

# R4863 Teacher Licensure, License Renewal, and other Legislative Requirements – PELSB Board Subcommittee Discussion of Comments and Recommendations

#### **Subcommittee Agenda:**

July 9, 2025 - Overview of R-4863 & Introduction to Discussion Topics/Questions

July 16, 2025 – In-Depth Discussion

July 24, 2025 - Prepare Recommendations to the PELSB Board

#### **Seven Key Topics in the Proposed Rule:**

- <u>Topic 1.</u> Implementing legislative changes that expand the exemption from a bachelor's degree requirement for licensure to include teachers seeking licensure in world language & culture, and the visual or performing arts
- <u>Topic 2.</u> Adopting required components to the renewal requirement specific to American Indian history and culture
- **Topic 3.** Streamlining certain components of the licensure via portfolio process
- <u>Topic 4.</u> Defining "meaningful progress," for the purpose of determining whether a teacher on a Tier 2 license can renew
- **Topic 5.** Early Childhood Education Licensure
- **Topic 6. Ethnic Studies licensure**
- **Topic 7.** Computer Science licensure

#### **Details of R-4863 are on the PELSB website:**

<u>Proposed Permanent Rules Relating to Teacher Licensure, Renewal, and Other Legislative Requirements / Professional Educator Licensing and Standards Board (PELSB)</u>

https://mn.gov/pelsb/board/rulemaking/rd4863/rd4863.jsp

Topic 1. Implementing legislative changes that expand the exemption from a bachelor's degree requirement for licensure to include teachers seeking licensure in world language & culture, and the visual or performing arts.

#### Overview:

- This portion of the proposed rule focuses on legislative changes that expand the exemption from a bachelor's degree requirement for licensure to include teachers seeking licensure in world language & culture, and the visual or performing arts. Previously, the bachelor's degree exemption was limited to teachers of career and technical education (CTE) and career pathways when tiered licensure went into effect in 2018.
- Like CTE, visual and performing arts is a field where successful practitioners may not necessarily have a bachelor's degree. The proposed rule allows relevant work experience to count towards licensure in lieu of a BA.
- The 2023 legislative changes exempt the following applicants from needing a bachelor's degree to qualify for a teaching license in any tier. All other tiered licensure requirements remain in effect and individuals must meet all qualifications to receive a license.

Topic 1. Implementing legislative changes that expand the exemption from a bachelor's degree requirement for licensure to include teachers seeking licensure in world language & culture, and the visual or performing arts.

# Comments: 81

Comment Summary	Number of Comments
<del></del>	
(from 81 total commenters)	
Insufficient teacher training	56
Districts will hire cheaper teachers	5
Require short term license &/or prof dev	2
Address retirement plans to solve teacher shortage	1
Affects all levels (preK-12)?	1
Artist in residence already exists	1
Community Experts have knowledge	1
Connect process to state standards	1
Create affordable pathways & scholarships instead	1
Detail the description of relevant work	1
Enhance the profession to make desirable for teachers	1
Ensure mentors are veteran teachers in same subject area	1
Exceptions should be where need is high	1
Expands teaching opportunities	1
Helps meet teacher shortage	1
Helps rural areas find teachers	1
Increases flexibility & pathways available	1
Is a portfolio option available instead?	1
License exceptions already in place	1
Lighten testing requirements to solve teacher shortage	1
Positively impacts the teaching profession in MN	1
Request accurate data of shortage area	1
Require higher pay and prof dev to solve shortage	1
Sub requires a BA degree	1
Teachers will have to mentor - adds to duties	1
Veteran teachers should review relevant work of applicants	1

Topic 1. Implementing legislative changes that expand the exemption from a bachelor's degree requirement for licensure to include teachers seeking licensure in world language & culture, and the visual or performing arts.

#### Discussion:

- The proposed rule adds details to the law passed by the Minnesota legislature in 2023.
- The law, and this proposed rule, replaces what used to be called community experts. It still requires educators to meet the same standards for full professional licensure (i.e. prep or portfolio). This policy simply reflects the reality that a BA is not required for content expertise on one's own native language. Likewise, for practitioners of visual and performing arts, BA is not a standard requirement.
- Tier 1 requirements will still apply for applicants under the proposed rule.
- PELSB already details a description of relevant work through guidance. See the PELSB website at Approved Professional Certifications and Associate Degrees.
- The PELSB licensing committee has the means to address unique cases. See the PELSB website at Licensure FAQ / Professional Educator Licensing and Standards Board (PELSB).

Topic 1. Implementing legislative changes that expand the exemption from a bachelor's degree requirement for licensure to include teachers seeking licensure in world language & culture, and the visual or performing arts.

Subcommittee Recommendation:

None. Keep the proposed rule as drafted.

### Topic 2. Adopting required components to the renewal requirement specific to American Indian history and culture

**Overview:** The 2023 state legislature created a new renewal requirement for all teachers on American Indian History & Culture. In order to renew a teaching license, a teacher must complete a training on the cultural heritage and contemporary contributions of American Indians, with particular emphasis on Minnesota Tribal Nations. The law requires the Professional Educator Licensing and Standards Board to adopt rules to implement this requirement.

- Proposed Training Requirements
- Initial training: The initial training must address:
  - 1. key concepts and terminology, including Tribal sovereignty, Tribal Nation, American Indian, and Indigenous;
  - 2. the Dakota and Ojibwe peoples' relationship with Minnesota and their unique and distinct cultural heritages and sovereignty; and
  - 3. the laws that govern how Minnesota teachers, schools, and districts work with the 11 Tribal Nations that share geography with the state of Minnesota.
- Subsequent trainings: Once a teacher has completed an initial training in American Indian History and Culture, subsequent trainings must address one of the following topics:
  - 1. promising practices for serving American Indian students;
  - 2. incorporating Dakota or Ojibwe history, language, culture, and economic contributions into curriculum, resources, and classroom activities;
  - 3. understanding historical events and treaties relevant to the relationships among the federal government, the state of Minnesota, and the 11 Tribal Nations that share geography with the state of Minnesota;
  - 4. understanding the current status of treaty and land rights for the 11 Tribal Nations that share geography with Minnesota; and
  - 5. understanding the traumatic impact of federal and state laws and policies that were in place to eliminate cultural practices and the coherence of Tribal Nations, such as the American Indian boarding school system.

### Topic 2. Adopting required components to the renewal requirement specific to American Indian history and culture

# Comments: 35

Comment Summary	
(from 35 total commenters)	Number of Comments
Too many burdens on teachers	13
In favor of the change (but no other comment)	7
teachers need the training	6
Need to cover all cultures	4
Allow district autonomy on training	1
Financing for the training needed	1
Include tribal nations in the discussion	1
Teachers need more than 1 hour of training	1
Tribal Nation members do not need the training	1

### Topic 2. Adopting required components to the renewal requirement specific to American Indian history and culture

#### Discussion

- Many commenters noted that there are too many burdens on teachers while many other commenters noted that teachers need more than 1 hour of training.
- The proposed rule adds details to the law passed by the Minnesota legislature in 2023.
  - There are areas where much work remains to be done to clarify the importance of our students learning the historical and contemporary lived experiences of American Indians in Minnesota.
  - Students requested the true history of Minnesota taught through Dakota and Ojibwe voices, Indian policies that impact all people, economics and natural resource. management, and how they can contribute to their own communities with accurate knowledge about the lives of Indigenous people in Minnesota.
  - Teachers and administrators need to learn the history themselves before they can teach Indigenous Education topics.

Question for Board Subcommittee: Should there be an hour requirement? The state model for cultural competency is 8 hours.

### Topic 2. Adopting required components to the renewal requirement specific to American Indian history and culture

Discussion (continued)

- Some commenters noted the need to cover all cultures. We have a separate requirement on cultural competency that addresses this concern.
- Allow district autonomy on training This simply defines the minimum components of the trainings.
   Educators and districts still have flexibility in how they meet the requirement.

### Topic 2. Adopting required components to the renewal requirement specific to American Indian history and culture

Discussion (continued)

- Financing for the training needed The proposed rule defines the components of the training. The law
  was passed by the Minnesota legislature in 2023.
- Include tribal nations in the discussion PELSB has met with ten out the eleven Tribal Nations individually and with the Tribal Nations Education Committee (TNEC) regularly regarding the proposed rule.
- One commenter said that Tribal Nation members do not need the training; however, the law passed by the state legislature does not exempt teachers who are Tribal Nation members.

### Topic 2. Adopting required components to the renewal requirement specific to American Indian history and culture

Subcommittee Recommendation:

- Do not set minimum hours of training.
- Encourage Tribal Nations to offer training courses for teachers and districts.
- Keep the proposed rule as drafted.

#### Topic 3. Streamlining certain components of the licensure via portfolio process

#### Overview

- Licensure via portfolio is a nontraditional pathway to obtaining a teacher license in Minnesota. An applicant may obtain a Tier 3 or Tier 4 license or add a licensure field to an existing license by successfully evidencing the required standards in one or more portfolio.
- Licensure via Portfolio is a non-traditional option for earning a Tier 3 teaching license or to add
  additional licensure fields to an existing Tier 3 or Tier 4 teaching license. Through this process, a
  teacher can submit a "portfolio," which is a collection of evidence with accompanying narratives
  describing how the teacher has the knowledge, skills and competencies required for a specific
  licensure field.
- The proposed rule combines the review and appeal process for three areas of the portfolio applications: content portfolios, pedagogy portfolios, and core skills portfolios.

#### Topic 3. Streamlining certain components of the licensure via portfolio process

# Comments: 8

Comment Summary	Number of
(from 8 total commenters)	Comments
Streamlining is good for teachers	6
Allow other documents for review	1
Be consistent in portfolio review	1
Communicate with the applicant	1

#### Topic 3. Streamlining certain components of the licensure via portfolio process

#### Discussion:

- Most comments were generally in favor of the proposed rule.
- Policy changes here help with consistency and clear communication of requirements and standards.
- One commenter indicated that we need consistency in allowing performance assessment for pedagogy, and that lesson plans & redacted student work should be an option for demonstrating standards.
- PELSB will review its consistency in applying these items in the portfolio.
- PELSB reviewed the proposed rule and noted that only the "career" fields require the CTE Core.

#### **Topic 3. Streamlining certain components of the licensure via portfolio process**

Subcommittee Recommendation:

• Remove Ag Ed, Business, FACS, Work-Based Learning, and Accommodation Specialist from the requirement for a CTE core skills portfolio, as they are not required to have the CTE Core (only the "career" fields require CTE Core).

### Topic 4. Defining "meaningful progress," for the purpose of determining whether a teacher on a Tier 2 license can renew

#### Overview

- A number of sections in Minnesota Rule 8710 ask licensure candidates to make "meaningful progress" towards meeting the requirements for their license. Currently, the rule does not define the term, which leads to discrepancies in interpretation of the rule. The proposed rule adds a clearer definition of "meaningful progress", which can assist licensure candidates on what they need for completion.
- Meaningful progress is defined in the definitions section of Rule 8710 as either: (1) completing at least 15 credits, or (2) at least 10 sub-standards within the Standards of Effective Practice. The proposed changes to the definition of "meaningful progress" do not apply to a teacher seeking or renewing a Tier 1 license. The proposed changes require teacher who hold a Tier 2 license based on the "enrollment pathway," to have demonstrative meaningful progress in order to renew their license. Additionally, the proposed changes require teachers who hold a Tier 2 license based on the "master's degree pathway," to have demonstrated meaningful progress by completing professional development aligned to the Standards of Effective Practice. Finally, the proposed changes allow a district to bypass posting a position when offering the position to a teacher who will need an Out-of-Field Permission (OFP) if the teacher is enrolled and making meaningful progress (Note: Enrollment is required for the initial OFP and meaningful progress is required at the point of renewal (or good cause)).

### Topic 4. Defining "meaningful progress," for the purpose of determining whether a teacher on a Tier 2 license can renew

# Comments: 13

Comment Summary	Number of
(from 13 total commenters)	Comments
The improved wording is helpful	8
Need to address Alternative Programs	2
Still need a clearer definition	2
Need to be specific that the teacher is currently taking	1
classes toward licensure and that the teacher is full-time	

#### Topic 4. Defining "meaningful progress," for the purpose of determining whether a teacher on a Tier 2 license can renew

Discussion:

Question for Board Subcommittee: Should this portion of the proposed rule be broken into two requirements for licenses vs. OFPs?

- Several commenters asked for more clarity and noted that alternative programs do not provide credits.
- The subcommittee could consider revision to the proposed rule, which names a percentage of the required standards or a percentage of the program requirements.
- The subcommittee could consider not using "classes" in the definition, in order to include alt-prep and because classes do not translate to the same amount of credits.
- One commenter asked about teacher status. The proposed rule means a teacher candidate who is teaching is currently taking classes towards a licensure.
- PELSB staff read through current rule 8710 to remove all statements that add "as defined by the provider" after the term "meaningful progress". Meaningful progress will have a unified definition in the proposed rule.
- The proposed changes allow a district to bypass posting a position when offering the position to a teacher who will need an Out-of-Field Permission (OFP) if the teacher is enrolled and making meaningful progress.

### Topic 4. Defining "meaningful progress," for the purpose of determining whether a teacher on a Tier 2 license can renew

Subcommittee Recommendation:

- Change the definition of meaningful progress to reflect differing requirements in teaching programs:
  - "Meaningful progress has been made toward completion of the program means the applicant is enrolled in a teacher preparation program aligned to the assignment and:
    - (1) has completed 15 credits in the program; or
    - (2) has been found by the provider to have met a minimum of 25% of the program requirements that were unmet for the candidate when the Tier 2 license was issued or last renewed."
- Remove statements in the rule "as defined by the provider", which limits the definition of meaningful progress.

#### **Topic 5. Early Childhood Education Licensure**

#### Overview

PELSB proposes adoption of the National Association for the Education of Young Children (NAEYC)
 Standards for Early Childhood Education Teachers. The proposed standards would adopt a
 nationally recognized method for teachers to be licensed as Early Childhood teachers and would
 replace the current licensure standards. For detailed information, see the NAEYC website.

#### **Topic 5. Early Childhood Education Licensure**

# Comments: 24

Comment Summary	Number of Comments
(from 24 total commenters)	
I am in favor of the license change, but no further comment	7
National standards are important	6
How does this affect current teachers?	3
Allows for national accreditation for teacher training programs	1
BA should be required in ECE	1
	1
ECE teachers need to know how to teach children with disabilities	
Issues with Cooperating Teacher qualification	1
Preschool should be an extra endorsement	1
Requesting apprentice system for ECE licensure	1
Rural districts lack available candidates	1
The current list of competencies is appropriate	1

#### **Topic 5. Early Childhood Education Licensure**

#### Discussion

- Three commenters asked how the ECE licensure change affects current teachers It does not impact their licensure.
- One commenter noted that a Bachelor of Arts degree (BA) should be required in early childhood education (ECE) licensure early childhood education teachers must still meet tiered licensure requirements in Minnesota Rules 8710.0311 through 8710.0314. This includes a requirement for a BA degree.
- One commenter noted that ECE teachers need to know how to teach children with disabilities
  - ECE teachers who teach special education have a separate license (Minnesota Rule 8710.5500).
  - All teachers receive training in various aspects of special education in order to be licensed as a teacher. This is listed in the standards of effective practice (Minnesota Rule 8710.2000), especially Standard 1 (Student Learning) and Standard 5 (Instructional Strategies).
- Issues with Cooperating Teacher qualification
  - To professionalize early childhood education and best prepare teacher candidates, preparation providers should make every effort to first find someone with a Tier 3 or 4 license to act as the cooperating teacher.
  - Given licensure and regional shortages, it is not possible to place candidates with an appropriately licensed teacher, options may be needed for any clinical experience (field experience, student teaching, or practicum) for Early Childhood Education candidates in placements with children birth to PreK (see proposed variance language)
- Preschool should be an extra endorsement the PELSB Board has issued a resolution urging expansion of various licenses to include prekindergarten, not an extra endorsement.
- Requesting apprentice system for ECE licensure Apprenticeships are district-led, but we can share this with districts.

#### **Topic 5. Early Childhood Education Licensure**

#### Subcommittee Recommendation:

- Allow variances for cooperating teacher qualifications for working in clinical experience with new ECE teachers.
  - "The cooperating teacher must have a minimum of 3 years teaching experience at the age level that the placement occurs (infant, toddler, preprimary);
  - The cooperating teacher must have the endorsement of the site director to host a pre-service teacher;
  - The cooperating teacher have one or more of the following:
    - Undergraduate degree or certificate or graduate degree in Early Childhood Education, Elementary Education, or Child Development.
    - Prior or current teaching license in K-6 education, K-6 with a preprimary endorsement or Birth to grade 3.
    - Previous experience hosting pre-service teachers with documented success (from University Supervisor feedback).
    - Documented professional development within the last five years specific to teaching at the requested level;
       and,
    - Close work with University Supervisor and Course Instructors such that each week there will be guidance provided with formal observations or informal check-ins for student teaching placements."

#### **Topic 6. Ethnic Studies licensure**

#### Overview

PELSB proposes adoption of standards for a separate teaching license for Ethnic Studies. The
proposed standards address a 2023 Minnesota law that requires Ethnic Studies in schools (Sec.
120B.251 MN Statutes). Minnesota high schools must offer an Ethnic Studies course starting in the
2026-27 school year, and elementary and middle schools must offer Ethnic Studies instruction by
the 2027-28 school year. The proposed new license standards will help ensure that Ethnic Studies
teachers meet statewide academic standards.

#### **Topic 6. Ethnic Studies licensure**

# Comments: 44

Comment Summary	
(from 44 total commenters)	Number of Comments
Imposes political bias	22
Attach to Social Studies license	12
Ethnic Studies is a positive impact on MN schools	6
Stand-alone license will not allow for a full-time teacher	2
Split up license into separate grade level groups	2
Vague descriptors	2
Reading section needed	1
Ethnic Studies is ambiguous	1
Unifies what is taught in Ethnic Studies	1
Districts will misuse OFPs for Ethnic Studies	1
PreK is not the standard license	1
Ethnic Studies does not cover all ethnicities	1
Focus on basic subjects instead	1
Tribes are independent & should not be included	1
Ethnic Studies & Social Studies are two different licenses	1
Vague descriptors-deviates from Ethnic Studies in Soc. St.	
Stds.	1
Encompasses MN Ethnic Studies Coalition findings	1
Pause rule until MDE provides framework	1
Need more skills training for teachers	1

#### **Topic 6. Ethnic Studies licensure**

#### Discussion

- Many commenters said that ethnic studies Imposes political bias; however, the Minnesota state
  legislature already passed a law mandating ethnic studies (see overview above), so the political bias
  debate does not apply to teacher licensure.
- The proposed rule unifies what is taught in ethnic studies.
- The MN Ethnic Studies Coalition workgroup that discussed and researched this issue had wide-ranging participants from Minnesota, including various teachers, students, administrators, and community members. The workgroup concluded that there are many benefits to schools that taught ethnic studies and students that took the course:
  - Taking an ethnic studies course increased measures of engagement throughout high school (e.g., attendance) as well as the probability of postsecondary matriculation.
  - In high school classrooms, pedagogical practices that are conscious of the history and process of racialization may foster more civic engagement and academic development.
  - Ethnic Studies pedagogy must be rigorous, culturally and community responsive, and reflective for it to be effective in living its promise of decolonization and challenging racism.

#### **Topic 6. Ethnic Studies licensure**

Discussion (continued)

- Attach as an endorsement to the social studies (and other?) license
  - Ethnic studies is already a part of the social studies license; however, a separate license endorsement could help social studies teachers show extended knowledge of ethnic studies.
- Stand-alone license will not allow for a full-time teacher This is a valid point. We will encourage providers to advise students to seek dual licensure for the time being. In the future, a stand-alone ethnic studies license could have the potential to lead to full employment as the requirements emerge in various districts.

Question for Board Subcommittee: Should we consider making this a social studies endorsement too?

#### **Topic 6. Ethnic Studies licensure**

Discussion (continued)

- Commenters noted the wide range of prekindergarten-grade 12 as the scope and suggested splitting up the ethnic studies license into separate grade level groups –
  - A K-6 endorsement is not required for elementary school teachers to teach ethnic studies, but an endorsement could help teachers show their extended knowledge of the subject.
  - A grade 5-12 license narrows the scope of the ethnic studies license.
- One commenter noted that districts may misuse out-of-field permissions (OFPs) for ethnic studies; however, all licensure requirements for OFPs will apply as with any other teaching license.
- One commenter requested that schools focus on basic subjects; however, the legislature has mandated ethnic studies courses in the schools.
- Commenters noted that Tribal Nations are independent & should not be included in ethnic studies; however, ethnic studies covers a broad scope that includes Tribal Nations.

Question for Board Subcommittee: After reviewing the draft change, should we move this to K-6 endorsement and 5-12 license?

#### **Topic 6. Ethnic Studies licensure**

Discussion (continued)

- The ethnic studies license is missing a component for teaching reading, which is required by the READ Act.
- Some commenters noted that the proposed rules do not match up exactly to ethnic studies portions of the social studies standards:
  - The scope of the proposed ethnic studies license goes beyond social studies because it covers more subjects than social studies (e.g. science, english)
- One commenter asked to pause the proposed rule until MDE provides framework
  - The proposed rule addresses current community needs for licensed ethnic studies teachers. We can readdress ethnic studies licensure when the Minnesota Department of Education (MDE) provides their framework for the subject.
- Need more skills training for teachers the proposed rule mandates skills training in ethnic studies.

Question for Board Subcommittee: After reviewing the draft change, does this address reading needs?

#### **Topic 6. Ethnic Studies licensure**

Subcommittee Recommendation:

- Change ethnic studies license from a preK-12 to a grade 5-12 license.
- Change ethnic studies license to a K-6 elementary level endorsement for ethnic studies.
- Add an ethnic studies endorsement for grades 5-12 teachers (social studies, ELA, or world language).
- Add in the equivalent of social studies reading standards.

#### **Topic 7. Computer Science licensure**

#### Overview:

• PELSB proposes adoption of the 2020 Computer Science Teachers Association Standards for Computer Science Teachers. The proposed standards would adopt a nationally recognized method for teachers to be licensed as Computer Science teachers. Detailed information can be found on the <u>CSTA website</u>.

#### **Topic 7. Computer Science licensure**

# Comments: 13

Comment Summary	
(from 13 total commenters)	Number of Comments
Computer Science licensure is a positive impact on MN schools	9
Allow legacy licenses for current teachers	1
Split up license into separate grade level groups	1
Computer Science teachers will leave the profession	1
National standards are good	1
This is a high-need area for teachers	1

#### **Topic 7. Computer Science licensure**

#### Discussion

- Allow legacy licenses for current teachers
  - Nothing in the rule draft would exclude current licenses that can teach computer science from continuing.
  - There was a desire in the computer science workgroup to eventually sunset the mathematics license from computer science classes, but that was suggested after a few years so the computer science area can grow first.
- Split up license into separate grade level groups
  - The K-12 license is based on national standards, and the experts in the area recommend this scope. It is also in alignment with similar MN licenses. The PELSB Board issued a resolution that expects K-12 licenses to expand to prekindergarten-12 licenses.
  - A K-6 endorsement is not required for elementary school teachers to teach computer science, but an endorsement could help teachers show their knowledge of the subject.
  - A grade 5-12 license narrows the scope of the computer science license.
- One commenter noted that computer science teachers will learn additional skills through this license and will leave the profession because private industry will hire them away. This is not an issue on which we can dwell, because it could happen to teachers in any subject.
- The computer science license is missing a component for teaching reading, which is required by the READ Act.

Question for the subcommittee: Should this be a pre-k through 12 OR a K-6 endorsement and a 5-12 license?

#### **Topic 7. Computer Science licensure**

Subcommittee Recommendation:

- Change computer science license from a preK-12 to a grade 5-12 license.
- Change computer science license to a K-6 elementary level endorsement for Computer Science.
- Add in the equivalent of Math reading standards.

#### PELSB Staff Lead



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