MN Professional Educator Licensing and Standards Board

From: Mikisha Nation, Executive Director, on behalf of Teach For America Twin Cities

OAH Docket No. 8-9021-35856 for R4576

I, Mikisha Nation, the Executive Director of Teach For America Twin Cities, submit the following comments to be considered by the Honorable Administrative Law Judge Eric L. Lipman concerning the possible amendments to the rules governing standards of effective practice and Tiered Licensure.

Context on Teach For America

Teach For America (TFA) was one of the recipients of the alternative teacher preparation grant and has been operating in Minnesota since 2009. Our mission is to ensure that all students have access to an excellent education. As an AmeriCorps program, our corps members start with a two-year commitment to provide rigorous and excellent instruction as classroom educators. A program alum, corps members continue to have a lifetime commitment to advance education equity and advocate for youth to have opportunities to learn, lead, and thrive in our community.

To date, TFA Twin Cities has trained over 300 teachers. For the past three years, 30% - 45% of our first- and second-year teachers have been teachers of color. Also, during this duration, our 3-year retention rate in education has been over 85%. Additionally, for the past 7 years TFA Twin Cities has hosted an annual recruitment event to attract experienced teachers, administrators, principals, and school and system leaders to Minnesota. To date we have engaged close to 200 teachers and leaders in the event. See below for a summary of the impact this event has had on the talent landscape in the twin cities.

- 25% Average percentage of participants identifying as people of color from all events, and as high as 35% in 2017
- 32% Teachers and leaders who are licensed in a shortage subject area such as Special Education, English as a Second Language, and STEM
- 57% Average number of participants who accept a job offer from the event and move to the Twin Cities within the next 6 months

35856 Professional Educator Licensing and Standards Board (Initial Comment Period)

Closed Sep 21, 2020 · Discussion · 13 Participants · 1 Topics · 13 Answers · 0 Replies · 2 Votes

Through these efforts and our program there are now over 900+ TFA alumni in MN. Close to 70% of our 900 alumni still work in education with the vast majority of working in the K-12 as classroom educators, support staff, and administrators. As an organization that has a long standing and vested interest in the education landscape in MN, we look forward to submitting the recommendations below.

Teacher Educator Requirements

On Friday, August 28th the PELSB board adopted changes to the rules governing teacher educator requirements (see revisions made to lines 16.12). As revised, teacher educators are now required to hold a bachelor's degree, have 5 years of experience as a teacher of record and have completed a state approved teacher preparation program. These new requirements are in direct conflict with Minnesota Statute 122A.2451, which clearly states that the board is required to use nontraditional criteria to determine qualification of program instructions, including "permitting instructors to hold a baccalaureate degree only." The added requirements are clearly overreach and do not align with the statute.

Additionally, these requirements will disallow current, high performing, professionally licensed teachers in the state of MN from pursuing roles as teacher educators. The nearly 400 teachers who have gone through the licensure via portfolio process, meeting all of the same standards as someone who has completed a teacher prep program, and all current educators who are teaching on a Tier 2 license and, through showing that they are effective and high-quality educators, can move through the tiered system, will now be ineligible.

What is most concerning, is that if implemented, this rule change could prevent teachers of color from pursuing teacher educator roles, as they are currently and systematically underrepresented in and underserved by our current state approved teacher preparation programs. There are several alternative pathways and criteria that may be used to identify qualified teacher educators that maintain a high bar and allow for greater access to these roles.

Program Review Panel Membership

I would like to address requirements related to the program review panel membership. We are concerned about naming specific organizations to be part of the program review panel on lines 31.19-32.1. As written, both Education Minnesota and MACTE would have seats designated on the panel for members.

Listing specific organizations will inherently limit who can participate on the panel, which can lead to excluding high-quality and diverse individuals who have relevant knowledge that could be beneficial to the panel. We recommend the panel be composed of independent representatives from relevant areas such as teacher preparation providers, educators, policy experts, and more. Importantly, by listing out independent representatives, this would not preclude anyone from the two special interest groups from applying or being on the panel.

Additionally, in conversations with alternative providers, they have expressed experiencing bias and receiving conflicting information from the current program review panel that is made up predominantly of members familiar with institutions of higher education. Alternative teacher preparation programs are not represented by MACTE and could continue to experience bias.

Furthermore, charter school teachers are not represented by Education Minnesota, so this language excludes the thousands of educators who are doing amazing and innovative work in those schools, and whose experience would be beneficial to being on

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the board.

Finally, despite our results and the fact that several of our corps members and alumni are part of the union, Education Minnesota has spoken out against us for years, including op-eds in the Star Tribune and statements against our program. Listing specific organizations that have political agendas limit who can participate on the panel and potentially skew the representative nature of the panel.

Recruiting Diverse Teacher Candidates

In lines 14.6 and 16.2 we suggest an amendment to the language to clarify the responsibility of the unit for recruiting a diverse pool of teacher candidates. We suggest including language that specifies that recruiting efforts should be made to develop a pool of candidates that is “at least in proportion to” the demographics of a specific K-12 student population (city, district, state). The current language is ambiguous about which K-12 student population the unit would have to base their recruitment numbers on. Furthermore, the current language could be interpreted as a quota, which could adversely affect students or teacher educators of color. For example, under this proposed language a program that has 2% Indigenous teacher candidates—the current statewide percentage of K-12 students—and could stop recruiting or admitting Indigenous teacher candidates.

Cooperating Teacher Requirements

We suggest the following potential language changes to the rules governing cooperating teacher requirements.

- Lines 9.9-9.10: Strike “has completed professional development in coaching strategies for adult learners.”
- Line 9.16-9.17: We recommend clarifying the language about which entity—the unit, the school or the district—will provide the described training.
- Lines 14.1-14.2: Amend the line to read “...completes professional development demonstrates competency in coaching strategies...”

We believe that as written this requirement creates an unnecessary barrier for teachers who may be great cooperating teachers but who may have not completed this specific type of professional development. Additionally, it is important to note that completing professional development alone doesn’t mean that someone is competent in coaching teacher candidates during their student teaching or practicum. We recommend striking the line or amending the language to be more output focused to read “has demonstrated competence in coaching and mentoring.”

Furthermore, as it currently reads, the cooperating teacher must receive training, but it is not specified if the district, school or unit must provide that training. It seems inherent that districts and schools, and unit leaders would like clarity on this regulation so it’s clear about where the responsibility lies.

Equitable Access to Program Information

We suggested amending the language in line 14.12 to read “...must make available to candidates, online or and in print, the...” Information about a unit’s program and completion requirements, financial aid, appeal processes, procedures for responding to complaints, etc. is incredibly important information for a candidate to have as they navigate through their preparation program and work towards licensure. If a unit offers this information in only one of those formats, rather than in both, then candidates may not see it, which creates equity and access issues. We would recommend that the unit must, at the very least, have these things posted online.

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Program Review Procedures

We suggest amending the lines 25.19-25.20 to read “the board staff unit leader shall...”
As written, this rule will provide too much authority to the board staff by giving them the ability to make the final decisions about who is on the review team. If the board staff and the applicant cannot agree on who should be on the review team, then it would be more fair for the unit leader to make the final decision.

We also suggest amending lines 21.16-21.19 to read “The board may must require the unit to submit an interim report during the approval period to demonstrate compliance with the standards identified as “Not Met” in the review team’s written report.” As it reads now, a unit may receive full continuing approval without meeting all of the standards and then do not have to provide evidence during their approval period that they have met the standards. In order to ensure quality, we recommend that PELSB require units to demonstrate during their approval period that they have met any unmet standards.

Conclusion

Thank you for receiving our comment. We are deeply committed to advocating for and working toward a more diverse teaching force in the state of MN and feel strongly that the potential rule changes we referenced may impact our ability to do so. We feel strongly that our suggestions would in no way limit our state’s ability to ensure more truly high-quality, effective, and diverse teachers are in the classroom impacting our students.

Respectfully submitted by,

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TO: Honorable Administrative Law Judge Eric L. Lipman
FR: University of Minnesota System-wide Teacher Education Unit Deans, Chairs and Directors
DT: September 1, 2020
RE: **OAH Docket No.** 8-9021-35856 for R4576

The following is submitted on behalf of the teacher education unit leaders from the four University of Minnesota campuses — Crookston, Duluth, Morris, and Twin Cities. The UMN system offers PELSB-approved undergraduate and graduate programs to prepare new teachers for Minnesota’s highly diverse student population and school contexts. As a UMN system, we have remaining concerns to bring to your attention regarding R4576 as proposed.

However, before beginning the statement about these concerns, we would like to recognize the labor-intensive work that PELSB board members and staff have done during this rulemaking process. We are in agreement with many of the proposed rules for teacher preparation in Minnesota. We have appreciated staff members’ willingness to meet with us about these proposed rules and feel that they have sought to keep teacher education providers apprised of proposed changes and the ways that input can be given.

Despite our agreement with many of the proposed rules, we continue to have serious concerns about four proposed standards. We — and other teacher education units — have given PELSB feedback about these concerns in the past, yet we see that the Board has decided to bring these standards forward with remaining issues. Therefore, we will describe how our teacher education units believe these four standards are unneeded, unreasonable, or have the potential to do harm to the delivery of high-quality, MN standards-based teacher education programming.

- 1.) The first area of concern is Standard 24 in 8705.1010. In current rule, faculty teaching these courses only need to have one year of experience as a teacher of record. Proposed rule suggests that this be changed to three years of teaching experience. This change is unneeded. First, in the SONAR, PELSB states that they would like to change the rule because since they adopted the requirement that a methods instructor have one year of classroom experience in 2014, “the intent of this requirement has been worked around and many methods instructors have not had real experience in a classroom.” In our units,

all methods instructors have had at least one year of K-12 teaching experience aligned to the course they teach. We are unaware of the ways that units have reportedly “worked around” the existing requirement. We would like to suggest that if the problem is, as stated in the SONAR, that units are not following existing faculty qualification rules, the answer should be to change oversight practices rather than rules. Further, we would like to note that in the SONAR, PELSB does not cite any research as evidence for their assertion that increased time as a K-12 teacher of record improves the ability of teacher education faculty to effectively teach these courses.

Not only is this change unneeded, but it also has the potential to do harm. First, there are experienced teacher educators in our unit and across the state¹ who currently teach methods courses but have not had 3 years of K-12 teaching experience. While these faculty members may not have had three years of experience as K-12 teachers of record, they have had many other important experiences as part of their doctoral programs to prepare them as teacher educators. This includes years spent in schools consulting and working with teacher candidates and K-12 students. These teacher educators are also researchers who study how children and youth learn in specific content areas and how best to prepare teachers to work with K-12 students. Also, we have found that depth of content (for example, the deep knowledge of mathematics learning principles for children and youth) is non-negotiable for teacher educators teaching methods coursework, and teacher educators with doctoral degrees have robust preparation in their methods content area. So, changing this rule has the potential to do significant harm to teacher candidates and the K12 students they serve as new teachers will no longer have content experts teaching methods courses.

Second, the proposed qualification changes will harm our ability to hire teacher educators of color who are critical to our work to prepare future teachers for our increasingly diverse K-12 schools. When we look at our hiring pools, scholars of color who are applying for teacher educator positions have often taught in K-12 schools for only one or two years. We are frequently told by these candidates that they choose to pursue a doctoral degree and become teacher educators because they believed they would be better able to impact change in such a role. PELSB has articulated a goal to increase the number of teachers of color in the state, and we know that increasing teacher educators of color has a direct impact on reaching this goal. PELSB has also, in Standard 22 of these proposed rules, required that teacher education units have strategies for recruiting and retaining teacher educators of diverse backgrounds, including racially and ethnically

¹ The Minnesota Association of Colleges for Teacher Education surveyed its members and found that approximately 24% of the faculty currently teaching methods courses will no longer be qualified if this rule change is adopted.

diverse teacher educators. We believe that the proposed increase from one to three years of teaching experience in faculty qualifications in Standard 24 would hinder our ability to meet Standard 22 and disrupt the progress we have made to diversify our teacher education faculty these past five years.

For all of these reasons, we remain concerned that raising the required number of years of K-12 teaching experience for methods instructors from one to three years is not needed, and, in fact, does harm in that teacher education programs will lose deep content expertise, MN will attract fewer faculty of color, and future candidates of color will be interested in applying to become new K-12 teachers.

However, if the court agrees with PELSB that the increased requirement is needed, we — and almost every other teacher education unit — have communicated clearly that including a “grand(parent) clause” in the new rule is necessary. This would allow currently qualified faculty members to continue to teach methods courses in preparation programs. Future faculty would be hired under the new rule.

PELSB has not yet included this critical accommodation. Instead, they have extended the amount of time before this part of rule goes into effect to three years. In the SONAR, they write that this would give faculty time to attain more K-12 teaching experience. However, we do not believe that it is reasonable or fiscally possible for institutions of higher education to require currently qualified methods faculty to leave their full-time positions as professors/instructors at a college or university to return to K-12 schools to teach for two years. In addition, universities do not have funds to provide wide-scale paid leaves of absence or sabbaticals to accommodate this requirement. Finally, if faculty are required to leave their institutions to address new rule requirements, this would have a significant impact on higher education. We would lose many experienced methods faculty in the next few years, which will create even more significant methods faculty shortages in the high needs areas of math, science, reading, dance, theater, literacy, ESL and world languages. This would also have a long term impact on the ability of some of these faculty members to achieve tenure and promotion, maintain employment, or advance in their careers.

Ultimately, the higher education provider carries double the financial burden as many current tenure/tenure track faculty members would need, under the new proposed rule, to be reassigned (if contractually possible) to teach in other areas, and someone new must be recruited and hired in their place as well. Approval to recruit and hire tenure/tenure track faculty for these critical positions in higher education takes a minimum of 1 year, but often 2 years or more. Currently the U of MN is in a hiring freeze due to COVID-19

which continues to impact our society, state funding, and programming in higher education. Thus, without a “grand(parent) clause” PELSB is placing institutions of higher education-- who hired teacher educators in good faith under state rules that were current at the time of their hire--at great risk of not being able to deliver their programs.

- 2.) Our second area of concern is also related to proposed Standard 24 for faculty qualifications for teacher educators who teach methods courses. PELSB is proposing that all methods instructors must have completed a “state approved teacher licensure program.” We understand from Board discussions that this proposed requirement helps alleviate concerns that a teacher who has not completed academic coursework focused on education or on the pedagogical knowledge base of their content area would teach a methods course. This could happen if someone utilized the available pathway through the new tiered licensure process to achieve a Tier 3 professional license without ever taking education focused course work. We share this concern and support this addition insofar as it prevents people in this situation from teaching methods courses. We support this requirement for any teacher educator who has only earned a bachelor’s degree and would be qualified to teach methods courses under Standard 23 subitem (2).

However, requiring that all teacher educators have completed a state-approved teacher preparation program will negatively impact a number of our teacher educators who are well prepared to teach methods courses. We have, for example, a number of teacher educators who received their training abroad. Thus, they did not go through a state-approved program. We also have teacher educators who taught for many years in a private school which did not require a license or taught in another state/country which did not require licensure. These instructors then earned a doctorate in education after their teaching experience(s) and have been teaching in teacher licensure programs. In their doctoral programs, they have completed more and more robust coursework than they would have taken in an initial licensure program. We assert it would be unreasonable to ask them, or any practicing teacher educator, to enroll as a student in an initial licensure program (They are currently teaching in such a program and are qualified by the Higher Learning Commission to teach in such programs). As written, this rule does not allow a reasonable pathway for practicing teacher educators with advanced degrees in education related fields who did not complete a state-approved program to become qualified methods instructors.

If the intent of this rule is to assure that underprepared teacher educators do not become methods instructors, we support that purpose. However, PELSB must include additional options that would allow methods instructors to meet the standard in a different way. This might mean differentiating between teacher educators qualified in Standard 23,

under subitem (1) and subitem (2). Teacher educators qualified under subitem (1) already must have a minimum of 18 graduate credits related to the licensure area. This is already a significant additional qualification that most teachers who moved through the tiered licensure process to Tier 3 won't have.

- 3.) Another area of concern for us is Standard 8, which is one of the proposed standards that establishes designated partnerships between teacher preparation providers and schools. We work with school partners already but what we are concerned about is the *prescriptive nature of the items that must be discussed* when we meet with our school partners. In Standard 8, PELSB proposes that units meet with their designated partners twice a year and, during these meetings, we are to review the data included in Standard 3. Standard 3 requires six different kinds of data be collected. This includes three kinds of survey data and many sets of data from standardized performance assessments and licensure examinations - and these standardized assessments are different for all the various licensure areas.

We believe that being so prescriptive in the list of data that must be reviewed during these two meetings with our partner schools is not a reasonable request. We would not have time in these important sessions to discuss other critical issues about how to best prepare teacher candidates. Teacher preparation units and designated partner schools need to have the flexibility to set the agendas for their meetings so they can focus on the issues that most impact the partnerships. This would most certainly include discussing data to enable program improvement. But there is other critical work required to enable strong program improvement. To support our request that this proposed standard be changed, we refer to state regulatory policy 14.002, which states that “some regulatory rules and programs have become overly prescriptive and inflexible” and directs agencies to develop rules that provide “maximum flexibility for the regulated party.” We do not believe that the prescriptive nature of Standard 8 meets this requirement.

In addition, we would like to state that Standard 4 of these proposed rules already requires teacher preparation units to systematically review the same data required in Standard 8 with stakeholders, which must include school partners. We have-- and will continue to have-- advisory boards with whom we review data and discuss possible changes to our programs that the data indicate might be needed. These advisory boards include school partners and representatives from the designated partner school, making the prescriptive list of items to discuss in meetings with designated partner schools redundant and therefore not needed.

4.). Our final area of concern has more to do with the lack of detail in Chapter 8705.1500 rather than a disagreement with the nature of the chapter itself. The proposed new requirement states that units will write a “Unit Report on Continuous Improvement.” This report replaces a series of much more prescriptive reports that we were writing for every single program for our continuing approval process. We are grateful to PELSB staff and the Board for making changes that will make such reports more manageable and more valuable for all.

We remain concerned with the lack of detail about this new report in the proposed chapter that addresses it. First, we do not believe it is clear in the proposed rules when or how often this new report is to be completed. We believe the intention is that this new report is to be completed every three years to align with program continuing approval reporting. However, because the report was originally titled “midcycle” report, it has also been interpreted to be required every six years, midway between full unit reports. We feel the timing should be clarified in rule.

We are also concerned with the lack of details about the review process for the Continuous Improvement report and about possible board action based on the contents of these reports. We provide our evidence and recommendations in our written statement, as well as in our feedback submitted on August 9, 2020 to PELSB.

First, there is no peer review included in the described process of reviewing this new report. All other major reports in the proposed rule are either reviewed by the Program Review Panel or a unit review team, both of which include teacher educators from approved providers (excluding educators from the institution under review).

While the Board always makes final determinations about teacher providers, only one member of the Board has direct experience in teacher preparation. Therefore, the input from peer teacher educators--such as those on the Program Review Panels--is critical as these professionals have knowledge of teacher preparation contexts. Careful review from peers is a needed step to assure that all relevant factors have been examined and considered. In the proposed rules before us today, these new reports go directly from Board staff to the Board, without an opportunity for peer review. We believe that the peer review component that is present in all other required reports is also needed for this report.

Another concern we have about the Unit Report on Continuous Improvement report and review process is what happens with the findings. That is, what is missing in the Chapter is a description of the actions that the board may/must take in response to the reports

submitted by institutions. There is a description of situations in which the report must be referred to the Board, but there is nothing in the proposed rules about what will happen after a report is referred to the board. We believe that this is an oversight that may cause confusion or inconsistencies in the way these reports are used and evaluated.

Thank you for the opportunity to share these concerns with you today. We hope that by working together and listening to the voices of all stakeholders we can arrive at a set of clear, effective rules for teacher preparation programs that will effectively serve future teachers and children in the state of Minnesota for many years to come.

Sincerely,

Deborah Dillon, Ph.D. Senior Associate Dean of Graduate and Professional Programs
College of Education and Human Development (CEHD)
University of Minnesota Twin Cities

Stacy Ernst, Ph.D. Director of the Office of Teacher Education (OTE) in CEHD
University of Minnesota Twin Cities

Cari Maguire, Ph.D. Coordinator of Continuous Improvement (OTE) in CEHD
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Shari Daniels, Ph.D. Assistant Professor, Teacher Education
University of Minnesota Crookston

Soo-Yin Lim-Thompson, Ph.D. Professor, Teacher Education & Education Program Director
University of Minnesota Crookston

Kristen McMaster, Ph.D. Chair, Department of Education Psychology in CEHD
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Michelle L. Page, Ph.D. Chair, Division of Education
University of Minnesota Morris

Jill A. Pinkney Pastrana, Ph.D. Dean, College of Education and Human Service Professions
University of Minnesota Duluth

Mark Vagle, Ph.D. Chair, Department of Curriculum and Instruction in CEHD
University of Minnesota Twin Cities

Honorable Administrative Law Judge Eric L. Lipman
Members of the Professional Educator Licensing & Standards Board (PELSB)
RE: OAH Docket No. 8-9021-35856 for R4576

RECEIVED

By: OAH on 9/18/2020 @ 10:08 am

Danyika Leonard

September 18, 2020

Judge Lipman and Members of the Board,

My name is Danyika Leonard and I am the Policy Director for Education Evolving. Education Evolving is a non-partisan education organization that works to advance student-centered learning for all students, by supporting teachers who are designing and leading schools, and by advocating for policy that allows for thoughtful innovation in schools across the state. I am commenting on proposed changes to the rule 4576, governing teacher preparation. Specifically, teacher educator requirements and the program review panel.

Teacher Educator Requirements

On Friday August 28th, there was a special PELSB board meeting where changes were made to the teacher educator and methods instructor requirements. The changes to these requirements are incongruent with the current Minnesota Statute 122A.2451, which directs the board to use states nontraditional criteria to determine qualification of program instructions, including permitting instructors to hold a “baccalaureate degree only.” This change could unintentionally impede potential teachers of color and American Indian teachers from becoming teacher educators. It is especially troubling for teachers who have obtained their licensure through the portfolio process. This rule change will make them ineligible to be teacher educators, even though these teachers will meet the same standards as a teacher who went through a teacher prep program. This change will also impact eligibility for current tier 2 licensed teachers to become teacher educators.

Program Review Panel

We ask that the board reconsider identifying specific organizations to be a part of the program review panel on lines 31.19-32.1, and returning to the include, but not limited to language. We’ve had conversations with alternative preparation providers around their experiences with program review panels. They frequently expressed frustration and concern that their programs are being evaluated through a biased lens of a higher education institution. Further, it excludes other potential organizations from joining and adding meaningful value, insight, and support to the program review panel through their various experiences and expertise outside the organizations listed. By listing out independent representatives with the 'includes, but not limited to' language, it would avoid the presumed exclusion of anyone outside of the two named groups from applying or being on the panel.

I appreciate PELSB’s time and efforts toward finalizing these rules. Thank you for your time and consideration.

Danyika Leonard, MPA, LSW

Policy Director - Education Evolving
332 Minnesota Street Suite W1360
St Paul, MN 55101

RECEIVED

Rhonda Bonnstetter

By: OAH on 9/20/2020 @ 4:55 pm

Judge Lipman and Members of the Professional Educator Licensing and Standards Board:

My name is Dr. Rhonda Bonnstetter. I am a faculty member at Southwest Minnesota State University, and I am commenting today as president of the Minnesota Association for Colleges of Teacher Education, or MACTE. MACTE's membership includes ALL of the approved colleges of teacher education in Minnesota, including those under the University of Minnesota, the Minnesota State University System, and all private college/university teacher preparation providers.

MACTE supports most of the changes in Unit Rule R4576. We note a few key areas that remain concerning to our members.

Our first area of concern is in the area of faculty qualifications in Subpt. 5C, Standard 24, beginning on line 16.22 of Draft 7. The proposed rule change would move from a requirement of 'at least 1 academic year of PreK through grade 12 teaching experience in the content area and scope' to requiring 'has three years of experience as a teacher of record, including at least one year aligned to the scope and content area of instruction'.

At PELSBS's request, MACTE conducted a survey of the Deans of its membership on the impact that the changes in faculty qualifications as currently proposed in unit rule (R4576) for methods courses would have on their institutions. With 23 of our 31 members responding (roughly 2/3), a total of 147 faculty out of 621, or 24% of current faculty members would be adversely impacted by the change in faculty qualifications moving from one year of experience to three years of experience as teacher of record in the scope and licensure area.

Our teacher education programs have hired tenure-track faculty members over the past several years using the requirements of a masters degree or higher and one year of teaching experience. The move to requiring at least three years of teaching experience as teacher of record puts many of our faculty members out of compliance; PELSBS staff has noted in the SONAR that the teacher preparation providers hiring those individuals should apply for a yearly waiver instead. Given that approximately 200 faculty members may be impacted, this will put an extra burden on the PELSBS staff to process and track the individual faculty waiver requests coming from each preparation program. It is neither 'reasonable' or feasible to expect full time faculty members to go back to the PreK-12 classroom to take on the role of teacher of record to gain one to two years of teaching experience while also maintaining their faculty role. This puts those faculty members at risk of losing their positions or being able to move forward for tenure/promotion. It puts deans in a position of having to determine how to reassign faculty members who were expressly hired to teach methods coursework in their licensure programs. This has important budgetary impacts on our already financially strained programs. This also impacts our programs' ability to hire diverse candidates who may have had a different path to teacher education than the traditionally prepared candidates. As an example, many of our programs have hired faculty who have worked extensively in classroom settings co-teaching in our partner districts - but were not listed as the teacher of record. When unit rule does not recognize the expertise of these faculty members, it hampers our ability to provide evidence of meeting Standard 22, "recruiting and retaining teacher educators with diverse backgrounds and experiences, including racially and ethnically diverse teacher educators". It also counterintuitive to PELSBS's goal 3 to "increase the racial and ethnic diversity of the educator workforce throughout all regions of Minnesota".

MACTE's second area of concern is in regard to Subpt. 2, standards 6-8, beginning with line 7.12 of Draft 7. We have expressed concerns about the proposed definitions and implementation of community partnerships. We see possible burdens for both metro and non-metro teacher preparation providers. For metro providers, there are sometimes many teacher preparation programs concentrated in a small area, and one district may be asked to serve as the partner for several preparation programs. In non-metro regions, one person may wear multiple hats as the district's superintendent, principal, curriculum coordinator, testing coordinator, etc.; asking that person to take on additional responsibilities in working with area teacher preparation programs. We see this is an additional burden for the PK-12 schools themselves, who should not be bearing the burden of teacher preparation rules mandated by a body outside of their own governance structure. These burdens include, but are not limited to, significant additional costs in time and procedures to complete training, certification of compliance, etc. Other rule requirements already require providers to have a Teacher Education Advisory Committee that meets at least once per year to gain stakeholder feedback; stakeholders can certainly request more frequent meetings if both sides feel it will be beneficial. Adding additional requirements in rule is neither necessary nor reasonable.

MACTE) is in support of the language presented by PELSB at the administrative rules hearing in line 31.2. This language addresses the membership of the Program Review Panel (PRP). We are also writing to respond to a number of comments that were made by stakeholders at the rules hearing and submitted to the administrative law judge concerning this proposed language.

Proposed rule includes the requirement that representatives of the Minnesota Association of Colleges for Teacher Education (MACTE) are included on the Program Review Panel (PRP):

Line 31.21 - Exhibit K-5

PRP membership must include but is not limited to representation from the Professional Educator Licensing and Standards Board, Minnesota Association of Colleges for Teacher Education, Education Minnesota, and varying types of teacher preparation and teacher advocacy organization.

We are strongly in support of this proposal and believe that including language in rule that specifies that the PRP include members from MACTE is vital to the successful functioning of the program review panel. The panel was created at a time when alternative teacher preparation programs in Minnesota were only allowed if created with a higher education partner. Since then, the laws have changed but the focus of the PRP still remains on ensuring that all teacher preparation providers meet the same Minnesota standards. The PRP is meant to add a level of expert peer review to the standards review process which is critical to approving and evaluating teacher licensure programs in the state. Expert members of this panel, currently including representatives from alternative, conventional and non-conventional programs across the state, spend a great deal of time looking closely at proposed programs. The work of the program review panel can simply not be done unless most of members on the panel have deep knowledge of teacher education, the standards which regulate teacher education, and experience doing the difficult work of aligning standards to curriculum, whether that curriculum be traditional credit-bearing curriculum in an institution of higher education or curriculum in an alternative setting. Finally, it is critical to note that the PELSB board has ultimate decision-making authority regarding whether a proposed program will be approved or not, and the feedback from the PRP and the Teacher Prep Subcommittee is used to inform that decision.

MACTE is the professional organization whose membership includes the overwhelming majority of all the teacher educators in the state - the professionals whose membership on this panel are necessary in order for it to function. There are currently 32 approved teacher preparation units that are affiliated with colleges and universities in the state of Minnesota. These 32 units have over 800 approved licensure programs between them. In comparison, there are currently only three approved teacher education units not associated with an institution of higher education and, therefore, not represented by MACTE. These three units combined currently have only five PELSB board approved programs. It is also important to note that so far, no teachers have completed and been licensed through these alternative preparation units. This means that of the teachers recommended for an initial teaching license from a teacher education unit in the state of Minnesota last year, all of them completed their licensure programs at an institution affiliated with MACTE.

By discussing the low number of programs that are currently approved at alternative preparation providers, we in no way seek to disparage these providers or their programs. We are fully in support of efforts that seek to diversify the teaching pool in the state, provide alternative pathways to licensure, or seek to license teachers in shortage areas. Many of MACTE's members are also engaged in creating alternative and innovative programs that seek to meet these goals. We mention the uneven number of providers represented by MACTE versus those not affiliated with this organization simply to show that if peer review is to be the goal of the PRP, it must include membership from MACTE, as this is where the qualified "peers" are to be found.

Peer review is an important process in which professionals with similar areas of expertise hold each other accountable for meeting the high standards of the field. Minnesota sets high standards for teacher education in our state and the peer review process done in the PRP assures that these high standards are met regardless of whether the proposed program is attached to a college or university or not.

During the September 1st rules hearing, many stakeholders spoke against including a requirement that some of the members of the PRP are from MACTE. Below, please find a summary of the claims that were made by stakeholders at the hearing and our concerns about these claims:

Claim 1 - MACTE is biased against alternative preparation providers:

A number of speakers at the rules hearing gave the impression that institutions of higher education (and therefore MACTE members) are somehow against alternative preparation providers, and, due to this, MACTE members would be biased when reviewing programs brought by current and future alternative prep providers. Citing one or two articles that were published pointing out faults in a particular alternative preparation provider does not indicate that all colleges or universities are against all alternative preparation providers. In fact, as stated above, many teacher education units affiliated with colleges or universities have themselves developed programs that are innovative and alternative/non-conventional in nature. We all believe that meeting the teacher shortage in the state, especially in high need areas is critical. We all believe that increasing the number of teachers of color in the state is critical. However, we do not believe that alternative preparation providers should be held to a different or lower standard when it comes to meeting the requirements set forth by PELSB.

In the past, some alternative providers have not had their program recommended by the PRP, especially not on the first review. It is important to note that almost all teacher education units who belong to MACTE have had similar experiences when trying to get programs approved through the program

review panel. It is not an easy or automatic process. There is a high level of quality expected of teacher education programs in Minnesota. This is expected of programs that are housed in institutions of higher education, and it is expected of programs that are housed in alternative preparation units.

The experiences that alternative preparation providers have had with the PRP demonstrate the peer review system is working and the state's high standards for teacher education are applied to both traditional and alternative preparation providers. It is also important to remember that while MACTE is one professional organization, the 33 affiliates are all also competitors with each other.

Claim 2 - Listing representation from MACTE as required for the PRP would keep others from participating in the PRP.

The language in proposed rule stipulates that some of the membership be from MACTE but this certainly does not preclude any other people from serving on the PRP. Proposed rule states "including but not limited to."

Multiple witnesses at the hearing made the argument that including representatives from MACTE and Education Minnesota as permanent members of the program review panel would somehow preclude others from serving on this panel. But the language in proposed rule, as well as the language in current rule, clearly states that membership includes but is not limited to these two organizations. Furthermore, language requires that "varying types of teacher preparation and teacher advocacy organization" are also included in the program review panel. Proposed rule clearly stipulates that the PRP include representatives from other organizations in addition to MACTE.

Claim 3: This change was made too late in the process, thus not allowing organizations time to respond:

This claim is not accurate. The language discussed in the rules hearing was the same language that was in the version of rule released in February.

Version 7, approved February 14, 2020

The Professional Educator Licensing and Standards Board must establish a program 31.20 review panel (PRP) as a standing committee of the board to assist with program review and 31.21 approval processes. PRP membership shall must include but is not limited to representation 31.22 from organizations including, but not limited to, the Professional Educator Licensing and 31.23 Standards Board, Minnesota Association of Colleges for Teacher Education, the Minnesota 31.24 Department of Education approved alternative preparation providers, and Education Minnesota

The proposal to remove MACTE from the language was first made in a PELSB subcommittee meeting on August 13th and discussed by the full board as a possible update to the rule draft on August 21st. On August 28, the language stipulating that some members of the PRP be from MACTE was returned to the rule draft. As members of MACTE we, in fact, were preparing to testify at the rules hearing that removing MACTE from the PRP language was a major last minute change.

Claim 4: It is unprecedented and possibly unlawful to have an organization specifically named in rule.

To this argument, we would like to respond that the proposed version of rule addressing PRP membership looks very much like what is written in current rule, as follows:

Current Rule:

8705.2000 PROGRAM REVIEW PANEL (PRP).

The Professional Educator Licensing and Standards Board shall establish a program review panel (PRP) as a standing committee of the board to assist with program review and approval processes. PRP membership shall include 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, and Education Minnesota.

In conclusion, we believe that representation from the Minnesota Association of Colleges for Teacher Education is vital to the successful functioning of the program review panel. MACTE's membership includes the overwhelming majority of teacher educators and approved programs in the state. Allowing MACTE to choose their representatives assures that a balanced number of teacher educators from MACTE's internal caucuses, which represent different kinds of teacher education units, serve on the program review panel.

Minnesota Association for Colleges of Teacher Education Executive Committee:

Dr. Rhonda Bonnstetter, President

Dr. Sonya Vierstraete

Dr. Kyena Cornelius

Dr. Christopher Johnson

Dr. Elizabeth Fogarty

Dr. Stacy Ernst

Prof. Athena Novack

Dr. Kristin Conrad

Christopher Henderson

TNTP ALJ R4576 Written Comment

September 21, 2020

TNTP respectfully submits the following written comment regarding proposed rule changes under consideration by ALJ R4576. The goal of our comments is to ensure rigorous, fair, transparent standards for teacher preparation, regardless of pathway or licensing organization, to ensure high-quality, diverse teachers to all Minnesota students, especially those who need them the most.

TNTP is a national education nonprofit, offering school systems a range of support in the areas of talent, academics, community engagement, and policy. Since 2000, TNTP has recruited and trained 37,000 talented, diverse teachers for students who need them most. TNTP currently runs educator pathway sites across the country and filled almost 1,000 vacancies across its teacher training programs for school year 2019-20. TNTP is currently undergoing the teacher preparation program approval process.

Educator Licensure Requirements

Regarding changes made to the teacher educator and methods instructor requirements at the special PELSB board meeting Friday, August 28, we are of the opinion that these new requirements are in direct conflict with Minnesota Statute 122A.2451, and could prevent quality, diverse teacher educators. We are also of the opinion that these new requirements will invalidate currently licensed teachers who have previously met the state standard for licensure – namely the nearly 400 teachers licensed via portfolio process, as well as current educators holding a Tier 2 license who can move through the tiered system by demonstrating they are effective and high-quality educators.

Standards for Clinical Experiences

We recommend striking “has completed professional development in coaching strategies for adult learners,” from lines 9.9-9.10, and amending the language to be output focused, such as “has demonstrated competence in coaching and mentoring.” We believe the requirement as currently written would create an unnecessary barrier for teachers who may be great cooperating teachers but who haven’t completed, or been given the opportunity to complete, this specific type of professional development. Furthermore, the fact that an individual has completed training, does not necessarily equate to effectiveness in the training area, in this case coaching strategies for adult learners. We recommend a similar change for lines 14.1-14.2 to “...~~completes professional development~~ demonstrates competency in coaching strategies...” Simply completing professional development doesn’t mean someone is competent in being able to coach adults. We recommend more active language that would ensure someone is effective, while also not placing an unnecessary barrier to becoming a supervisor.

We recommend clarifying the language about which entity—the unit, the school, or the district—is responsible for providing the training described in lines 9.16-9.17. As it currently reads, it is not clear which entity must ensure training is provided, leaving ambiguity for respective units, schools, and districts on where responsibility lies.

Initial Approval Process

We are concerned about the timeline for initial and continuing approval as laid out in lines 19.29-25.10. All new alternative teacher preparation programs would have to go through initial approval which is currently at least a 15-month process. As a result, high-quality alternative teacher preparation programs could be dissuaded or fiscally prohibited from pursuing and securing initial program approval. This potentially limits the number of local nonprofits or school districts, as well as potential national organizations, who may or can pursue launching a high-quality alternative teacher preparation program, leaving thousands of Minnesota students who need them the most without a high-quality teacher. As an organization currently navigating initial program approval and diligently working to meet the high standards set by the state of Minnesota, we have firsthand knowledge of the challenges that the current multi-year process can entail.

Board Determination for Initial Approval

We recommend lines 21.16-21.19 be amended to read “The board ~~may~~ must require the unit to submit an interim report during the approval period to demonstrate compliance with the standards identified as “Not Met” in the review team’s written report.” As currently written, a unit may receive approval without meeting all of the standards and subsequently not have to provide evidence during the approval period that all standards have been met. In order to ensure quality, we recommend units are required to demonstrate they have met any unmet standards during their approval period.

Unit Review Teams and Expenses

We recommend that lines 25.19-25.20 be amended to read “the ~~board staff~~ unit leader shall...” We believe that in the event the board staff and the applicant cannot agree on who should be on the review team, then it would be fairer for the unit leader to make the final decision.

Program Review Panel

Regarding the proposed program review panel changes, we are concerned specific organizations are named as part of the program review panel on lines 31.19-32.1. Alternative teacher preparation programs, like those proposed by TNTP, are not represented by MACTE and we are concerned that, as a result, panelists could lack important context on the mechanics, rigor, and quality of alternative teacher preparation programs, or be biased by representing interests in direct conflict with the approval of additional, alternative educator pathways. In addition, by listing specific organizations, the voice of high-quality, diverse educators with relevant experience and knowledge outside of the currently listed organizations is limited. We recommend the panel be composed of independent representatives from groups such as teacher preparation providers, educators, and policy experts. Importantly, by allowing independent representatives, representatives from the currently named interest groups would not be precluded from applying to or serving on the panel.



RECEIVED

By: OAH on 9/21/2020 @ 3:51 pm

Joshua Crosson

September 21, 2020

Honorable Administrative Law Judge Eric Lipman,

EdAllies is a statewide education advocacy nonprofit with a vision to ensure every Minnesota student has access to a rigorous and engaging education. Growing a high-quality, diverse teacher workforce is a lynchpin of our mission.

For over 18 months, we have worked with a coalition of alternative teacher preparation providers, nonprofits, and advocacy organizations to understand barriers and needs, and strategies to advance this pillar of our work. We believe clear, fair rules are essential to the success and growth of effective pathways to the classroom, and have closely tracked the rulemaking process, submitting recommendations via the Office of Administrative Hearings for every R4576 rule draft. The goal of our recommendations is to ensure a clear, fair, and student-centered system for preparing future teachers, that also allows for high-quality, diverse educators to have multiple pathways to the profession.

We deeply appreciate and recognize the hard work of PELSB board members and staff to strengthen the draft regulations, and to take the feedback from a variety of stakeholders. With that said, there are four significant areas of concern where the draft rules not only impede effective programs but exceed PELSB's rulemaking authority and run counter to statutory language and intent. We also highlight smaller technical recommendations and share areas of commendation.

R4576 CONCERNS AND RECOMMENDATIONS

1) TEACHER EDUCATOR REQUIREMENTS

On Friday, August 28, during the revision phase but after the public comment period, PELSB adopted a requirement that all teacher instructors complete a state-approved teacher preparation program. This last-minute change, along with others adopted during that meeting, was never discussed at any point during the R4576 subcommittee meetings. The public board meetings also never addressed this proposal, and the public never had an opportunity to review or comment. The process was done without the transparency expected of our rulemaking agencies.

Additionally, new requirements for Standards 23 and 24 conflict with Minnesota Statute 122A.2451,¹ which clearly articulates that the Board must permit a teacher educator of an alternative preparation program to use "nontraditional criteria to determine qualifications of program instructors, including permitting instructors to hold a baccalaureate degree only." Statute provides some examples of what nontraditional means and lists things like previous work experiences, teaching experiences, educator evaluations, industry-

¹ Minnesota Statute 122A.2451.

recognized certifications, and other essentially equivalent demonstrations. Statute specifically states that alternative teacher preparation programs are permitted to have program instructors who hold a Baccalaureate degree only. We see very little ambiguity in the law and believe that the proposed draft rules exceed what is allowed in statute and represent administrative overreach.

Currently, educators have the ability to obtain a license, be remarkable educators, and train future educators. For example, in Minnesota, a teacher can:

- obtain licensure through the portfolio process;
- be a proven and experienced out-of-state teacher or private school educator; or,
- become an experienced, licensed educator through Minnesota's licensure laws, all without having completed a teacher preparation program.

Nearly 400 people have gone through the licensure via portfolio pathway—including several in licensure shortage areas—and have demonstrated competency on the same standards as individuals who completed teacher prep. Furthermore, over 1000 individuals taught on a Tier 2 license in the 2018-19 school year, many of whom have not completed a teacher preparation program.²

2) PROGRAM REVIEW PANEL (PRP) MEMBERSHIP

The membership requirements for the program review panel (PRP) in lines 31.19-32.1 of the proposed rule also fail to reflect the goals of the PRP, instead defaulting to special interests. This change was also finalized in the revision phase after the public comment period. Enumerating special interest groups—Education Minnesota and the Minnesota Association of Colleges for Teacher Education (MACTE)—is a shortcut that does little to clarify the qualifications of PRP membership, while potentially creating conflicts of interest. The PRP was designed for effective, knowledgeable professionals in teacher preparation to review the qualifications of prospective teacher preparation, regardless of whether they are higher education programs, alternative preparation programs, or nonconventional programs. The panel should be as objective as possible in determining whether the preparation programs meet the requirements to become a Minnesota-approved teacher preparation program.

PELSB's proposed regulation of giving a permanent seat to two organizations that have missions tied to very specific stakeholders leads to potential conflicts of interest. This calls into question the objectivity and fairness of the panel. Education Minnesota and MACTE, as organizations, have published statements and spoken out against alternative teacher preparation programs in the past and advocated against them including in a Star Tribune article written by Education Minnesota's president entitled, "Why Minnesota teachers union opposes Teach for America," which also references a letter Education Minnesota and MACTE sent to Governor Dayton requesting he veto funding for the alternative teacher preparation program.³

² PELSB August 2019 Data request; Kaput, K. (November 7, 2019). "New Report Undercounts Teachers of Color." EdAllies. <https://edalliesmn.org/blog/new-report-undercounts-minnesotas-teachers-of-color/>

³ Dooher, T. (June 5, 2013). "Why Minnesota teachers union opposes Teach for America." Star Tribune. <https://www.startribune.com/why-minnesota-teachers-union-opposes-teach-for-america/210324801/?refresh=true>

Leadership from these groups have also testified at the Legislature—including at the March 11, 2020 Senate E-12 Finance and Policy Committee—to defund alternative programs calling them “shortcuts to licensure.”⁴

Because these organizations represent and defend an already established market of standard, higher education centered teacher preparation programs, and have advocated to undermine alternative or nonconventional teacher preparation programs in Minnesota, it is unreasonable to name these organizations as permanent members of a panel that would determine the fate of new and innovative teacher preparation programs going forward.

Furthermore, these groups only represent certain preparation providers and teachers. MACTE does not represent alternative teacher preparation providers, which are not based in institutions of higher education. Education Minnesota does not represent the thousands of Minnesota charter school teachers who serve about 7% of the state’s K-12 public school enrollment, including larger proportions of students of color and English Learners.⁵ Therefore, these organizations have an incentive to deny certain teacher preparation programs that would otherwise be market competition or support staffing needs of the charter school sector—biases which have already been reported by Minnesota-approved alternative teacher preparation programs.

Listing specific organizations to serve on the program review panel is also unprecedented. Of the nearly 20 states we’ve reviewed, not one required their program review panel participants to be aligned with or members of a special interest organization. Instead, other states refer to the qualities of a program review panelists such as their level of experience and mastery of the topic. We recommend PELSB makes changes to align with the practice, not allocating seats to organizations, but creating individual requirements for applying to be a reviewer and laying out preferred qualifications, including:

- Knowledge and experience in the PK-12 and/or higher education setting;
- Track record of working collaboratively with peers with diverse views;
- Desire to cultivate different approaches to educator preparation; and more.⁶

RECOMMENDATION

We recommend adopting the language previously proposed in draft #4:

“PRP membership ~~shall~~ must include representation from organizations and individuals including, but not limited to, the Professional Educator Licensing and Standards Board, ~~Minnesota Association of Colleges for Teacher Education, the Minnesota Department of Education, and Education Minnesota~~ teacher preparation providers, licensed teachers, and school districts.”

⁴ March 11, 2020, Senate E-12 Finance and Policy Committee. Go to minute 35.

http://mnsenate.granicus.com/player/clip/4908?view_id=&meta_id=24377&redirect=true

⁵ Minnesota Association of Charter Schools. (February 25, 2020). “A Primer on Minnesota Charter Schools.” MACS.

https://www.mncharterschools.org/_uls/resources/2.25.20_A_Primer_on_Minnesota_Charter_Schools.pdf

⁶ Massachusetts Education Prep Reviewers.

<http://webcache.googleusercontent.com/search?q=cache:5wcrurJRp00J:www.doe.mass.edu/edprep/reviewers/faq.html&hl=en&gl=us&strip=0&vwsr=0>

We support and previously endorsed this language because it will help to ensure that the PRP process is fair and unbiased. Avoiding an interest-group focus will expand the field and allow individuals from diverse teacher preparation and classroom backgrounds to be reviewers, as well as mitigate bias and subjectivity. Furthermore, this would not exclude individuals from the aforementioned groups from applying to be on the PRP.

3) APPROVAL TIMELINE

We are concerned about the timeline for initial and continuing approval as laid out in lines 19.29-25.10. We believe this rule is unreasonable. As it stands now, it would take prospective teacher preparation programs at least 15 months for their initial approval, and at least 14 months for a continuing approval. These excessively long timelines could be a barrier to attracting high-quality alternative teacher preparation programs, which will have to go through the initial unit approval process. More specifically, these timelines would be prohibitive for small organizations that cannot staff a unit approval team for over a year for a program that might not even be approved. There is also no assurance that a lengthier process improves the quality of teacher preparation programs. The process must be streamlined to allow for speedier approval, particularly if a program is running successfully in another state and has proven experience running high-quality programs.

This barrier to approval is excessive and unreasonable especially for smaller preparation programs that are often not linked to higher education institutions. Alternative teacher preparation programs have been proven to increase the racial diversity of teacher workforces across the country. Furthermore, alternative programs have seen increases in teacher candidate enrollment over the past decade, while traditional teacher preparation has seen steep declines in enrollment, nationally and in Minnesota. Specifically, enrollment in alternative teacher programs increased by more than 40%, with some states seeing even bigger jumps, indicating a clear demand for these programs.⁷ This applies to teachers of color as well. During the 2016-17 academic year, 47% of those enrolled in alternative teacher preparation identified as prospective teachers of color, as opposed to 26% in traditional preparation programs.⁸

To give a sense of what PELSB is currently proposing, we lay out the approval process in the tables below, first for initial approval, and then for continuing approval.

Proposed R4576 Steps in Initial Approval Process	Proposed Amount of Time
Line 19.22: Provider must submit a notice of intent to apply for initial unit approval	Varies based on provider pre-planning

⁷ Partelow, L. (December 3, 2019). "What to Make of Declining Enrollment in Teacher Preparation Programs." Center for American Progress.

⁸ Higher Education Title II Reports.

Lines 20.1-20.3: Within one month of the receipt of the notice of intent, board staff must schedule an information meeting with the provider to review the approval process and jointly agree on dates for the site visit.	One month
<p>Lines 20.4-20.12: Site visit. Prior to the site visit, the following must happen:</p> <ul style="list-style-type: none"> At least 12 months prior to the site visit, the provider must provide a self-study, including supplemental evidence, for review. At least one month prior to the site visit, the provider must submit an interview schedule to board staff. The review team must review the submitted self-study and supplement evidence and provide feedback on areas of deficit at least 6 months prior to the site visit. The provider may provide a supplemental narrative and additional evidence to address deficit areas at least one month prior to the site visit and may not provide additional evidence after this time. 	At least 12 months
Lines 21.5-21.7: Within one month of the site visit, board staff must provide the written report of findings and recommendations to the unit leader. Within one month of receipt of the review team's report and recommendations, the provider may respond to factual errors.	1-2 months
Board determination: There is no specified time within which the Board must issue a decision. However, PELSB has added a Teacher Preparation Committee that will review the application before it goes to the Board. The Board meets only once a month.	At least one month
Total	At least 15 Months

Proposed R4576 Steps in Continuing Approval Process	Amount of Time
Starting on the Line 23.12: Continuing approval is valid for six years. A unit must apply for continuing unit approval by scheduling an informational meeting with the board staff, jointly agreeing upon the dates for a site visit, and following the procedures under subpart 1a, items C to F.	N/A
<p>Lines 20.4-20.12: Site visit. Prior to the site visit, the following must happen:</p> <ul style="list-style-type: none"> At least 12 months prior to the site visit, the provider must provide a self-study, including supplemental evidence, for review. At least one month prior to the site visit, the provider must submit an interview schedule to board staff. The review team must review the submitted self-study and supplement evidence and provide feedback on areas of deficit at least 6 months prior to the site visit. The provider may provide a supplemental narrative and additional evidence to address deficit areas at least one month prior to the site visit and may not provide additional evidence after this time. 	At least 12 months

Lines 21.5-21.7: Within one month of the site visit, board staff must provide the written report of findings and recommendations to the unit leader. Within one month of receipt of the review team's report and recommendations, the provider may respond to factual errors.	1-2 months
Board determination: There is no specified time within which the Board must issue a decision. However, PELSB has added a Teacher Preparation Committee that will review the application before it goes to the Board. The Board meets only once a month.	At least one month
Total	At least 14 Months

RECOMMENDATION

We recommend changing the site visit requirement, found on line 20.4, from 12 months to 6 months. While PELSB has said that a program could apply for a discretionary variance to expedite the review process, this should not justify an excessive standard timeline. Changing the timeline to at least 6 months would align with recommendations from alternative providers who have gone through the process in Minnesota, while also allowing applicants to take longer if necessary. A speedier review process would remove a barrier for high-quality programs, especially nonconventional and alternative preparation programs, without undermining the due diligence necessary to approve programs.

4) NEW TIERED LICENSE DEFINITIONS

We are concerned about the proposed definition of "professional license" found in lines 3.8-3.10 of the proposed rule. We do not believe PELSB has the authority to define teacher licenses in this way. In the SONAR, PELSB explained that they seek to distinguish "licenses that are emergency in nature and licenses that represent a demonstrated competence in particular subject matter and scope" by naming Tier 3 and 4 licenses as "professional." This language undermines Minnesota's tiered licensure laws, which gives educators at all points in their career clear and fair pathways to the profession.

Tier 1 and Tier 2 licenses are teacher licenses in law. They are not called "emergency licenses" nor does the law claim that teachers with a Tier 1 or Tier 2 license do not demonstrate competence in a particular subject. In fact, many Tier 1 and Tier 2 teachers have advanced degrees, several years of high-quality and effective teaching experience, and are accomplished teachers with demonstrated student outcomes. A Tier 1 and Tier 2 licensed educator is a licensed educator, and stating that they should only be used for emergency purposes goes against current statute 122a.181 and 122a.182, which states PELSB only has the authority to issue Tier 1 and Tier 2 licenses if requirements are met. There are no requirements in statute that "an emergency" is a prerequisite to Tier 1 or Tier 2 licensure, nor does statute give PELSB the ability to downgrade Tier 1 and Tier 2 licenses in any way. Additionally, there is no evidence that Tier 1 or Tier 2 teachers do not demonstrate competency. This assumption shows bias, which should not be integrated into policy.

It's also important to note that Tier 1 and Tier 2 teachers represent over 20% of current teachers of color and Indigenous teachers—a large proportion of educators of color, who overall account for under 5% of all Minnesota teachers. Classifying Tier 1 and Tier 2 teachers as anything other than licensed, professional, classroom teachers would disproportionately devalue educators of color and indigenous educators.

RECOMMENDATION

If PELSB sees a clear function for language to distinguish Tier 3 and 4 licenses, we recommend, on lines 3.8-3.10, amending the term “Professional license” to be “Portable license” since, unlike nonportable Tier 1 and 2 licenses, they need not be tied to a specific district or charter school.

R4576 STRENGTHS

1) We support the requirement in Standard 24 that each teacher educator of field-specific methods instruction, including reading methods, has at least three years of teaching experience as a teacher of record. We also believe that changing this proposed requirement would be unreasonable and inconsistent with current law. We recommend the requirement that teacher instructors have at least three years of teaching experience stay in-tact.

According to law, student teachers must be placed with cooperating teachers with three or more years of teaching experience.⁹ To stay consistent with the intent of this law, prospective educators should have instructors with sufficient teaching experience especially in training on teaching methods.

This proposed requirement also aligns with research that shows teacher effectiveness improves dramatically in the first 3-5 years of teaching and then plateaus.¹⁰ By requiring three years of teaching experience, this would help ensure that more teacher educators were able to maximize their own teaching effectiveness prior to teaching prospective teachers.

A common critique from teachers about their preparation program is that too much time is spent on theory rather than practice and that teacher educators are too removed from the classroom.¹¹ Requiring teacher educators have more hands-on experience in the classroom would be beneficial for teacher candidates.

2) We commend PELSB for keeping student teaching requirements at 12 weeks with at least 80% of the contracted school week of face-to-face contact time. Student teaching, along with mentorship, is one of the

⁹ Minnesota Statute 122A.69

¹⁰ Rivkin, Hanushek, and Kain (2005). “Teachers, Schools, and Academic Achievement.” *Econometrica*, 73(2), 417-458.; Clotfelter, Ladd, and Vigdor (2006). “Teacher-student matching and the assessment of teacher effectiveness.” National Bureau of Economic Research.

¹¹ Schorr, J. (2013). “A Revolution Begins in Teacher Prep.” *Stanford Social Innovation Review*.

https://ssir.org/articles/entry/a_revolution_begins_in_teacher_prep

most important components of teacher preparation. We support this language because it will ensure that teacher candidates have more time in the classroom and school environment.

TECHNICAL RECOMMENDATIONS

RECOMMENDATION 1

The current language in Lines 14.6 and 16.2, Exhibit K-5, requires programs to recruit candidates of color in proportion to student demographics. The language is ambiguous about which K-12 student population the unit would have to base their recruitment numbers on whether local, statewide, or national student demographics. Furthermore, the current language could be interpreted as a quota or even a cap, which could adversely affect students or teacher educators of color. For example, under this proposed language, a program that has 2% Indigenous teacher candidates—the current statewide percentage of K-12 students—could stop recruiting or admitting Indigenous teacher candidates. Current statute, which requires student teacher grants be distributed to increase teachers of color to match student demographics, has been implemented in a way that caps the number of grant recipients once the percentage of recipients of color has been met - an unintended consequence that could be replicated under this rule change.

We recommend amending the language to read, “(2) are of color or indigenous at least in proportion to Minnesota’s K-12 student demographic ratios.”

RECOMMENDATION 2

We recommend clarifying the use of the word “effective,” which is used 11 times in RD4576 with no definition. Any definition should include context about the desired impact or what evidence would demonstrate effectiveness.

RECOMMENDATION 3

The term “necessary to become a teacher” in line 4.18 is ambiguous and could be interpreted subjectively. We recommend amending the line to read “necessary to become a teacher as defined in 8710.2000 to 8710.8080 and the candidate's professional dispositions.”

RECOMMENDATION 4

Lines 9.9-9.10 and 14.1-14.2 require that a cooperating teacher and unit supervisor have “completed professional development in coaching strategies for adult learners.” This unreasonable requirement creates an unnecessary barrier in instances when a cooperating teacher or supervisor can show they are knowledgeable about and effective in coaching strategies for adult learners without having completed professional development. We recommend amending the language to be more output focused to read “has

completed professional development in coaching strategies for adult learners or can demonstrate competence in coaching and mentoring.”

RECOMMENDATION 5

Lines 9.16-9.17 would currently require a cooperating teacher to receive training, but neither the rule nor statute requires an organization to provide such training. It’s necessary to provide clarity on this regulation so schools and educators know where the responsibility lies. We recommend adding clarifying language about which entity—the unit, the school, the district, or the state—will provide the described training.

RECOMMENDATION 6

While we applaud the sentiment around policies that require educators to be able to interact, engage, and teach diverse student bodies (lines 10.1, 11.5, 12.11, and 28.20) and agree that teacher candidates should have as much experience as possible with students from different backgrounds, there are some practical barriers to the implementation of this requirement. Since, “who differs” is not based on individuals and not on an objective standard, the expectations would shift constantly requiring programs to have different requirements based on the make-up of their candidates. For example, programs with candidates from multi-racial, low-income backgrounds would need to show that they can educate wealthy, white students, and programs with predominantly wealthy, white candidates would have to show that they can educate ethnically diverse and low-income communities. The varying expectations would result in subjective and biased evaluations from PELS, and force candidates into schools based on their race, ethnicity, and socioeconomic background. Additionally, in more homogenous communities in Minnesota, there may not be opportunities for candidates to have experience with more diverse student populations. We recommend amending the line to read “experience with students from diverse backgrounds to the greatest extent practicable.”

RECOMMENDATION 7

Information about a unit’s program and completion requirements, financial aid, appeal processes, and procedures for responding to complaints is incredibly important for a candidate to have as they navigate their preparation program and work towards licensure. A unit must make this information accessible to all candidates regardless of their access to the internet, devices, or print material. In line 14.12, we recommend that the unit “...must make available to candidates, online ~~or~~ and in print, the...”

RECOMMENDATION 8

In lines 25.19-25.20, the proposed rule gives the board’s staff the authority to appoint review team members. This proposed rule gives an unelected, non-Senate confirmed group of aides the authority to make the final decisions about who may serve on a unit review team, which determines if teacher preparation can function in Minnesota. Under the proposed rule, the applicant may provide input to staff on who can serve on the review team, and staff have the authority to appoint members of the team directly.

Instead, we recommend the unit leader, not the staff, decide who may serve on the review team to read "the ~~board staff~~ unit leader shall..."

RECOMMENDATION 9

Lines 21.16-21.19 allow a unit to receive full continuing approval without having to provide evidence during their approval period that they have met the standards. In order to ensure quality, we recommend that PELSB require units to demonstrate that they have addressed any unmet standards during their approval period. We recommend amending the line to read "The board ~~may~~ must require the unit to submit an interim report during the approval period to demonstrate compliance with the standards identified as "Not Met" in the review team's written report."

Thank you for your attention to this very important issue.

Sincerely,

Joshua Crosson
Executive Director, EdAllies

Formal Comment Submission Memo
(36362 PELSB Request for Comments)
Teach For American Twin Cities

RECEIVED
By: OAH on 9/21/2020 @ 4:14 pm

Mikisha Nation

To: Honorable Administrative Law **Judge Eric L. Lipman**
Members and Staff of the **MN Professional Educator Licensing and Standards Board**

From: Mikisha Nation, Executive Director, on behalf of **Teach For America Twin Cities**

OAH Docket No. 8-9021-35856 for R4576

I, Mikisha Nation, the Executive Director of Teach For America Twin Cities, submit the following comments to be considered by the Honorable Administrative Law Judge Eric L. Lipman concerning the possible amendments to the rules governing standards of effective practice and Tiered Licensure.

Context on Teach For America

Teach For America (TFA) was one of the recipients of the alternative teacher preparation grant and has been operating in Minnesota since 2009. Our mission is to ensure that all students have access to an excellent education. As an AmeriCorps program, our corps members start with a two-year commitment to provide rigorous and excellent instruction as classroom educators. A program alum, corps members continue to have a lifetime commitment to advance education equity and advocate for youth to have opportunities to learn, lead, and thrive in our community.

To date, TFA Twin Cities has trained over 300 teachers. For the past three years 30% - 45% of our first- and second-year teachers have been teachers of color. Also, during this duration, our 3-year retention rate in education has been over 85%. Additionally, for the past 7 years TFA Twin Cities has hosted an annual recruitment event to attract experienced teachers, administrators, principals, and school and system leaders to Minnesota. To date we have engaged close to 200 teachers and leaders in the event. See below for a summary of the impact this event has had on the talent landscape in the twin cities.

- 25% Average percentage of participants identifying as people of color from all events, and as high as 35% in 2017
- 32% Teachers and leaders who are licensed in a shortage subject area such as Special Education, English as a Second Language, and STEM
- 57% Average number of participants who accept a job offer from the event and move to the Twin Cities within the next 6 months

Through these efforts and our program there are now over 900+ TFA alumni in MN. Close to 70% of our 900 alumni still work in education with the vast majority of working in the K-12 as classroom educators, support staff, and administrators. As an organization that has a long standing and vested interest in the education landscape in MN, we look forward to submitting the recommendations below.

Teacher Educator Requirements

On Friday, August 28th the PELSB board adopted changes to the rules governing teacher educator requirements (see revisions made to lines 16.12). As revised, teacher educators are now required to hold a bachelor's degree, have 5 years of experience as a teacher of record **and** have completed a state approved teacher preparation program.

These new requirements are in direct conflict with *Minnesota Statute 122A.2451*, which clearly states that the board is required to use nontraditional criteria to determine qualification of program instructions, including "permitting instructors to hold a baccalaureate degree only." The added requirements are clearly overreach and do not align with the statute.

Additionally, these requirements will disallow current, high performing, professionally licensed teachers in the state of MN from pursuing roles as teacher educators. The nearly 400 teachers who have gone through the licensure via portfolio process, meeting all of the same standards as someone who has completed a teacher prep program, and all current educators who are teaching on a Tier 2 license and, through showing that they are effective and high-quality educators, can move through the tiered system, will now be ineligible.

What is most concerning, is that if implemented, this rule change could prevent teachers of color from pursuing teacher educator roles, as they are currently and systematically underrepresented in and underserved by our current state approved teacher preparation programs. There are several alternative pathways and criteria that may be used to identify qualified teacher educators that maintain a high bar and allow for greater access to these roles.

Program Review Panel Membership

I would like to address requirements related to the program review panel membership. We are concerned about naming specific organizations to be part of the program review panel on *lines 31.19-32.1*. As written, both Education Minnesota and MACTE would have seats designated on the panel for members.

Listing specific organizations will inherently limit who can participate on the panel, which can lead to excluding high-quality and diverse individuals who have relevant knowledge that could be beneficial to the panel. We recommend the panel be composed of independent representatives from relevant areas such as teacher preparation providers, educators, policy experts, and more. Importantly, by listing out independent representatives, this would not preclude anyone from the two special interest groups from applying or being on the panel.

Additionally, in conversations with alternative providers, they have expressed experiencing bias and receiving conflicting information from the current program review panel that is made up predominantly of members familiar with institutions of higher education. Alternative teacher preparation programs are not represented by MACTE and could continue to experience bias. Furthermore, charter school teachers are not represented by

Education Minnesota, so this language excludes the thousands of educators who are doing amazing and innovative work in those schools, and whose experience would be beneficial to being on the board.

Finally, despite our results and the fact that several of our corps members and alumni are part of the union, Education Minnesota has spoken out against us for years, including op-eds in the Star Tribune and statements against our program. Listing specific organizations that have political agendas limit who can participate on the panel and potentially skew the representative nature of the panel.

Recruiting Diverse Teacher Candidates

In lines 14.6 and 16.2 we suggest an amendment to the language to clarify the responsibility of the unit for recruiting a diverse pool of teacher candidates. We suggest including language that specifies that recruiting efforts should be made to develop a pool of candidates that is “at least in proportion to” the demographics of a specific K-12 student population (city, district, state). The current language is ambiguous about which K-12 student population the unit would have to base their recruitment numbers on. Furthermore, the current language could be interpreted as a quota, which could adversely affect students or teacher educators of color. For example, under this proposed language a program that has 2% Indigenous teacher candidates—the current statewide percentage of K-12 students—and could stop recruiting or admitting Indigenous teacher candidates.

Cooperating Teacher Requirements

We suggest the following potential language changes to the rules governing cooperating teacher requirements.

- *Lines 9.9-9.10:* Strike “has completed professional development in coaching strategies for adult learners.”
- *Line 9.16-9.17:* We recommend clarifying the language about which entity—the unit, the school or the district—will provide the described training.
- *Lines 14.1-14.2:* Amend the line to read “...~~completes professional development~~ demonstrates competency in coaching strategies...”

We believe that as written this requirement creates an unnecessary barrier for teachers who may be great cooperating teachers but who may have not completed this specific type of professional development. Additionally, it is important to note that completing professional development alone doesn’t mean that someone is competent in coaching teacher candidates during their student teaching or practicum. We recommend striking the line or amending the language to be more output focused to read “has demonstrated competence in coaching and mentoring.”

Furthermore, as it currently reads, the cooperating teacher must receive training, but it is not specified if the district, school or unit must provide that training. It seems inherent that districts and schools, and unit leaders would like clarity on this regulation so it’s clear about where the responsibility lies.

Equitable Access to Program Information

We suggested amending the language in *line 14.12* to read “...must make available to candidates, online ~~or~~ and in print, the...” Information about a unit’s program and completion requirements, financial aid, appeal processes, procedures for responding to complaints, etc. is incredibly important information for a candidate to have as they navigate through their preparation program and work towards licensure. If a unit offers this information in only one of those formats, rather than in both, then candidates may not see it, which creates equity and access issues. We would recommend that the unit must, at the very least, have these things posted online.

Program Review Procedures

We suggest amending the *lines 25.19-25.20* to read “the ~~board staff~~ unit leader shall...” As written, this rule will provide too much authority to the board staff by giving them the ability to make the final decisions about who is on the review team. If the board staff and the applicant cannot agree on who should be on the review team, then it would be more fair for the unit leader to make the final decision.

We also suggest amending *lines 21.16-21.19* to read “The board ~~may~~ must require the unit to submit an interim report during the approval period to demonstrate compliance with the standards identified as “Not Met” in the review team’s written report.” As it reads now, a unit may receive full continuing approval without meeting all of the standards and then do not have to provide evidence during their approval period that they have met the standards. In order to ensure quality, we recommend that PELSB require units to demonstrate during their approval period that they have met any unmet standards.

Conclusion

Thank you for receiving our comment. We are deeply committed to advocating for and working toward a more diverse teaching force in the state of MN and feel strongly that the potential rule changes we referenced may impact our ability to do so. We feel strongly that our suggestions would in no way limit our state’s ability to ensure more truly high-quality, effective, and diverse teachers are in the classroom impacting our students.

Respectfully submitted by,



Mikisha Nation

Executive Director | Teach For America - Twin Cities
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Senator Eric Pratt

Proudly representing District 55



3219 Minnesota Senate Building
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Saint Paul, MN 55155
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August 31, 2020,

RECEIVED

By: OAH on 8/31/2020 @ 6:36 pm

Brian Rappe
Board Chair
Professional Educator Licensing and Standards Board
1021 Bandana Blvd. E., Suite 222
Saint Paul, MN 55108-5111

via electronic delivery

Chair Rappe, Director Liuzzi and members of the Professional Educator Licensing and Standards Board:

I realize that my comments are coming after the official comment period. I believe my perspective, as the Senate author of the underlying statute, is based on my experiences with stakeholders during the legislative process and deserve consideration.

Before I begin addressing specific concerns, I thought it would be helpful to review the conditions that led to the effort to update the teacher licensure statute. The effort initially started with a Office of Legislative Auditor report which found a number of issues. On March 14, 2016 the OLA stated *"We found that teacher licensure laws are complex and unclear. We also found that because the Minnesota Board of Teaching and the Minnesota Department of Education share responsibility for licensing teachers in Minnesota, accountability is diffuse and decision making is not always transparent."* The House and Senate Education Committees held interim hearings, with input from stakeholders with diverse experiences, to begin work on a legislative response. Rep. Erickson and I were very deliberate in disbanding the legacy Board of Teaching, creating PELSB, and writing the statute to be straightforward and with deliberate language.

To that end, and to avoid confusion that plagued the former Board of Teaching, we intentionally added 122A.09 subd 9 (d) which states ***"If a rule adopted by the board is in conflict with a session law or statute, the law or statute prevails. Terms adopted in rule must be clearly defined and must not be construed to Previous conflict with terms adopted in statute or session law."***

8705.100. PROGRAM AND UNIT APPROVAL

My primary concerns are the significant changes made in who is covered. The intent of the statute was to be open and flexible in who may develop and provide teacher preparation. The role of PELSB is not to limit who may provide a program, but that the traditional and alternative programs meet the standard set in 122A.092 and 122A.2451 . I am concerned that limiting the scope in rule to defining a teacher preparation program as *"...a Minnesota institution of higher education, school district, charter school, or nonprofit corporation organized under chapter 317A"* is more restrictive than intended. The statute did not require any program be based in a school or be a nonprofit corporation. These classifications qualify as potential teacher prep program providers, but the statute intentionally did not limit who may be a provider to allow for new models that may be developed in the future. The new definition seems to be in conflict with 122A.2475 Subd. 1.

8705.0200 DEFINITIONS.

I believe PELSB should modify the definition of Culturally Responsive Teaching to be consistent with 120B.30 Subd. 1 (q). I am concerned that PELSB is creating a new, but similar to cultural competence, definition and requirement not defined in statute. The statutory definition of cultural competence is imbedded in the requirements for the different tiered licenses. By creating a new definition in the rules, I believe the relationship between statute and rule could become confusing. Since clarity and consistency was a primary objective of 2017 revisions, and cultural competence presumes responsiveness, the rule should be rewritten to include cultures, native languages, and socioeconomic backgrounds. I recommend that "culturally responsive" be replaced with "culturally competent" throughout the proposed rules to ensure consistency with statute. The new language should be a clarification of one of the three primary statutory categories so it is not in conflict with current law, rather than a redefinition of what it means to be culturally competent or culturally responsive.

Subp. 7c. Professional License.

I am concerned with the designation of a "Professional License". This concept was raised during the legislative process and made a deliberate decision not to include the designation. The tiers inherently have different requirements and privileges, such as continuing contract rights. By designating a group of licenses as "professional", the results will be students taught by "unprofessional" teachers and undermine the tiered system.

Subp. 5. Standards for teacher educators

I am confused by the additions and concerned the changes are not aligned with statute. The additions seem in conflict with 122A.241 subd 6 (b) which requires the board must use nontraditional criteria to determine qualifications of program instructors, including permitting instructors to hold a baccalaureate degree only. The Board should ensure this Rule is consistent with 122A.241.

8705.1100 Unit Approval

The proposed revision seems to set a minimum 12-month timeline for review. I understand the need for the Board and Board staff to manage workflow and capacity to perform a thorough review. The Board should demonstrate why a 12-month period for an applicant to complete their application is necessary when some applicants indicate they can complete their application in a shorter window.

Thank you for considering my comments and perspective. I want to see PELSB to be successful and have appreciated our partnership in assuring students have competent teachers in the classroom. While I no longer serve on the Senate Education Committee, I still feel an obligation to work with the Board to assure the legislative intent and input from stakeholders is protected, and that key policy changes are addressed through the legislative process.

Respectfully,



Senator Eric Pratt

CC:

Sen. Carla Nelson

Judge Eric L. Lipman

Rep. Cheryl Youakim

RECEIVED

By: OAH on 9/17/20 8:31 am

SENATOR CARLA NELSON
Senator District 26

Minnesota Senate Building 3235
95 University Ave West
St. Paul, MN 55155
Phone: (651) 296-4848
Email: Sen.Carla.Nelson@senate.mn



Senate

State of Minnesota

September 16, 2020

Michelle Hersh Vaught, Rulemaking Specialist
Minnesota Professional Educator Licensing and Standards Board
1021 Bandana Blvd. E
Suite 222
Saint Paul, MN 55108

Via electronic delivery

Dear Executive Director Liuzzi, Chair Rappe and the members of the Professional Educator Licensing and Standards Board;

I am writing to join my voice with EdAllies and other groups and individuals who have asked that rules for approving and renewing teacher preparation programs be closely aligned with the letter and spirit of state statute. I recognize that the “Possible Revisions to Draft 7” document offers some changes, but I believe the following recommendations are still in order.

- According to [MINN. STAT. 122A.2451 subd. 6, part b](#): “The board must use non-traditional criteria to determine qualifications of program instructors, including permitting instructors to hold a baccalaureate degree only.” However, Standard 23 of the proposed rules conflicts with this provision by requiring teacher educators to have a bachelor’s degree plus at least five years of teaching experience, as well as national board certification or 125 hours of instructional leadership. This proposed rule conflicts with law and runs counter to the goal of allowing teacher instructors to qualify based on nontraditional criteria—like being a proven, experienced, high-quality, effective teacher or having relevant career experience.
- The Program Review Panel (PRP) is a standing committee that assists with the teacher preparation program review and approval processes. Given the important role of the PRP, it’s important that panel participants can execute the approval process without undue bias, and with a focus on how teacher education can best meet the needs of students. The current proposed rule distorts this goal by requiring that some PRP evaluators be members of special interest groups (lines 31.18 and following) with organizational missions that can conflict with the programs they are reviewing. Instead, the panel should avoid institutional bias and conflicts of interest as much as possible by being composed of independent and experienced representatives from diverse

backgrounds including established teacher preparation program instructors, licensed teachers from various school settings, school administrators, and alternative or non-institutes of higher education preparation instructors.

- In the proposed rule (lines 19.20-21.7), the initial review cycle is at least 15 months, with one of the proposed requirements (lines 20.4-20.5) requiring an applicant to submit a self-study at least 12 months before a site visit. It's recommended that PELSB amend line 20.4 to read, "At least 6 ~~12~~ months prior to the site visit..." Prospective teacher preparation programs should have access to a speedy evaluation so they can start their programming as quickly as possible. This excessively long timeline could be a barrier to attracting high-quality alternative teacher preparation programs to Minnesota.
- In the proposed rule (lines 3.8-3.10), PELSB seeks to distinguish "licenses that are emergency in nature and licenses that represent a demonstrated competence in [a] particular subject matter and scope" by naming Tier 3 and 4 licenses as "professional." This language undermines the intent of the tiered licensure system, giving educators at all points in their career clear and fair pathways to the profession. It implies that the thousands of Tier 1 and Tier 2 teachers are not professionals. Tier 1 and 2 teachers are licensed and often full-time educators who fill teacher shortage areas and are much more diverse than Tier 2 and 3 teachers. In fact, 1 in 5 Minnesota teachers of color and Native American teachers teach with a Tier 1 or Tier 2 license. If any distinction must be made beyond the existing tiers, Tier 3 and 4 licenses could be referred to as "portable" or "permanent" because an individual can hold the license even if they are not actively working in a specific district, and Tier 1 and Tier 2 licenses could be referred to as "school-based".

PELSB has the opportunity and responsibility to make the teacher preparation program approval process compliant with current law and legislative intent. I encourage PELSB to welcome high-quality teacher preparation programs through streamlined and innovative paths that can help diversify the teacher workforce and provide more, high-quality pathways to the classroom.

Thank you for your consideration.



Senator Carla Nelson

Sondra Erickson
State Representative
District 15A
Kanabec, Mille Lacs and Sherburne
Counties



Minnesota House of Representatives

RECEIVED

By: OAH on 9/17/20 8:31 am

Former

COMMITTEES:
CHAIR, EDUCATION INNOVATION POLICY CHAIR, ETHICS
EDUCATION FINANCE
TAXES
PROPERTY TAX AND LOCAL GOVERNMENT FINANCE DIVISION

Dear Administrative Law Judge Lipman,

The following are my comments following the public hearing held Tuesday, September 1, 2020, concerning the proposed rules drafted by the Professional Educator Licensing and Standards Board (PELSB) regarding teacher preparation program approval and oversight. I raise two main concerns for your consideration. First, I will briefly share my concern that the process PELSB has followed has not been transparent. Second, I will touch upon several issues I have with the rules and their relation to or conflict with Minnesota statutes.

Process Concerns

On Friday, August 28, 2020, PELSB held a special meeting in which several substantive revisions were made to the draft rules only two business days prior to the scheduled public hearing. On Monday, August 24, 2020, PELSB sent out a public notice for the special board meeting to be held Friday of that same week, but the email notification did not mention rulemaking as a key item on the agenda. The meeting agenda, which is accessible through a link within the email, included R-4576 Rulemaking under unfinished business.

At the special board meeting, the board adopted six pages of changes and revisions to the proposed rule draft. While I concede that the agenda included a reference to rulemaking, I do not believe the public notification and draft agenda were clear to interested parties that the "unfinished business" to be discussed was to include substantive revisions to the proposed rules only hours before the scheduled public hearing. This lack of transparency limited interested parties in their ability to participate or provide input to the board, and more importantly, time to sufficiently prepare either oral or written comments for the hearing on Tuesday morning, September 1, 2020.

Proposed Rules Concerns

Cultural Competency

This issue has taken on new importance these past few years, and the Legislature has worked to address these matters in the area of K-12 education, with more work to be done. One of the steps taken by the Legislature was enactment of a definition of cultural competency, found in section 120B.30, subdivision 1, paragraph (q). This is also followed by revisions to the teacher licensing



requirements that established multiple pathways to enter the classroom, and requires teachers either to participate in complete cultural competency training (sections 122A.181 and 122A.182) or demonstrate cultural competency in their professional growth (section 122A.187).

In the adoption of rules for teacher licensure, Minnesota Rules Chapter 8710, PELSB established a definition of cultural competency training that, in my opinion, stretched beyond the statutory requirements found in section 122A.181 and section 122A.182. The concern here, however, is the proposed rule definition for “cultural responsive teaching” bares little similarity to the statutory definition of cultural competency in section 120B.30, subdivision 1, paragraph (q), or even a similarity to the definition of “cultural competency training” found in Minnesota Rules 8710.0310. These contradictions only lead to confusion, and efforts should be made to provide symmetry between the statutory definition and definitions within the various rules.

Professional License

One of the most egregious elements within the proposal rules is a definition of a “professional license” which excludes the Tier 1 and Tier 2 licenses established in section 122A.181 and 122A.182, respectively. In no way does that statute imply that a Tier 1 or Tier 2 license should be defined as anything less than a professional license.

Additionally, this definition is in clear conflict with Minnesota Rules 8710.0310, subpart 1 K, that defines a professional license from another state “as a professional teaching license issued by the responsible state agency of another state and required by the law of that state for an individual to teach in a public school, but does not include an emergency, temporary, or substitute teaching license.” If this definition were found in another state’s statute or rule, it would clearly include the Tier 1 and Tier 2 licenses issued by the Professional Educator Licensing and Standards Board, which is the responsible state agency, and meets the requirements of our state statutes for a teaching license issued by the state to teach in our public schools. As referenced earlier, the statute does not define or characterize the Tier 1 and Tier 2 license as an emergency, temporary, or substitute teaching license.

It is worth noting that during the rulemaking process for the current rules 8710, that PELSB proposed a similar definition for a “professional license” excluding the Tier 1 and Tier 2 license, but that proposal was dropped in the face of significant opposition.

Alternative Teacher Preparation Programs

Minnesota Statutes 122A.2451 details the process for PELSB to approve alternative teaching preparation programs. Section 122A.09, subdivision 9 and section 122A.092 directs PELSB to adopt rules for alternative teacher programs governed by section 122A.2451. Traditional or conventional teacher preparations programs are governed under section 122A.092.

A review of the proposed rules for teacher preparation programs provides virtually no differences between the review and approval process for a conventional teacher preparation programs under section 122A.092 and alternative teacher preparation programs under section 122A.2451.

While the statutes provide a clear differentiation between conventional and alternative teacher preparation programs, the proposed rules do not echo that differentiation with a differing process for review and approval. A case in point is the definition or requirements for “teacher educators,” otherwise referred to as “program instructors” in statute. Section 122A.2451 clearly directs PELSB to “use nontraditional criteria to determine qualifications of program instructors, including permitting instructors who hold a baccalaureate degree only.” However, the proposed rules apply a universal set of standards for teacher educators, applying then the same program instructor requirements to conventional and alternative teacher preparation programs, which is in clear conflict section 122A.2451.

Program Review Panel

While not specified in statute, I add my concerns on the “Program Review Panel,” which exists in the current rule and is revised in the proposal rules. My main concern is the inclusion by rule specifying that the review panel membership will include the Minnesota Association for Colleges for Teacher Education, and the state’s teacher union, Education Minnesota. With the Legislature’s intent focus on creating non-traditional and new pathways into the teaching profession, the mandated inclusion of two organizations committed to the status quo would run contrary to this statutory direction.

The Minnesota Association of Colleges for Teacher Education are logically interested in protecting the best interests of their members, higher education institution-based teacher preparation programs, which may come at the detriment of providing a fair review of alternative teacher preparation programs. Similarly, Education Minnesota holds a conflict of interest in their representation of post-secondary faculty, and their previous opposition to organizations such as Teach For America. While these organizations surely have a valuable voice in approving teacher preparation programs, their conflicts of interest should be better mitigated than what is proposed in the current draft rules.

The current draft makes only a veiled reference to any potential balancing voices with “varying types of teacher preparation,” which sounds like it could include alternative teacher preparation programs, but that is not specified. In fact, PELSB could meet their own rule requirement in appointing a representative from a university or college based nonconventional program.

Thank you for your time and consideration of these concerns. I ask that your report direct the Professional Educator Licensing and Standards Board to correct these deficiencies, in so far as you find concurrence.

Sincerely,



Sondra Erickson
State Representative 15A

RECEIVED

By: OAH on 9/18/2020

From: [Scheibel, Jim](#)
To: [Vaught, Michelle H \(PELSB\)](#)
Subject: Support for addition to Minnesota Rules, Chapter 8705
Date: Thursday, September 17, 2020 2:19:20 PM

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Dear Judge Eric L. Lipman and Members of the Professional Educators Licensing and Standards Board:

This is a strong statement of support for including 3 items related to service learning in preparation of all prospective Minnesota teachers. Before listing the 3 items, here's a brief summary of my experience and career, which leads me to these conclusions:

- * The Citizens of St Paul elected me as a city council member 1982-1990, and their mayor 1990-1994
- * I served as vice president of the Corporation for National and Community Service
- * I was national director of VISTA (Volunteers in Service to America)
- * Hamline University has appointed me a "professor of public practice." I have been teaching at Hamline University thirteen years.
- * I served as Chair of the National Youth Leadership Council for 9 years.

These experiences, as well as extensive research, convince me that all teacher education programs in Minnesota should be required to

- 1) Help all prospective teachers understand the research base and rationale for service learning
- 2) Help all prospective teachers experience some form of service learning during their preparation programs
- 3) Learn how to apply service-learning to the specific group of students and specific subject(s) they are preparing to teach.

At this time in American history, there are few things more important than young people learning how they can help create a better world, using their skills, talent, insight and knowledge. Moreover, combining classroom work can help young people develop critical skills, self confidence and the belief that service to others should be part of their lives.

I strongly urge you to add the three points cited above to Minnesota Rules, Chapter 8705, Unit Standards, Subpart 1.

Sincerely,

Jim Scheibel
Professor of Practice
Hamline University

--

Jim Scheibel
Professor of Practice
Hamline University

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Senator Eric Pratt

Proudly representing District 55



3219 Minnesota Senate Building
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September 21, 2020,

Judge Eric Lipman
Administrative Law Judge
Office of Administrative Hearings
PO Box 64620
St. Paul, MN 55164-0620

RECEIVED

By: OAH on 9/21/2020

via electronic delivery

Judge Lipman:

Thank you for the opportunity to comment on the proposed teacher licensure rules R-4576. I believe my perspective, as the Senate author of the underlying statute, is based on my experiences with stakeholders during the legislative process as well as comments during the last hearing.

Before I begin addressing specific concerns, I thought it would be helpful to review the conditions that led to the effort to update the teacher licensure statute. The effort initially started with an Office of Legislative Auditor report which found several issues. On March 14, 2016 the OLA stated *"We found that teacher licensure laws are complex and unclear. We also found that because the Minnesota Board of Teaching and the Minnesota Department of Education share responsibility for licensing teachers in Minnesota, accountability is diffuse and decision making is not always transparent."* The House and Senate Education Committees held interim hearings, with input from stakeholders with diverse experiences, to begin work on a legislative response. Rep. Erickson and I were very thoughtful in disbanding the legacy Board of Teaching, creating PELSB, and writing the statute to be straightforward and with deliberate language.

To that end, and to avoid confusion that plagued the former Board of Teaching, we intentionally added 122A.09 subd 9 (d) which states ***"If a rule adopted by the board is in conflict with a session law or statute, the law or statute prevails. Terms adopted in rule must be clearly defined and must not be construed to conflict with terms adopted in statute or session law."*** It is imperative that the clarity and consistency of the rules and statutes be maintained to avoid the problems that led to the revisions passed in 2017.

8705.100. PROGRAM AND UNIT APPROVAL

My primary concerns are the significant changes made in who is covered. The intent of the statute was to be open and flexible in who may develop and provide teacher preparation. The role of PELSB is not to limit who may provide a program, but that the traditional and alternative programs meet the standard set in 122A.092 and 122A.2451. I am concerned that limiting the scope in rule to defining a teacher preparation program as *"...a Minnesota institution of higher education, school district, charter school, or nonprofit corporation organized under chapter 317A"* is more restrictive than intended. The statute did not require any program be based in a school or be a nonprofit corporation. These classifications qualify as potential teacher prep program

providers, but the statute intentionally did not limit who may be a provider to allow for new models that may be developed in the future. The new definition seems in conflict with 122A.2475 Subd. 1.

8705.0200 DEFINITIONS.

I believe PELSB should modify the definition of Culturally Responsive Teaching to be consistent with 120B.30 Subd. 1 (q). PELSB is creating a new definition and requirement and not defined in statute that are similar in nature to Cultural Competence. The statutory definition of cultural competence is imbedded in the requirements for the different tiered licenses. By creating a new definition in the rules, the relationship between statute and rule could become confusing. Since clarity and consistency were primary objectives of 2017 revisions, and cultural competence presumes responsiveness, the rule should be rewritten to include cultures, native languages, and socioeconomic backgrounds. The new language should be a clarification of the three primary statutory categories, and not exclude any of the categories, to assure there is not a conflict with current law. The Board should have approached the legislature to address changes that impact 120B.30.

Subp. 7c. Professional License.

I am concerned with the designation of a “Professional License”. This concept was raised during the legislative process and made a deliberate decision not to include the designation. The tiers inherently have different requirements and privileges, such as continuing contract rights. This language undermines the intent of the tiered licensure system, giving educators at all points in their career clear and fair pathways to the profession. It implies that the thousands of Tier 1 and Tier 2 teachers are not professionals. Tier 1 and 2 teachers are licensed and often full-time educators who fill teacher shortage areas and are much more diverse than Tier 2 and 3 teachers. In fact, 1 in 5 Minnesota teachers of color and Native American teachers teach with a Tier 1 or Tier 2 license. If any distinction must be made beyond the existing tiers, Tier 3 and 4 licenses could be referred to as “portable” or “permanent” because an individual can hold the license even if they are not actively working in a specific district, and Tier 1 and Tier 2 licenses could be referred to as “school-based”.

Subp. 5. Standards for teacher educators

I am confused by the additions and concerned the changes are not aligned with statute. The additions seem in conflict with 122A.241 subd 6 (b) which requires the board must use nontraditional criteria to determine qualifications of program instructors, including permitting instructors to hold a baccalaureate degree only. The Board is required to ensure this Rule is consistent with 122A.241.

8705.1100 Unit Approval

As discussed during the September 1 hearing, the proposed revision seems to set an extended timeline for review. I understand the need for the Board and Board staff to manage workflow and capacity to perform a thorough review. However, as described in testimony, acts as a bureaucratic barrier to entry.

Objective Program Review Panel

The Program Review Panel (PRP) is a standing committee that assists with the teacher preparation program review and approval processes. Given the important role of the PRP, it's important that panel participants can execute the approval process without undue bias, and with a focus on how teacher education can best meet the needs of students. The current proposed rule distorts this goal by requiring PRP evaluators to be members of certain special interest groups with organizational missions that run counter to the programs they are reviewing. Instead, the panel should avoid institutional bias and conflicts of interest as much as possible by being composed of independent and experienced representatives from diverse backgrounds including established teacher preparation program instructors, licensed teachers from various school settings, school administrators, and alternative or non-institutes of higher education preparation instructors.

Thank you for considering my comments and perspective. While I no longer serve on the Senate Education Committee, I still feel an obligation to assure PELSB is successful in executing the teacher licensure laws to meet the needs of school districts and students, and that key policy changes are addressed through the legislative process.

Respectfully,

A handwritten signature in black ink, appearing to read "Eric Pratt", written over a horizontal line.

Senator Eric Pratt