

November 12, 2019

Commission on Innovation and Excellence in Education

Dear Chairman Kirwan and Members of the Commission:

Thank you for inviting us to comment on the State Board of Education’s proposed new regulations (COMAR 13A.07.06 Programs for Professionally Certificated Personnel). Together we represent all 22 public and independent colleges and universities with approved teacher education programs in Maryland. As the professional educator preparation community in Maryland, we believe, as Linda Darling-Hammond so compellingly demonstrated with her research, that “teachers matter most.”

We strongly support the Commission’s laser-focus on ensuring that all children in Maryland have highly qualified teachers who have a deep knowledge of their fields of study, are well prepared to translate their understanding of their subject area into pedagogical content knowledge, are culturally competent, and have had extended mentored internships and residency experiences that fully prepare them for their careers as effective educators. We believe that teachers who are prepared to these rigorous standards will have a strong positive impact on student learning, be well equipped to close achievement gaps, and will be much more likely to be retained in this rewarding profession.

We also believe that the Commission’s commitment to invest in teachers is among the most important messages and actions you can take and is foundational to every other recommendation in your report.

The Commission’s *January 2019 Interim Report* states:

A review of existing State teacher preparation program requirements will be undertaken by the higher education institutions, the Maryland State Department of Education, Maryland Higher Education Commission, and local school systems to determine what requirements are no longer necessary and what new requirements should be added (p. 199).

This collaborative review of existing State teacher preparation program requirements never took place before these regulations went to the State Board for initial adoption on June 25, 2019.

We are concerned that these regulations, which are being fast-tracked by the State Board, are unnecessarily complex, contradictory, internally inconsistent, and in many cases, counterproductive to the outcomes we all want—to create pathways into the profession that are attractive, professional, innovative, engaging, and rigorous. We are likewise concerned about the State Board’s refusal to meet in conference with members of the Professional Standards and Teacher Education Board (PSTEB), which raised numerous concerns about these regulations and rejected their adoption for publication.

To be clear, our goal is not to avoid accountability, but rather, to build a pipeline into the profession in partnership with Maryland’s local school districts—the living laboratories of our field—where *our* success can be measured in *student* success, and where our programs can be flexible enough to attract individuals who are motivated to make the world better, one child at a time.

We have four major concerns that illustrate the unintended negative consequences of the current proposed regulations and their lack of alignment with the vision and goals of the Commission:

1. *The proposed regulations are overly prescriptive, unnecessarily constraining, and in some cases, based on incorrect assumptions.*

The current regulations will limit institutions’ ability to partner with school districts and may force some institutions to discontinue their undergraduate teacher preparation programs. The following two examples illustrate the unintentional consequences of these regulations:

- With four required stand-alone practicum experiences, these regulations assume that all undergraduate students enter teacher preparation programs during their first year of college. In reality, many students enter college undecided or change their majors once or several times. Further, many students enter teacher preparation programs as transfer students or as graduates of Associate of Arts in Teaching (AAT) programs at Maryland community colleges. For these reasons, many teacher preparation programs at four-year institutions do not begin until the sophomore or junior year and sometimes, in the case of secondary candidates, their senior year. Without having the flexibility to structure program requirements to meet the diverse needs of students who enter programs at different points of time, these regulations will further squeeze the pipeline. In contrast, the Commission recommendations provide far greater flexibility in Element 2A.2 (c-d), stating that the practicum can be consecutive or occur throughout the teacher training program and that institutions and schools/school districts are “encouraged to be creative and flexible in incorporating the additional practicum requirement into the existing program of study.”
- Programs leading to secondary certification in content areas and dual certification cannot be completed within the proposed credit limits in these regulations. Many of these certification programs have been developed at the direct request of our K-12 school partners, including certification programs in TESOL, dual certification programs in special education, and programs in secondary STEM fields.

2. The proposed regulations are internally inconsistent and contradictory, rendering them impossible to implement.

We see no evidence that the standards and competencies in these regulations meet the components in Element 2A.1 (a-f) of the Commission’s report, which envisions that colleges and universities “offer teacher training programs and evaluate their students’ competencies at a level of rigor comparable to the countries with the top student performance.” Rather, these proposed regulations require teacher education providers to comply with the national standards adopted by 30 external professional organizations and selected by the Maryland State Department of Education. Some of these standards are more than ten years old and are inconsistent with the six pages of Maryland-specific “standards and competencies” found in later sections of the regulations. These conflicting requirements are not aligned with the Commission’s recommendation to use international benchmarks for developing standards and competencies for teacher candidates and students. To our knowledge, no crosswalks were used in the development of these regulations to align or compare any international, national, or State-developed standards.

Further, without knowing how these Maryland-specific standards and competencies were developed, we have no way of knowing whether they are evidence-based or grounded in research and effective practices. Rather, these competencies appear to be scattershot and read as internally repetitive and inconsistent—lacking any cogent frame and mimicking checklists with varying levels of granularity. The competencies and standards established by these regulations set up Maryland to be regressive and backwards as soon as new research and new knowledge in the field become available. The regulations also demonstrate a fundamental lack of understanding of how to use regulations to guide program rigor and accountability while allowing for growth and progress.

3. The proposed regulations fail to go far enough in ensuring rigor, quality, and accountability in several areas.

There are many areas in which these regulations fall short in raising standards. We would welcome the opportunity to work with the members of the Commission, State Board, and other key stakeholders to address these issues. Examples include:

- They require additional coursework in content areas in elementary education without specifying that these courses align with content that candidates will be teaching.
- They require that the three sets of pre-practicum experiences (prior to the year-long internship) be aligned with the teacher candidate’s certification area, when broader exposure to different grade levels or subject areas may better meet the needs of teacher candidates who, early on, are prone to being undecided as to grade and subject preference.
- They fail to establish clear standards or expectations for Partner Schools while establishing overly prescriptive requirements for Professional Development Schools, bifurcating the internship experience for teacher candidates.

- They separate State-level reviews of teacher preparation programs (proposing them every five years) from national accreditation reviews (which occur every seven years), leading to duplication of cost and effort and diluting the field of qualified external reviewers. These reviews were formerly conducted concurrently and collaboratively between the State and accreditor.
- They require individual teacher preparation programs to collect outcomes data school-by-school and district-by-district, including sensitive personnel information such as principal evaluations of teachers and longitudinal retention rates of teachers who graduated from our institutions. This model is unrealistic and unsustainable. Instead, the Maryland State Department of Education and the Maryland Higher Education Commission, together with the Maryland Longitudinal Data Center, should work in collaboration to build a statewide data collection and accountability system for teacher preparation.

4. *The proposed regulations are premature and cannot be implemented before there is a clear understanding of how the funding will roll out.*

Requiring all K-12 teachers who supervise and mentor student teaching interns to have a 50% teaching workload and 50% mentoring workload is pre-supposing that new money coming into the teaching profession will be dedicated to this particular vehicle for school improvement. Releasing 1,000+ classroom teachers for a full year in a manner that matches the subject area needs and geographic dispersion of teacher candidates from 22 colleges and universities is highly unrealistic unless the “teacher leader” career track is fully and uniformly implemented across the State within five years. At present, no one can guarantee that the initial funding will be used for this purpose.

Putting these requirements into place without guaranteed funding will effectively shut down all of the State’s traditional teacher education programs if local school systems cannot meet the financial and human resource requirements for mentored year-long internships. Moreover, this presupposes placement in the secondary school setting of a mentor teacher who can mentor candidates across all subject areas, an implausible and ineffectual expectation. We believe that the Commission’s recommendations in Element 2A.2 (b) are more appropriate for guiding the selection of supervising and mentor teachers. These call for the teacher career ladder to be used as a “major criteria for selection” of mentors without imposing a uniform teacher release time mandate for all schools in the State.

In closing, we are not suggesting that these are the only problems with the current regulations; rather, we are offering these as examples of serious shortcomings. Regulations that are fast-tracked with no time for stakeholder review or input before publication are bound to have inconsistencies and errors. We support the recommendations of the Commission. However, we believe that the State Board regulations as currently drafted will effectively undermine—not support—these recommendations.

Our Request:

With our shared goals in mind, we urge you to recommend that the State Board of Education reconsider the current version of the regulations in favor of a new approach that would invite knowledgeable teacher educators, K-12 educators, and school system leaders into the process to develop forward-looking, generative regulations to fulfill the promise of the Commission recommendations.

Sincerely,



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