

DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES
GOVERNING EDUCATOR LICENSURE
PUBLIC COMMENTS AND RESPONSES

Commenter Name: Lucas Harder, Arkansas School Boards Association (12/20/2021)

Comment (1): In Section 1-2.04.2 and 1-2.04.3: These should each be one lower with the deletion of 1-2.04.1.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (2): In Section 1-2.2624: There is a “the” missing from in front of “Division”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (3): In Section 2-6.02.3: This section incorrectly cites to “4-11” instead of “4-12”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (4): In Section 2-6.02.4: This section incorrectly cites to “4-11” instead of “4-12”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (5): In Section 3-1.03.4.2.2: The “4” should not be struck here.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (6): In Section 3-5.01.3.1.3: I would recommend changing “specialist” to “specialists”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (7): In Section 4-2.01: I do not believe that the colon should be struck from the end here.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (8): In Section 4-2.01.4.2: This should actually be 4-2.01.4.1.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (9): In Section 4-2.01.11: This section incorrectly cites to “4-11” instead of “4-12”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (10): In Section 4-4.0: It appears that all of the “4-4.0” here have been unnecessarily struck.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (11): In Section 4-5.01.1: The “-“ here is unnecessarily struck.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (12): In Section 4-6.01.9.4: This should be “4-6.01.5.4”.

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Division Response: Comment considered. **Non-substantive changes made.**

Comment (13): In Section 4-6.01.9.5: This should be “4-6.01.5.5”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (14): In Section 4-6.01.9.6: This should be “4-6.01.5.6”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (15): In Section 4-7.01.2: I would recommend removing “four-year college” as this appears to have been accidentally brought in and doesn’t make sense under the circumstances.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (16): In Section 4-8.01.9.4: This should be “4-8.01.6.4”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (17): In Section 4-8.01.9.5: This should be “4-8.01.6.5”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (18): In Section 4-10.01.9.6: This should be “4-10.01.4.6”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (19): In Section 4-10.0611.05.4: This section incorrectly cites to “4-10.06.2” instead of “4-11.05.2”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (20): In Section 4-10.0711.06.3.1: This section incorrectly cites to “4-10.07.3” instead of “4-11.06.3”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (21): In Section 4-4-1112.02.3.1: There appears to be an extra “4-“ here. “DESE” should be changed to “Division” here twice.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (22): In Section 4-1112.02.3.3: The “-“ appears to be unnecessarily struck.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (23): In Section 4-1112.02.3.3.1: “DESE” should be changed to “Division”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (24): In Section 5-2.02: The colon appears to be unnecessarily struck.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (25): In Section 5-2.05: This incorrectly cites to “4-11” instead of “4-12”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (26): In Section 5-4.04.1: There's no need to have the parenthetical longhand for the PLSB here.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (27): In Section 5-4.04.4: This should end in either a period or a semicolon instead of a colon.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (28): In Section 5-5.0: As all of 5-5.01 appears to be stricken, all of those under 5-5.02 should be able to be moved up to 5-5.01.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (29): In Section 5-6.01.2: There appears to be an unnecessary space between the final period and the "2" of this section number.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (30): In Section 5-6.03 through 5-6.11.1.2: With the deletion of 5-6.02, all of these should be one number lower.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (31): In Section 6-1.01.2.1: "DESE" should be changed to "Division" here.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (32): In Section 6-2.01: There is a "--" instead of a space between "The" and "Division".

Division Response: Comment considered. **Non-substantive changes made.**

Comment (33): In Section 6-2.01.2.4: "Division of Career Education" should be "Division of Career and Technical Education".

Division Response: Comment considered. **Non-substantive changes made.**

Comment (34): In Section 6-2.01.4.55: The second five here should be a four.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (35): In Section 6-3.01.3.1: There appears to be an unnecessary space in the "20201" between the final "0" and the "1".

Division Response: Comment considered. **Non-substantive changes made.**

Comment (36): In Section 7-1.01: I would recommend changing "law or regulation" to "law, rule, or regulation" to note both the State and Federal requirements.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (37): In Section 7-3.01.4: It appears that the semicolon is unnecessarily struck.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (38): In Section 7-7.02: "ADE DESE" should be changed to "Division".

Division Response: Comment considered. **Non-substantive changes made.**

Commenter Name: Dr. Vicki Groves-Scott, Dean, College of Education, University of Central Arkansas (12/17/2021)

Comment: In regard to the State Review process for teacher preparation programs. We have been told that EPPs who continue to participate in CAEP will have a review cycle that matches CAEP. However, it appears that the state review might run on a 4 year cycle and that would not fit well with CAEP (if an EPP selects to continue CAEP). "Include an on-site in-depth formative review of programs to analyze quality of programs and their inclusion of state initiatives at least every four years."

I'd like to suggest a revision to the rules that supports a cycle that fits with CAEP.

Division Response: Following public comment review, the Division has considered the CAEP accreditation cycles and requirements and will align the state review cycles to match those of CAEP. This change is clarifying and non-substantive.

Commenter Name: Stephanie Cole (01/06/2022)

Comment: I am submitting my public comment on behalf of the students with disabilities in our district. Districts are now faced even more with teacher shortages due to the pandemic. Districts are faced with significant challenges to still meet the requirements of IDEA due to the shortages. In many cases, districts must use LTS to provide special education services to remain in compliance with the implementation of IEPs. To remove this support from schools would have a significant impact on schools and the students in which they serve. Even with the use of LTS, districts are struggling to fill all of its open positions as well as to maintain its existing licensed teachers.

Employing LTS has also become a means of recruitment for districts. There are cases where LTS decide to go back to school to pursue a career in teaching special education.

Several of my colleagues were floored to find out that the removal of the LTS for special education was being proposed. I am asking on behalf of the students with disabilities that you do not remove the ability of a School District to employ a LTS to teach special education. Districts

must continue to have this support with providing instruction to our students and with meeting state/federal special education requirements.

Division Response: Comment has been considered with non-substantive changes made clarifying as follows: Beginning in the 2024-25 school year, the Long Term Substitute in Special education will not be utilized for an employment vacancy to provide a teacher of record; however, it may be utilized for instances of coverage due to a teacher of record's unavailability.

Commenter Name: Carol Brown, LEA Supervisor, Valley View Public Schools (01/07/2022)

Comment: The inability to utilize a long-term substitute for special education teachers who are on medical leave will be devastating to special education programs.

Division Response: Comment has been considered with non-substantive changes made clarifying as follows: Beginning in the 2024-25 school year, the Long Term Substitute in Special education will not be utilized for an employment vacancy to provide a teacher of record; however, it may be utilized for instances of coverage due to a teacher of record's unavailability.

Commenter Name: Donna Wake, Professor, University of Central Arkansas (01/07/2022)

Comment: Pursuant to 3-5.01.3.1, I have questions about how the state is envisioning the process to be inclusive of program-level review. In other words, what consideration is being given to program-level review compared to EPP-level review.

Division Response: The state review process is in development. At this time consideration of program level review has not been determined. The state review will pilot in fall 2022 following such pilot program level review will be determined. Comment considered with no changes made.

Commenter Name: Crissie Parks, Special Populations Director, Harrisburg School District (01/07/2022)

Comment: As a special Ed director in a small school district, I really hope this is reconsidered. We struggle to hire certified teachers and sometimes rely on long term subs when we have no other options. Please offer some alternative to this or reconsider this and survey others in my position. We already cannot can emergency licenses.

Division Response: Comment has been considered with non-substantive changes made clarifying as follows: Beginning in the 2024-25 school year, the Long Term Substitute in Special education will not be utilized for an employment vacancy to provide a teacher of record; however, it may be utilized for instances of coverage due to a teacher of record's unavailability. The Division currently offers Additional Licensure Plans and Special Education resource academies to districts and can also work with their licensure person to find already licensed personnel in their districts.

Commenter Name: Janee McElhanon, Special Education Supervisor, Nettleton (01/10/2022)

Comment: I am writing about my concerns regarding the proposed to prevent the use of Long Term Subs for special education teachers. Special Education continues to be an area of shortage and finding certified teachers becomes harder with each passing. I have had to utilize Long Term Subs when teachers are out for maternity leaves, unexpected illnesses that require a long term leave, and etc. If schools cannot use long term subs and cannot find certified special education subs, this will lead to no teachers available for our students.

Division Response: Comment has been considered with non-substantive changes made clarifying as follows: Beginning in the 2024-25 school year, the Long Term Substitute in Special education will not be utilized for an employment vacancy to provide a teacher of record; however, it may be utilized for instances of coverage due to a teacher of record's unavailability.

Commenter Name: Shawn Burgess, Asst. Superintendent for Human Resources PCSSD (01/10/2022)

Comment: Please the bolded proposed rules below: If this passes it will have a negative impact on the ability of districts to service special education students. Special education teachers are considered a shortage area in the state of Arkansas. Having the long-term substitute waiver option gives districts the ability to have a substitute in the classroom for students. Please consider keeping the SPED waiver option for Arkansas school districts.

7-1.0 LICENSURE EXCEPTIONS GENERALLY

7-1.01 Except as specifically allowed by law or regulation, no person shall be employed by a public school in an out-of-area position for more than thirty (30) instructional days unless the person meets one of the licensure exceptions of this Chapter 7.

7-1.02 The available licensure exceptions are: Emergency Teaching Permit Effective Teacher Licensure Exception Additional Licensure Plan (ALP) Administrator Licensure Completion Plan (ALCP) Long-term Substitute Teacher

(Note: Beginning 2024-2025 school year, a Long-term substitute waiver will not be available for special education.)

Thank you for your consideration.

Division Response: Comment has been considered with non-substantive changes made clarifying as follows: Beginning in the 2024-25 school year, the Long Term Substitute in Special education will not be utilized for an employment vacancy to provide a teacher of record; however, it may be utilized for instances of coverage due to a teacher of record's unavailability.

Commenter Name: Matt Vanover, Vice President for Communications and Government Affairs, CAEP (01/10/2022)

Comment: I am writing to you today as the President of the Council for the Accreditation of Educator Preparation (CAEP) about proposed changes to the rules governing teacher preparation within the state of Arkansas. It is my understanding that staff are proposing changes to remove accreditation through CAEP from the rules as an option for educator preparation providers to be recognized within the state of Arkansas, instead relying on its own process for approval. As a former Chief State School Officer from Illinois, I understand the challenges facing State Education Agencies and I urge you to consider allowing for CAEP Accreditation to continue to count for recognition in the state of Arkansas, which benefits educator preparation providers, candidates, the state education agency, and the public.

National accreditation through CAEP serves a dual purpose of ensuring accountability and fostering continuous improvement of providers. As such, our accreditation standards and process offer many benefits to the state and to providers in Arkansas.

Many of the Arkansas education preparation providers embrace and support CAEP's system of continuous improvement and rigorous standards. In fact, CAEP accredited EPPs in Arkansas are actually showing an increase in the number of candidates they enroll in teacher preparation programs, which stands in contrast to what has been occurring on the national level where providers have seen a marked decrease in candidates over the past decade. Between 2020 and 2021 nine of the CAEP accredited providers in Arkansas showed increases in the number of candidates in their preparation programs, on average 25 more candidates than the previous year. The previous year, ten EPPs in Arkansas showed an average increase of 19 candidates, from 2019 to 2020. This trend of increasing candidates at CAEP accredited EPPs shows great promise in addressing teacher shortages in Arkansas.

CAEP accreditation has many benefits for education preparation providers and states. The CAEP Standards for Educator Preparation are considered by the field to be the gold standard for teacher preparation. Standards are expensive and time consuming to develop and maintain and CAEP engages education researchers from across the country in the development and refinement of our standards. The CAEP standards are based on evidence of what is most effective in successful teaching - content expertise, clinical experience, learning outcomes for K-12 learners, and continuous improvement. CAEP bylaws require a review of the CAEP Standards every seven years. The CAEP Board of Directors created a task force in June 2020, to build on the work of the CAEP Research Committee and the CAEP Equity and Diversity Committee reviewing data and reports from more than 200 CAEP accreditation decisions, as well as feedback from stakeholders and a review of the latest research in educator preparation. It was composed of 21 representatives from the field of education, including P-12, higher education, state education departments and non-profit education organizations.

The Board approved the revised standards in 2020, which focused primarily on the consolidation, clarification, and removal of extraneous language. In addition, specific standards for technology have been added, given the increase in online learning. Equity and diversity measures have been specifically included in components of the standards to ensure proper attention is given and each provider must demonstrate progress toward recruiting and graduating a candidate pool that reflects the diversity of America's P-12 students, as well as increased flexibility in documenting candidates' academic knowledge and their learning and development.

Quality assurance systems are also costly for states to maintain, however, through CAEP's peer review process we are able to reduce the costs to states and providers. CAEP has a global reputation for quality and integrity serving 700 providers. All volunteers complete training which includes exercises to identify implicit biases that may impact decision-making. CAEP uses volunteer reviewers from a national pool to ensure consistency and impartiality in the review process. Impartiality in the review process is a key element to ensuring reviews are fair and free of any ethical question. CAEP does not allow an EPP to appoint their own reviewers. Our conflict-of-interest policies and procedures further strengthen the integrity of CAEP accreditation.

Educator preparation providers appreciate the rigorous process of CAEP accreditation. Providers are afforded multiple opportunities to respond to any concerns with multiple reviews of evidence to make sure we get it right. All decisions are calibrated with those from across the country to ensure fairness and equity. Just as CAEP accreditation promotes quality assurance from providers, CAEP also collects and uses data and evidence about our processes so that we can continuously improve as an organization.

CAEP accreditation helps providers to establish and refine quality assurance systems and many providers tell us the process has helped faculty to focus on common departmental goals. CAEP allows for the provider to generate data to support claims and fend off threats from lower quality competition. CAEP accreditation allows for a comparison with national benchmarks, creates learning opportunities and motivation for positive growth and change. Many Arkansas providers have embraced this process of continuous improvement, in fact both Arkansas Tech University and the University of Central Arkansas have received the prestigious Frank Murray Leadership Recognition for Continuous Improvement.

CAEP's partnerships with states help to ensure that the process promotes continuous improvement and eliminates duplication for providers. CAEP has enjoyed a longstanding relationship with the Arkansas Department of Education and looks forward to continuing that relationship.

Several CAEP accredited providers in Arkansas brought the state's proposed change to our attention because they support the CAEP standards and the continuous improvement they experience. I ask that you consider amending the proposed rules to allow an EPP to choose to either go through CAEP accreditation or through the state process for state recognition. Please consider amending section 3-2.01.4 to read:

IHE-based EPP is considered eligible by the Division to provide professional education programs leading to educator licensure in Arkansas if it: meets standards and requirements set forth in the Protocol for the Review and Approval of Programs of Study Leading to Educator Licensure in Arkansas approved by the State Board or is accredited by the Council for the Accreditation of Educator Preparation.

We believe that by allowing for an EPP to choose either to go through the rigorous CAEP accreditation process or through the state process it will allow for the high-quality use of CAEP

standards and procedures for those EPPs that choose to participate in CAEP accreditation without additional burdens associated with multiple reviews.

Thank you for your consideration. I am happy to respond to any questions that you may have.

Division Response: CAEP will continue as an accreditation option for Educator Preparation Programs. CAEP accreditation cycles will align with the state review cycles. Comment considered and clarifying non-substantive change made.

Commenter Name: Gary Bunn, Director, Office of Candidate Services, College of Education, University of Central Arkansas (01/12/2022)

Comment (1): In Section 3-5.01.3.1 The state review process shall, at a minimum... is detailed under Section 3-5.0 SUSPENSION OR DISCONTINUANCE OF PROGRAM APPROVAL, a punitive section that begins with "3-5.01 State approval of an educator preparation program provider is immediately suspended".

It seems that a more appropriate section for this information would be under section 3-1.04 An approved educator preparation program is subject to annual review.

Division Response: After review, public comment considered and state review process has been given its own section number 3-5.0. Comment considered and non-substantive changes made.

Comment (2): In Section 3-5.01.3.1.1 Consist of an annual desk audit to determine whether an Educator Preparation Program (EPP) is meeting continuous improvement indicators that are aligned with Arkansas' workforce needs. What is an annual desk audit?

Division Response: The State Review process is currently being developed and will include an annual audit in lieu of a specified desk audit. Comments considered. Non-substantive changes made.

Comment (3): In Section 5-5.0 ALTERNATE ASSESSMENT PLAN (AAP) separates the information about the AAP provisional into its own section. As written, the requirement of meeting other standard license requirements except for the testing requirement (as is stated in the current rules) was removed from this section. The section does not explicitly say, for example, that an AAP provisional applicant must have a degree or have completed (or be enrolled in) an educator preparation program.

Something such as the following (taken from 5-6.02 of the current rules) might better state that AAP includes the other standard license requirements:

In order to be granted a standard license in a first-time licensure area (See Appendix A) an applicant must demonstrate competency in their subject matter content on an identified

assessment as approved by the State Board. An identified alternative to this assessment may be is:

Division Response: Comments considered and clarifying technical, non-substantive change made. The alternate assessment plan can now be found within each applicable licensure section. The section now explicitly addresses completion of educator preparation program or enrollment in a pathway leading to licensure.

Comment (4): In this same section, the definition of “effective teacher” is now 1.2.29, not 1.2.31.

Division Response: Comment considered. Non-substantive change made.

Comment (5): Library Media K-12 is listed as a new option for a career-technical permit. This area does not seem consistent with other career-technical permits. The competencies for Library Media are graduate level courses.

Division Response: Library Media K-12 should not have been included on this list. It was an oversight from previous rule making and should be excluded. The Division has not issued any career-technical permits for this area. The Library Media K-12 removal from this appendix is a technical non-substantive change.

Commenter Name: Brandie Williams, Superintendent, Trumann School District (01/12/2022)

Comment: As a district administrator, I am HIGHLY concerned about the lack of licensure exception options for special education, beginning the 24/25 school year. The current Long Term Substitute option (which includes several hours of training) has been critical to ensuring operations on campuses. Without this option, we would have had empty classrooms many times. At the same time, this option has encouraged candidates to pursue special education advanced degrees and eventually licensure. My request is to maintain licensure exception options for special education.

Division Response: Comment has been considered with non-substantive changes made clarifying as follows: Beginning in the 2024-25 school year, the Long Term Substitute in Special education will not be utilized for an employment vacancy to provide a teacher of record; however, it may be utilized for instances of coverage due to a teacher of record’s unavailability. The Division currently offers Additional Licensure Plans and Special Education resource academies to districts and can also work with their licensure person to find already licensed personnel in their districts.

Commenter Name: Cody Wallis, Assistant Superintendent, Trumann School District
(01/12/2022)

Comment: With the lack of licensed special education teachers in Arkansas, it is very concerning that there is consideration for removing the long term substitute option from special education. The use of the long term sub option is beneficial to the majority of the school districts in the state of Arkansas and it provides candidates the opportunity to teach in a special education role, which often leads to the candidates pursuing a special education degree.

Division Response: Comment has been considered with non-substantive changes made clarifying as follows: Beginning in the 2024-25 school year, the Long Term Substitute in Special education will not be utilized for an employment vacancy to provide a teacher of record; however, it may be utilized for instances of coverage due to a teacher of record's unavailability. The Division currently offers Additional Licensure Plans and Special Education resource academies to districts and can also work with their licensure person to find already licensed personnel in their districts.

Commenter Name: Kerri Box, Principal, Trumann Elementary School (01/12/2022)

Comment: From my experience at the elementary level, our Special Education classrooms have been the hardest positions to fill. Without the ability to have LTS fill these positions, we would have been without a Special Education teacher this year. Finding teachers with this license is becoming a greater challenge each year. Being able to fill vacant Special Education teachers with an LTS, is a viable option for districts until a licensed teacher can be found or said LTS is able to achieve licensure. Taking this option away leaves some of our most vulnerable students at risk of not being served adequately in the schools.

Division Response: Comment has been considered with non-substantive changes made clarifying as follows: Beginning in the 2024-25 school year, the Long Term Substitute in Special education will not be utilized for an employment vacancy to provide a teacher of record; however, it may be utilized for instances of coverage due to a teacher of record's unavailability. The Division currently offers Additional Licensure Plans and Special Education resource academies to districts and can also work with their licensure person to find already licensed personnel in their districts.

Commenter Name: Paul Lazenby, Executive Director – State Managers, TEACH Arkansas
(01/13/2022)

Comment: I am writing to you in favor of the proposed Early Childhood Pre-K Teaching License as an addition to the Rules Governing Educator Licensure for the State of Arkansas. Since the Preschool to Fourth Grade (P-4) License was discontinued, the availability of higher education programs specifically dedicated to educating teachers of children in Birth to 5 programs has declined significantly. With the P-4 license no longer available, the demand for these teacher preparation programs dwindled, and most colleges discontinued them. As it stands now other than the Associate of Applied Science degree in Early Childhood that is available at

our community colleges, there are very few degree programs offering concentrated programs that educate teachers of infant, toddler, and preschool children. However, the National Research Council of the National Academy of Science has not changed their long-standing recommendation that “preschool teachers should have a bachelor’s degree with specialized knowledge and training in early childhood education.” The research has demonstrated that the youngest children in our care need teachers who have the knowledge to be effective in the classroom, and that teachers with more education will generally provide a learning environment of higher quality.

The addition of this standalone early childhood license will address the needs of public school and educational cooperative preschool programs while increasing the availability of higher education preparation programs in early childhood for ALL Birth-5 teachers in our state’s workforce. Now with the addition of the T.E.A.C.H. Early Childhood® ARKANSAS scholarship program administered by the Arkansas Early Childhood Association, our state teachers have an additional mechanism for financing a return to school to obtain their higher education degree without the burden of student loans. T.E.A.C.H. Early Childhood will pay for 90% of tuition and books for full-time working teachers who want to earn a two-year or four-year degree in early childhood areas. We also provide additional supports such as reimbursement to programs for paid release time to help students study and annual bonuses for successful completion of courses. Finally, the scholarship will cover coursework for those teachers who currently are licensed and wish to obtain their Pre-K Level, Age 3-4 Endorsement. We now have over 110 early childhood teachers in Arkansas participating in our scholarship program and earning their degree in early childhood. Of that number, 48 of those teachers are employed by public schools or education cooperatives. Unfortunately, most of these teachers are currently limited to the Associate degree. With the addition of the Early Childhood Pre-K license, demand for more four-year programs would increase and expand Arkansas’ capacity for teachers to meet the lead teacher education requirements of programs like Arkansas Better Chance and Head Start.

Should the Early Childhood Pre-K license be approved, T.E.A.C.H. Early Childhood® ARKANSAS will be committed to working with our state’s institutions of higher learning to help prospective licensees fund their coursework to obtain the new license. If anyone has questions, I would be willing and available to meet to discuss the work of AECA and the T.E.A.C.H. Early Childhood scholarship. Thank you for your consideration of the Early Childhood Pre-K license and your support of early childhood education in Arkansas.

Division Response: Comment in support of Pre-K licensure. No changes necessary.

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SECOND PUBLIC COMMENT PERIOD

Commenter Name: Lucas Harder, Arkansas School Boards Association (2/18/22)

Comment (1): TOC: In the table of contents, the headings for chapters 2 and 3 are hyperlinked while all other chapters and the appendices are not. If it is intended that all chapter headings should be hyperlinked, Chapter two has the final “s” in “Licenses” not included in the hyperlink and chapter 3 has the “For Licensure” not included in the hyperlink”.

Division Response: Comment considered and non-substantive changes made. Hyperlinks removed.

Comment (2): 1-2.2725.1: I would recommend amending “under the educational entity’s waiver of licensure” to “under a licensure exception” as that would cover all licensure exceptions, including the waiver from licensure, and would more closely match language later on in these Rules, such as the definition at 1-2.4036, as well as in the Standards for Accreditation.

Division Response: Comment considered and clarifying non-substantive change made.

Comment (3): 1-2.5854: I would recommend either adding “Education” between “Secondary” and “State” or, as “Division” was previously defined” simply amending it to be “The State Board of Education for the Division”.

Division Response: Comment considered and non-substantive change to include “Education” made.

Comment (4): 1-2.6056: As the Division has not been previously abbreviated as “DESE”, I would recommend replacing “DESE” with “Division”.

Division Response: Comment considered and non-substantive change made.

Comment (5): 2-6.0: There is not currently a 2-6.01 so all sections in this subchapter are one number higher than they should be as it starts at 2-6.02.

Division Response: Comment consider and non-substantive corrective change made.

Comment (6): 3-1.03: Based on later “EPPs” being stricken later, I believe the entire parenthetical is intended to be removed as the “EPP” is currently struck but the parentheses are not.

Division Response: Comment considered and non-substantive change made.

Comment (7): 3-1.03.4.1: The “one” here is missing a following parenthetical Arabic numeral for consistency.

Division Response: Comment considered and non-substantive change made.

Comment (8): 3-1.04.2: The “and” at the end appears to be unnecessarily struck.

Division Response: Comment considered and non-substantive change made.

Comment (9): 3.02.01.1: I believe that this is supposed to be “3-2.01.3.1”.

Division Response: Comment considered and non-substantive change made.

Comment (10): 3-3.01: I would recommend making this a 3-3.0” to match the other subchapter headings.

Division Response: Comment considered and non-substantive change made.

Comment (11): 3-3.01.1: I would recommend making this a 3-3.01” so as to provide for the subchapter heading at 3-3.0”.

Division Response: Comment considered and non-substantive change made.

Comment (12): 3-5.01.2: The word “specialists” appears twice back to back.

Division Response: Comment considered and non-substantive change made.

Comment (13): 4-2.01.3.2.4.2: There is a missing parenthetical Arabic three here for consistency.

Division Response: Comment considered and non-substantive change made.

Comment (14): 4-3.06: I believe that the citation to 4-2.11 is intended to cite to 4-12 instead.

Division Response: Comment considered and non-substantive change made.

Comment (15): 4-4.02.3.1: The “one” here is missing a following parenthetical Arabic numeral for consistency.

Division Response: Comment considered and non-substantive change made.

Comment (16): 4-5.01.6: This language appears redundant with the addition of 4-5.01.5.6.

Division Response: The Division agrees the language is redundant due to the addition of the Code of Ethics documentation as part of professional development requirements. Comment considered and non-substantive change made.

Comment (17): 4-7.01.4: The “-“ appears to be a period instead in 4-7.01.4.1 through 4-7.01.4.3.

Division Response: Comment considered and non-substantive change made.

Comment (18): 4-7.01.4.2: The “ag” appears to be missing in “pedagogical”. The “r” is missing in “through”.

Division Response: Comment considered and non-substantive change made.

Comment (19): 4-78.01: While the abbreviation for the program is indicated as switching from “APPEL” to “ArPEP”, there is not an indication in this section of the change from “Arkansas Professional Pathway to Educator Licensure” to “Arkansas Professional Educator Preparation”.

Division Response: Comment considered and non-substantive change made.

Comment (20): 4-89.01.4: The semicolon is unnecessarily struck.

Division Response: Comment considered and non-substantive change made.

Comment (21): 4-89.03.2: There is a parenthetical Arabic numeral missing after the three for consistency.

Division Response: Comment considered and non-substantive change made.

Comment (22): 4-89.03.1: For consistency with the other occurrences in the Rules, I would recommend changing this to read “License, ~~including~~ With payment of the required nonrefundable”.

Division Response: Comment considered and non-substantive change made.

Comment (23): 4-910.01.1: For consistency with the other occurrences in the Rules, the comma between “license” and “with” should be removed.

Division Response: Comment considered and non-substantive change made.

Comment (24): 5-65.065: For consistency with other occurrences in the Rules, the comma should be removed from between “holder” and “with”.

Division Response: Comment considered and non-substantive change made.

Comment (25): 5-65.076: This section is attempting to cite to itself but the in section citation has not been updated so that it still reads “5-6.07”.

Division Response: Comment considered and non-substantive change made.

Comment (26): 7-3.01.1: I would recommend changing “licensed in and has received as an Effective Teacher in summative rating” to “licensed in and has received a summative rating of as an Effective Teacher”.

Division Response: Comment considered and non-substantive change made.

Comment (27): Page 74: The word “endorsement” in “EARLY CHILDHOOD PRE-K SPECIAL EDUCATION ENDORSMENT (FOR” is missing the “e” between the “s” and the “m”.

Division Response: Comment considered and non-substantive change made.

“The curriculum/” have been repealed from all of the entries except for “CURRICULUM/ PROGRAM ADMINISTRATOR (P-12)”.

Division Response: Comment considered and non-substantive change made.

Commenter: Christopher Koch, CAEP (March 10, 2022)

Comment: Dear State Board Members and Commissioner Key,

I am writing to you today as the President of the Council for the Accreditation of Educator Preparation (CAEP) about proposed changes to the rules governing teacher preparation within the state of Arkansas. It is my understanding that staff are proposing changes to develop a new state process for the Approval of Programs of Study Leading to Educator Licensure in Arkansas. We would ask the Board to consider allowing CAEP accreditation to count for state approval for those providers who choose to pursue CAEP accreditation.

We were made aware of the proposed changes to the Department's rules by several CAEP accredited providers in Arkansas who wish to maintain CAEP national accreditation for a variety of reasons.

We ask the Board to consider allowing EPPs to either pursue the proposed Approval of Programs of Study Leading to Educator Licensure in Arkansas or to continue their ability to operate as an educator preparation provider in Arkansas by maintaining their CAEP accreditation status.

I am a former Chief State School Officer from Illinois and I understand the challenges facing State Education Agencies and the dual role of ensuring high educator preparation standards, while also listening to concerns from providers.

I ask that you consider amending the proposed rules to allow for an EPP to choose to either go through CAEP accreditation or through the state process for state recognition. Please consider amending section 3-2.01.4 to read:

IHE-based EPP is considered eligible by the Division to provide professional education programs leading to educator licensure in Arkansas if it meets standards and requirements set forth in the Protocol for the Review and Approval of Programs of Study Leading to Educator Licensure in Arkansas approved by the State Board **or is accredited by the Council for the Accreditation of Educator Preparation.**

We believe that by allowing for an EPP to choose either to go through the rigorous CAEP accreditation process or through the state process it will allow for the high-quality use of CAEP standards and procedures for those EPPs that choose to participate in CAEP accreditation without additional burdens associated with multiple reviews.

Thank you for your consideration. I am happy to respond to any questions that you may have.

Sincerely,

Christopher Koch, Ed.D.

President

Division Response: Comment considered and no changes made. State Review is a requirement of the ADE while CAEP is an option to IHEs.

