

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES GOVERNING  
EDUCATOR LICENSURE**

**PUBLIC COMMENTS AND RESPONSES**

**RECEIVED  
JULY 15 2024  
BLR**

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Commenter Name: Lucas Harder, Arkansas School Board Association; May 22, 2024

Comments: 1-1.02: “Acts 513, 657, and 746 of 2021” could be removed as they were all incorporated into the previous update to the Rules.

1-2.02: I believe that the language of “a speech- language pathology program” should instead be “an occupational therapy program”.

1-2.38: Bot the “one” and “two” are missing the parenthetical Arabic numerals afterwards for consistency with other rules.

2-1.01: I believe that “Division of Career Education” should be “Division of Career and Technical Education”.

2-1.02.3: I believe that “Division of Career Education” should be “Division of Career and Technical Education”.

2-1.03: The colon at the end of the paragraph should be a period.

2-3.02.2.1: The parenthetical “(18)” should be moved to before “credit”.

2-3.03: I believe that this is supposed to read “under this section” instead of “under this section 4.05”.

2-5.02.2: The “three” in “three credit hours” is missing the parenthetical Arabic numerals for consistency.

2-6.02.13.1.2: The “three” in “three years” is missing the parenthetical Arabic numerals for consistency.

2-7.02.5: The parenthetical Arabic numeral is missing from after “one”.

2-9.1.2.3: The “three” in “three years” is missing the parenthetical Arabic numerals for consistency.

2-9.1.5.3: The longhand and parentheses for “3” are missing for consistency.

2-9.2: I would recommend changing “who has three (3) years experience” to “at least three (3) years of experience” so that it does not read that the only mentors possible are those who have exactly three years of experience.

2-9.5: The longhand and parentheses for “3” are missing for consistency.

3-4.0.1.1.2: There appears to be an extra “an” in “accordance”.

3-4.01.1.3.1: The word “specialists” appears twice in a row.

~~5-2.05~~ 5-2.04: As Section 4-12 was repealed, I believe that this is supposed to be citing to “6-6.00”.

5-3.01: As this could be read to require that all individuals who have their license suspended have to submit these documents even if the person does not wish to have their license reinstated, I would recommend changing this to read as follows to indicate that it is a requirement only for those seeking to have their license reinstated after suspension: A licensee whose license is suspended shall provide the following in order to apply for reinstatement of the license”.

5-4.01.1: The parenthetical Arabic numerals for ten are missing for consistency.

5-4.01.2: The parenthetical Arabic numeral for five is missing for consistency.

5-4.04.3: The parenthetical Arabic numeral for three is missing for consistency.

5-4.04.6: The longhand and parentheses are missing from “30” for consistency.

6-4.02.2: The longhand and parentheses for “18” are missing for consistency.

The longhand and parentheses for “10” are missing for consistency.

6-5.03: As section 4-11.06.3 appears to be repealed, I would recommend stopping after “qualifications”.

6-11.2.3.1.8.1: The longhand and the parentheses from the “18” are missing for consistency.

7-5.04: The citation to 4-3.0 has to be updated to account for the repeal.

7-6.03.1: This seems redundant with language in 7-6.03 that already prohibits a long-term sub from being used for more than two consecutive semesters. The “two” is missing the parenthetical Arabic numeral for consistency.

7-8.02.3.1: The parenthetical Arabic numerals for “three” are missing for consistency.

Division Response: **Comments considered. Except for suggested changes regarding Section 5-3.01 and 7-6.03.1, non-substantive changes made.**

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Commenter Name: Deric Owens, Superintendent, Caddo Hills School District; May 15, 2024

Comments: The new rule on Licensure for Special Education will be a great benefit to smaller districts like mine. This is my ninth year in the district and we have had to place at least 4-5 individuals on an ALP in order to get our Sped classrooms covered. This year alone I advertised for a self contained and a regular special education teacher and did not get a qualified applicant. We were able to secure one of the positions with a certified teacher willing to go and get the required courses. If the teacher can test out this will be a huge savings. I believe the testing out would have been a viable way of adding a Sped licensed teacher rather than having to complete the full program. I hope that higher education allows this to become a pathway to certification.

Division Response: **Comments considered. No changes made.**

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Commenter Name: Dr. Jonathan Crossley, Superintendent, Hope Public Schools; May 23, 2024

Comments: Good afternoon! In reference to Draft Rule 2-9.0 Special Education Personnel Qualifications and Alternate Certifications: Additional flexibility for SPED certification (alternate routes) would enable districts that are in geographic shortage areas to better staff for need. Whether it is a "grow your own" model or adding SPED as a licensure area through Praxis examination, more flexibility would be beneficial.

Division Response: **Comments considered. The registered apprenticeship will allow for a SPED alternate route. No changes made.**

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Commenter Name: Dr. Gary Bunn, Director, Office of Candidate Services, University of Central Arkansas; May 29, 2024

Comments: Page 17.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher ...

2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

Should 2-3.02.2.2 be 2-3.02.2.1.1 to reference the "official transcript" of the option in 2-3.02.2.1?

Should 2-3.02.3 be 2-3.02.2.2 as one of the options for the provisional license? Should 2-3.02.4 be 2-3.02.2.3 as one of the options for the provisional license? For example ...

2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours ...

2-3.02.2.1.1 For out-of-country candidates ...

2-3.02.2.2 An official score report evidencing passing scores ...

2-3.02.2.3 An official score report evidencing passing alternate scores...

This section does not include the requirement to be enrolled in an EPP. Is that intentional or an oversight?

This section does not reference verification by the EPP as other sections do. Is that intentional or an oversight?

2-3.03 references Section 4-5.0 but that section has been deleted.

Page 36, should the list of PD requirements reference Appendix A to be consistent with other sections of the rules?

Division Response: **Comments considered. The questions raised are addressed in the licensure pathways chart at Appendix B added pursuant to public comment.**

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Commenter Name: Dr. Michael S. Mills, May 30, 2024.

## Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As a professor of teacher education, I respectfully submit my comments and suggestions for modification. I want to express my support for a year-long aspiring teacher residency and feel like these suggestions, listed below, will maintain the integrity of the residency requirement while allowing flexibility in implementation.

Sincerely,

Dr. Michael S. Mills

### Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the "finalized rules." As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day "ADE recommended" coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position. School districts aren't always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers.

Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

### 1-2.32 Preferred for Lead or Master destination for mentor teachers

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The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

### 1-2.27 Definition of Completer Conflict

There are differing definitions of “completer” creating a conflict between Federal definition for Title II completer and these rules’ definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state- approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

### 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of

higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

**Licensure Options for Traditional Programs**

<p>EVERYONE: Complete a degree with an embedded DESE approved educator preparation program that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	Standard licensure	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Receive a <b>provisional license</b> and meet <a href="#">AAP requirements</a>	Standard licensure
	Option 3	Passing score on a DESE approved <u>performance based</u> assessment during internship (nationally scored)	Standard licensure	
	Option 4	Test attempt (no pass)	<p>Receive a <b>provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <u>performance based</u> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	Standard Licensure

**Licensure Options Alternative Route Programs**

FOR PROVISIONAL		FOR STANDARD	
<p>EVERYONE: Admission into Arkansas educator preparation program (Must have a bachelor's or higher)</p>	Option 1	Passing content assessment	Complete approved educator prep program
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	<p>Complete approved educator prep program</p> <p>Meet <a href="#">AAP requirements</a></p>
	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	Complete approved educator prep program

SUGGESTION: Revise the rules to reflect the ADE approved options in the attached charts and make it clear that MAT candidates can work on a provisional license.

2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

## 1-2.05 Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

## ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxCjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The**

**protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Louis Nadelson, University of Central Arkansas; May 30, 2024

Comments:

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Sincerely,

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license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

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3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

SUGGESTION: Revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

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Commenter Name: Dr. Jessica Herring-Watson; May 30, 2024

Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As a professor of teacher education, I respectfully submit my comments and suggestions for modifications to the proposed rules as a means to strengthen our teacher preparation programs and address the needs of K-12 children in Arkansas.

I want to express my support for a year-long aspiring teacher residency and feel like these suggestions will maintain the integrity of the residency requirement while allowing flexibility in implementation.

Sincerely,

Dr. Jessica Herring-Watson

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Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position.

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2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-

3.02.2.2 For out- of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

SUGGESTION: Revise the rules to reflect the ADE approved options not included in the proposed rules and make it clear that MAT candidates can work on a provisional license.

### 2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

## 1-2.05 Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved.” (See link below)

<https://drive.google.com/file/d/1ZShvrhjbxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Victoria Groves-Scott; May 30, 2024

### Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As a professor of teacher education, I respectfully submit my comments and suggestions for modification. I want to express my support for a year-long aspiring teacher residency and feel like these suggestions, listed below, will maintain the integrity of the residency requirement while allowing flexibility in implementation.

Sincerely,

Dr. Victoria Groves-Scott

### Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the “finalized rules.” As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state:

“Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day “ADE recommended” coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position.

School districts aren't always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers. Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Please indicate that coaching training is preferred, not required, for the experienced mentor teacher.

### 1-2.32 Preferred for Lead or Master destination for mentor teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Please keep Lead or Master designation as preferred for the experienced mentor teacher.

### 1-2.27 Definition of Completer Conflict

There are differing definitions of "completer" creating a conflict between Federal definition for Title II completer and these rules' definition of completer, which will cause confusion.

"Educator Preparation Program Completer" means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator's provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP's catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer:

A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program's requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Please make the definition for completer consistent with the Federal Title II definition.

### 1-2.50 SPED 101 Academy

SPED 101 Academy means a ~~three (3)~~ six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Please keep SPED 101 Academy as a three (3) credit hour course.

### 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of- country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

**Licensure Options for Traditional Programs**

<p>EVERYONE: Complete a degree with an embedded DESE approved educator preparation program that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	Standard licensure	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Receive a provisional license and meet <a href="#">AAP requirements</a>	Standard licensure
	Option 3	Passing score on a DESE approved <a href="#">performance based</a> assessment during internship (nationally scored)	Standard licensure	
	Option 4	Test attempt (no pass)	<p>Receive a provisional license in the area in which the candidate was prepared and complete <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <a href="#">performance based</a> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	Standard Licensure

**Licensure Options Alternative Route Programs**

FOR PROVISIONAL		FOR STANDARD	
<p>EVERYONE: Admission into Arkansas educator preparation program (Must have a bachelor’s or higher)</p>	Option 1	Passing content assessment	Complete approved educator prep program
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Complete approved educator prep program
	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	<p>Complete approved educator prep program</p> <p>Pass a DESE approved <a href="#">performance based</a> assessment (nationally scored, encourage embedding in EPP internship) <b>AND</b> effective summative evaluation under TESS</p> <p><b>OR</b></p> <p>Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</p>

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

#### 2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Please revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

#### 1-2.05 Accreditation

##### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.” This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall. This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Christa Kuebel; May 31, 2024

Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As a professor of teacher education, I respectfully submit my comments and suggestions for modification. I want to express my support for a year-long aspiring teacher residency and feel like these suggestions, listed below, will maintain the integrity of the residency requirement while allowing flexibility in implementation.

Sincerely,  
Dr. Christa Kuebel

Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the "finalized rules." As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

1-2.32 Required Coaching Training for Mentor Teachers

The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day "ADE recommended" coaching training within a year, or even two

years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position.

School districts aren't always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers.

Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

### 1-2.32 Preferred for Lead or Master destination for mentor teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation,” allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

### 1-2.27 Definition of Completer Conflict

There are differing definitions of “completer” creating a conflict between Federal definition for Title II completer and these rules’ definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state- approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

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SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

## 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following: 2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

**Licensure Options for Traditional Programs**

<p>EVERYONE:  <b>Complete</b> a degree with an embedded DESE approved <b>educator preparation program</b> that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	Standard licensure	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Receive a <b>provisional license</b> and meet <a href="#">AAP requirements</a>	Standard licensure
	Option 3	Passing score on a DESE approved <b>performance based</b> assessment during internship (nationally scored)	Standard licensure	
	Option 4	Test attempt (no pass)	<p>Receive a <b>provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <b>performance based</b> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	Standard Licensure

**Licensure Options Alternative Route Programs**

FOR PROVISIONAL		FOR STANDARD	
<p>EVERYONE:  <b>Admission into Arkansas educator preparation program</b> (Must have a bachelor's or higher)</p>	Option 1	Passing content assessment	Complete approved educator prep program
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	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	<p>Complete approved educator prep program</p> <p>Pass a DESE approved <b>performance based</b> assessment (nationally scored, encourage embedding in EPP internship) <b>AND</b> effective summative evaluation under TESS</p> <p><b>OR</b></p> <p>Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</p>

SUGGESTION: Revise the rules to reflect the ADE approved options in the attached charts and make it clear that MAT candidates can work on a provisional license.

2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

## 1-2.05 Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

o This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrDhjbxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Michael Mills, Associate Dean of College of Education, University of Central Arkansas; May 31, 2024

Comments: My name is Dr. Michael Mills, I'm the associate dean of the College of Education at the University of Central Arkansas and thank you for allowing me to comment on the rules governing educator's licensures, I have 4 points to make. First point: as the teacher preparation provider, we have been informed by the state department that the rules we are commenting on are not the finalized rules. Meaning there may be changes that we will not have the opportunity to address in public comment. This seems inconsistent with the intent of the public commenting process, and we respectfully request that all state commentors get to see the finalized rules and have an opportunity to respond to those rules. Second Point: Regarding the requirement for the designation of lead or master interim teachers, the rules state, quote: "Experienced mentor teachers mean a teacher with a minimum of 3 years teaching experience or has an evaluation with an effective rating or higher and has received mentor coaching training. It is preferred that the teacher have a lead or master designation. This indication of preferred provides universities and other education providers with flexibility to ensure that teacher prep programs can place aspiring teachers for residency." This is especially important for the master parts and teaching program where aspiring teachers often take jobs to the record and the university does not control the placement. Therefore, It's crucial to keep that word "preferred" in the sentence, it is preferred that the experienced mentor teacher has a lead or master designation. This flexibility is necessary as schools and universities work to get practicing teachers through the master teacher designation process. Requiring all aspiring teachers to be placed with an experienced mentor teacher defined as one that has to have a lead or master designation places an extraordinary burden on practicing teachers and K12 schools and can be costly and prohibitive. Without a teacher with a lead or master designation, a school will not be allowed to have an aspiring teacher. Third point: These rules require mentor teachers to have coaching training, however with a member of mentor teachers who have student teachers and interns their classroom, and a member of university supervisors, it is impossible at this point to get everyone through a 2-day ADE quote AD recommended coaching training within a year, or even 2 years. For example, UCA alone has over 300 mentor teachers a year and 40 university supervisors. On the list of ADE recommended coaching training programs that exist currently, one program charges \$8,000 to train just 40 people, which is not feasible. Fourth and final point: UCA fully supports the move to a 1 year residency, however, there is a concern that the ADE protocol for teacher preparation that is in place now, and was developed before the final residency rules have been approved states: "A year long residency shall include a year long clinical placement for a minimum of 3 days, 18 hours per week in the first semester, and 4 days, 24 hours per week in the second semester. Programs may also use a semester equivalent to 270 hours in the first semester, and 360 hours in the second semester for licensure areas. Do not follow the traditional weekly schedule. The residency must span 2 consecutive semesters, fall to spring or spring to fall." This protocol which has been developed before the rules were finalized limits the flexibility of teacher preparation programs especially for our secondary education programs that need higher level content classes like math and science during the first semester of residency. Additionally, many districts are moving to a 4 day school week causing further issues with getting 3 days in during the first semester when college students are still taking their teaching methods classes. If the protocol were adjusted to allow for a total of 630 hours for that entire year of residency, it would maintain the hour requirement while allowing flexibility. Thank you for allowing me to comment on these rules.

Division Response: **Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

Commenter Name: Sunny Styles-Foster; June 1, 2024

Comments: Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the "finalized rules." As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day "ADE recommended" coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position.

School districts aren't always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers.

Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

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The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

### 1-2.27 Definition of Completer Conflict

There are differing definitions of "completer" creating a conflict between Federal definition for Title II completer and these rules' definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state- approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

### 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following: 2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division.

SUGGESTION: Revise the rules to reflect the ADE approved options in the attached charts and make it clear that MAT candidates can work on a provisional license.

## 2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

**SUGGESTION:** Revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

## 1-2.05 Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

o This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

**SUGGESTION:** Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

## ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrDhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education program that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

**SUGGESTION:** Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.

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Commenter Name: A. Hunt; June 5, 2024

Comments: The following is written in response to the call for public comment on the [DESE Proposed Rule Governing Educator Licensure](#).

- Public Comment closes June 10th
- Public Comment Contact Email: ADE.RulesComments@ade.arkansas.gov

Thank you for the opportunity to provide this response.

Response to rules that aren't finalized

- Education Preparation Providers (EPPs) have been told by ADE staff that the rules we are commenting on are not the finalized rules. Therefore, there are changes that we won't get the opportunity to address in public comment. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

Requirement for Lead or Master designation for mentor teachers

- These rules state, "It is preferred that the (*experienced mentor*) teacher have a Lead or Master designation," which gives EPPs flexibility to ensure teacher preparation aspiring teachers can be placed for a residency. This is extremely important for the Master of Arts in Teaching program. These aspiring teachers often take jobs and are the teacher of record on a provisional license, therefore, the EPP does not have control over the placement. There will be no guarantee that a Lead or Master teacher will be in that school to serve as an experienced master teacher.
- In the section related to the experienced mentor teacher the word preferred should be kept. The sentence "it is preferred that the (*experienced mentor*) teacher have a Lead or Master designation," allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.
- Requiring all aspiring teachers to be placed with an "experienced mentor teacher" places an extraordinary burden on practicing teachers and schools to require teachers to go through the Lead or

Master designation process that is costly and prohibitive. Without a teacher with Lead or Master designation a school would not be allowed to have an aspiring teacher.

- “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### Coaching training

- *“Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.*
- *“One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters.*

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

#### Definition of Completer

There is a conflict in definitions between these proposed rules and Federal definition for Title II completer.

- Page 8 Definitions 1-2.28 - “Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.
- Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer.  
<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

- Page 11 1-2.50 “SPED 101 Academy” means a ~~three (3)~~ six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.
- Regarding the doubling of credit hours for SPED 101 Academy from 3-6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

SUGGESTION: Please keep SPED 101 Academy as a three (3) credit hour course.

### **Provisional License**

On Page 17. 2-3.02 *The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:*

*2-3.02.1 A completed application form for the Provisional License and*

*2-3.02.2 One of the following:*

*2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or*

*2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division; (Should this point be 2-3.02.2.1.1 to clarify how transcripts for out-of-country candidates are reviewed rather than an option for “One of the following:”?)*

- DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.
- Where is the MAT program in 2-3.02?
- This section also does not indicate that completion or enrollment in an EPP is required for a provisional license.

**Licensure Options for Traditional Programs**

<p>EVERYONE:  <b>Complete</b> a degree with an embedded DESE approved <b>educator preparation program</b> that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	<b>Standard licensure</b>	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Receive a <b>provisional license</b> and meet <a href="#">AAP requirements</a>	<b>Standard licensure</b>
	Option 3	Passing score on a DESE approved <a href="#">performance based</a> assessment during internship (nationally scored)	<b>Standard licensure</b>	
	Option 4	Test attempt (no pass)	<p><b>Receive a provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <a href="#">performance based</a> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	<b>Standard Licensure</b>

**Licensure Options Alternative Route Programs**

FOR PROVISIONAL		FOR STANDARD	
<p>EVERYONE:  <b>Admission into Arkansas educator preparation program</b> (Must have a bachelor's or higher)</p>	Option 1	Passing content assessment	Complete approved educator prep program
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	<p>Complete approved educator prep program</p> <p>Meet <a href="#">AAP requirements</a></p>
	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	Complete approved educator prep program

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

SUGGESTION: Please revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

## Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

- Language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 1-2.45 Program of Study

- Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator’s license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 2-6.02.16.12

- Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: *“One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters.* The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

- <https://drive.google.com/file/d/1ZShvrdhjbxICjHhybOIs5Gbjmgu6xfE/view?pli=1>
- The ADE protocol states: *“A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.*
- This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Rachel Eells, Interim Director of School of Education, University of Arkansas at Little Rock; June 5, 2024

Comments: The following is written in response to the call for public comment on the [DESE Proposed Rule Governing Educator Licensure](#).

- Public Comment closes June 10th
- Public Comment Contact Email: [ADE.RulesComments@ade.arkansas.gov](mailto:ADE.RulesComments@ade.arkansas.gov)

Thank you for the opportunity to provide this response.

## Response to rules that aren't finalized

- Education Preparation Providers (EPPs) have been told by ADE staff that the rules we are commenting on are not the finalized rules. Therefore, there are changes that we won't get the opportunity to address in public comment. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

## Requirement for Lead or Master designation for mentor teachers

- These rules state, "It is preferred that the (*experienced mentor*) teacher have a Lead or Master designation," which gives EPPs flexibility to ensure teacher preparation aspiring teachers can be placed for a residency. This is extremely important for the Master of Arts in Teaching program. These aspiring teachers often take jobs and are the teacher of record on a provisional license, therefore, the EPP does not have control over the placement. There will be no guarantee that a Lead or Master teacher will be in that school to serve as an experienced master teacher.
- In the section related to the experienced mentor teacher the word preferred should be kept. The sentence "it is preferred that the (*experienced mentor*) teacher have a Lead or Master designation," allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.
- Requiring all aspiring teachers to be placed with an "experienced mentor teacher" places an extraordinary burden on practicing teachers and schools to require teachers to go through the Lead or Master designation process that is costly and prohibitive. Without a teacher with Lead or Master designation a school would not be allowed to have an aspiring teacher.
- "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

## Coaching training

- "*Experienced Mentor Teacher*" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.
- "*One Year Supervised Residency*" means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

## Definition of Completer

There is a conflict in definitions between these proposed rules and Federal definition for Title II completer.

- Page 8 Definitions 1-2.28 - “Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.
- Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer.  
<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

## SPED 101 Academy

- Page 11 1-2.50 “SPED 101 Academy” means a ~~three (3)~~ six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.
- Regarding the doubling of credit hours for SPED 101 Academy from 3-6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.
  - SUGGESTION: Please keep SPED 101 Academy as a three (3) credit hour course.

## Provisional License

On Page 17. *2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:*

*2-3.02.1 A completed application form for the Provisional License and*

*2-3.02.2 One of the following:*

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or

2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division; (Should this point be 2-3.02.2.1.1 to clarify how transcripts for out-of-country candidates are reviewed rather than an option for “One of the following:”?)

- DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.
- Where is the MAT program in 2-3.02?
- This section also does not indicate that completion or enrollment in an EPP is required for a provisional license.

**Licensure Options for Traditional Programs**

<p>EVERYONE:  <b>Complete</b> a degree with an embedded DESE approved <b>educator preparation program</b> that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	<b>Standard licensure</b>	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	<b>Receive a provisional license</b> and meet <a href="#">AAP requirements</a>	<b>Standard licensure</b>
	Option 3	Passing score on a DESE approved <a href="#">performance based</a> assessment during internship (nationally scored)	<b>Standard licensure</b>	
	Option 4	Test attempt (no pass)	<b>Receive a provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following: <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <a href="#">performance based</a> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	<b>Standard Licensure</b>

Licensure Options Alternative Route Programs

FOR PROVISIONAL		FOR STANDARD	
EVERYONE: Admission into Arkansas educator preparation program (Must have a bachelor's or higher)	Option 1	Passing content assessment	Complete approved educator prep program
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Complete approved educator prep program  Meet <a href="#">AAP requirements</a>
	Option 3	Degree in content or Degree with 18 hrs in the content area AND with GPA of 3.0 in content area coursework	Complete approved educator prep program  Pass a DESE approved <a href="#">performance based assessment</a> (nationally scored, encourage embedding in EPP internship) AND effective summative evaluation under TESS  <b>OR</b>  Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data AND an effective summative evaluation under TESS

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

- SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.
- SUGGESTION: Please revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

Accreditation

1-2.05 Accredited Approved Educator Preparation Program

- Language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

1-2.45 Program of Study

- Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator’s license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

#### 2-6.02.16.12

- Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

- SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: *“One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters.* The ADE Protocol for one-year residency was developed before the residency rules were approved. *(See link below)*

- <https://drive.google.com/file/d/1ZShvrDhjbvXICjHhybOIs5Gbjmgu6xfE/view?pli=1>
- The ADE protocol states: *“A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.*

- This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.
  - SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

Commenter Name: Dr. Deborah Dailey; June 5, 2024

Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As a professor of teacher education, I respectfully submit my comments and suggestions for modification. I express my support for a year-long aspiring teacher residency and believe these suggestions will strengthen the residency requirement while allowing flexibility in implementation. A well-designed residency program is crucial for preparing high-quality teachers and ultimately benefits students.

Sincerely,  
Dr. Deborah Dailey

Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the “finalized rules.” As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

1-2.32 Required Coaching Training for Mentor Teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day “ADE recommended” coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position. School districts aren’t always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers. Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

#### 1-2.32 Preferred for Lead or Master designation for mentor teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation,” allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### 1-2.27 Definition of Completer Conflict

There are differing definitions of “completer” creating a conflict between Federal definition for Title II completer and these rules’ definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state- approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

#### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

### 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

**Licensure Options for Traditional Programs**

<p>EVERYONE:  <b>Complete</b> a degree with an embedded DESE approved <b>educator preparation program</b> that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	Standard licensure	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Receive a <b>provisional license</b> and meet <a href="#">AAP requirements</a>	Standard licensure
	Option 3	Passing score on a DESE approved <b>performance based</b> assessment during internship (nationally scored)	Standard licensure	
	Option 4	Test attempt (no pass)	<p>Receive a <b>provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <b>performance based</b> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	Standard Licensure

**Licensure Options Alternative Route Programs**

FOR PROVISIONAL		FOR STANDARD	
<p>EVERYONE:  <b>Admission into Arkansas educator preparation program</b> (Must have a bachelor's or higher)</p>	Option 1	Passing content assessment	Complete approved educator prep program
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	<p>Complete approved educator prep program</p> <p>Meet <a href="#">AAP requirements</a></p>
	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	Complete approved educator prep program

SUGGESTION: Revise the rules to reflect the ADE approved options in the attached charts and make it clear that MAT candidates can work on a provisional license.

2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

## 1-2.05 Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

o This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrDhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Laura Langley, Adjunct Professor, School of Education, University of Arkansas at Little Rock; June 6, 2024

Comments: Thank you for the opportunity to provide this response.

#### Response to rules that aren't finalized

- Education Preparation Providers (EPPs) have been told by ADE staff that the rules we are commenting on are not the finalized rules. Therefore, there are changes that we won't get the opportunity to address in public comment. This seems inconsistent with the intent of the public comment process.
  - SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

#### Requirement for Lead or Master designation for mentor teachers

- These rules state, "It is preferred that the (*experienced mentor*) teacher have a Lead or Master designation," which gives EPPs flexibility to ensure teacher preparation aspiring teachers can be placed for a residency. This is extremely important for the Master of Arts in Teaching program. These aspiring teachers often take jobs and are the teacher of record on a provisional license, therefore, the EPP does not have control over the placement. There will be no guarantee that a Lead or Master teacher will be in that school to serve as an experienced master teacher.
- In the section related to the experienced mentor teacher the word preferred should be kept. The sentence "it is preferred that the (*experienced mentor*) teacher have a Lead or Master designation," allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.
- Requiring all aspiring teachers to be placed with an "experienced mentor teacher" places an extraordinary burden on practicing teachers and schools to require teachers to go through the Lead or Master designation process that is costly and prohibitive. Without a teacher with Lead or Master designation a school would not be allowed to have an aspiring teacher.
- "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.
  - SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### Coaching training

- "*Experienced Mentor Teacher*" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.
- "*One Year Supervised Residency*" means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters.

- SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

### Definition of Completer

There is a conflict in definitions between these proposed rules and Federal definition for Title II completer.

- Page 8 Definitions 1-2.28 - “Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.
- Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>
- SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

### SPED 101 Academy

- Page 11 1-2.50 “SPED 101 Academy” means a ~~three (3)~~ six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.
- Regarding the doubling of credit hours for SPED 101 Academy from 3-6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.
- SUGGESTION: Please keep SPED 101 Academy as a three (3) credit hour course.

### Provisional License

On Page 17. 2-3.02 *The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:*

2-3.02.1 *A completed application form for the Provisional License and*

2-3.02.2 *One of the following:*

2-3.02.2.1 *Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or*

2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division; (Should this point be 2-3.02.2.1.1 to clarify how transcripts for out-of-country candidates are reviewed rather than an option for “One of the following:”?)

- DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.
- Where is the MAT program in 2-3.02?
- This section also does not indicate that completion or enrollment in an EPP is required for a provisional license.

**Licensure Options for Traditional Programs**

<p>EVERYONE:  <b>Complete</b> a degree with an embedded DESE approved <b>educator preparation program</b> that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	<b>Standard licensure</b>	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Receive a <b>provisional license</b> and meet <a href="#">AAP requirements</a>	<b>Standard licensure</b>
	Option 3	Passing score on a DESE approved <a href="#">performance based</a> assessment during internship (nationally scored)	<b>Standard licensure</b>	
	Option 4	Test attempt (no pass)	<p>Receive a <b>provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <a href="#">performance based</a> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	<b>Standard Licensure</b>

Licensure Options Alternative Route Programs

FOR PROVISIONAL		FOR STANDARD	
EVERYONE: Admission into Arkansas educator preparation program (Must have a bachelor's or higher)	Option 1	Passing content assessment	Complete approved educator prep program
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Complete approved educator prep program  Meet <a href="#">AAP requirements</a>
	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	Complete approved educator prep program  <b>OR</b>  Pass a DESE approved <a href="#">performance based assessment</a> (nationally scored, encourage embedding in EPP internship) <b>AND</b> effective summative evaluation under TESS  Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

- SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.
- SUGGESTION: Please revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

Accreditation

1-2.05 Accredited Approved Educator Preparation Program

- Language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

1-2.45 Program of Study

- Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator's license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

#### 2-6.02.16.12

- Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

- SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “*One Year Supervised Residency*” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

- <https://drive.google.com/file/d/1ZShvrdhjbxICjHhybOIs5Gbjmgu6xfE/view?pli=1>
- The ADE protocol states: “*A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.*”
- This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.
  - SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

Division Response: **Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Janet Filer; June 6, 2024

Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As an associate professor of teacher education, I respectfully submit my comments and suggestions for modification. I want to express my support for a year-long aspiring teacher residency and feel like these suggestions, listed below, will maintain the integrity of the residency requirement while allowing flexibility in implementation.

Sincerely,

Dr. Janet Filer

Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the "finalized rules." As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day "ADE recommended" coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position. School districts aren't always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers. Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

#### 1-2.32 Preferred for Lead or Master designation for mentor teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### 1-2.27 Definition of Completer Conflict

There are differing definitions of “completer” creating a conflict between Federal definition for Title II completer and these rules’ definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state- approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

#### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

## 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

**SUGGESTION:** Revise the rules to reflect the ADE approved options in the attached charts and make it clear that MAT candidates can work on a provisional license.

## 2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

**SUGGESTION:** Revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

## 1-2.05 Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

**SUGGESTION:** Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

## ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Steve Ward; June 6, 2024

Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As a clinical instructor of teacher education, I respectfully submit my comments and suggestions for modification. I want to express my support for a year-long aspiring teacher residency and feel like these suggestions, listed below, will maintain the integrity of the residency requirement while allowing flexibility in implementation.

Sincerely,

Mr. Steve Ward

Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the “finalized rules.” As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day “ADE recommended” coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position. School districts aren’t always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers.

Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

### 1-2.32 Preferred for Lead or Master destination for mentor teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

### 1-2.27 Definition of Completer Conflict

There are differing definitions of “completer” creating a conflict between Federal definition for Title II completer and these rules’ definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state- approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact

that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

### 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

SUGGESTION: Revise the rules to reflect the ADE approved options in the attached charts and make it clear that MAT candidates can work on a provisional license.

**Licensure Options for Traditional Programs**

<p>EVERYONE:  <b>Complete</b> a degree with an embedded DESE approved <b>educator preparation program</b> that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	Standard licensure	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Receive a <b>provisional license</b> and meet <a href="#">AAP requirements</a>	Standard licensure
	Option 3	Passing score on a DESE approved <b>performance based</b> assessment during internship (nationally scored)	Standard licensure	
	Option 4	Test attempt (no pass)	<p>Receive a <b>provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following:</p> <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <b>performance based</b> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	Standard Licensure

**Licensure Options Alternative Route Programs**

FOR PROVISIONAL		FOR STANDARD	
<p>EVERYONE:  <b>Admission into Arkansas educator preparation program</b> (Must have a bachelor's or higher)</p>	Option 1	Passing content assessment	Complete approved educator prep program
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	<p>Complete approved educator prep program</p> <p>Meet <a href="#">AAP requirements</a></p>
	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	<p>Complete approved educator prep program</p> <p>Pass a DESE approved <b>performance based</b> assessment (nationally scored, encourage embedding in EPP internship) <b>AND</b> effective summative evaluation under TESS</p> <p><b>OR</b></p> <p>Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</p>

2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

1-2.05 Accreditation

1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrDhjbvXICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Charlotte Wheelless, Professor of Education, Williams Baptist University; June 7, 2024

#### Comments:

Please see the comments below regarding the DESE Rules Governing Educator Licensure. Thank you for your consideration.

### Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current university sophomores, who entered under a catalog stating that they would have to complete a one-semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

Page 8 of the rules, 1-2.28, changes the current definition of an EPP Completer. The new definition conflicts with the definition of a completer in the Title II Glossary, which will conflict with the Federal Title II reporting required by every EPP.

The definition of an EPP Completer also places a hardship on teacher candidates in AR who cannot pass licensure exams the first time, preventing them from completing their degree and entering the workforce. See Details Below

#### Definition of Completer

There is a conflict in definitions between these proposed rules and Federal definition for Title II completer.

Page 8 - Definitions 1-2.28 - "Educator Preparation Program Completer" means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator's provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP's catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program's requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

#### SUGGESTION:

Make the definition for completer consistent with the Federal Title II definition.

### Page 5, 1-2.05 Accredited Approved Educator Preparation Program

#### 1-2.05 Accredited Approved Educator Preparation Program

The language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation like HLC but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP is currently an option EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Page 10, 1-2.45 Definition of a Program of Study.

#### 1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator's license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Page 27, 2-6.02.16.2

Language here states that a standard license requires "Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education."

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

**SUGGESTION:** Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

Page 9, 1-2.38 One-Year Supervised Residency  
ADE Protocol for Teacher Preparation

The rules state: "One Year Supervised Residency" means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states:

“A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

Page 8, 1-2.32 Experience Mentor Teacher

In the section related to the experienced mentor teacher, the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation" allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation. Requiring all aspiring teachers to be placed with an "experienced mentor teacher" places an extraordinary burden on schools an Educator Preparation Providers. Without a teacher with a Lead or Master designation, a school would not be allowed to have an aspiring teacher. Many small districts in AR have no teachers with a lead or master designation.

SUGGESTION: Keep the Lead or Master designation as preferred for the experienced mentor teacher, not required.

Page 17. 2-3.02

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meeting AAP scores. Where are the MAT programs in 2-3.02?

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

**Division Response: Comments considered. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

Commenter Name: Laura Wooldridge; June 8, 2024

Comments:

Please see the comments below regarding the DESE Rules Governing Educator Licensure. Thank you for your consideration.

Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current university sophomores, who entered under a catalog stating that they would have to complete a one- semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

Page 8 of the rules, 1-2.28, changes the current definition of an EPP Completer. The new definition conflicts with the definition of a completer in the Title II Glossary, which will conflict with the Federal Title II reporting required by every EPP.

The definition of an EPP Completer also places a hardship on teacher candidates in AR who cannot pass licensure exams the first time, preventing them from completing their degree and entering the workforce.

See Details Below

Definition of Completer

There is a conflict in definitions between these proposed rules and the Federal definition for Title II completer.

Page 8 Definitions 1-2.28 - "Educator Preparation Program Completer" means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator's provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP's catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are

documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program's requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

Page 5, 1-2.05 Accredited Approved Educator Preparation Program

1-2.05 Accredited Approved Educator Preparation Program

The language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation like HLC but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP is currently an option EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Page 10, 1-2.45 Definition of a Program of Study.

1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator's license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Page 27, 2-6.02.16.2

Language here states that a standard license requires "Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education."

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects

with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

Page 9, 1-2.38 One-Year Supervised Residency

ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

Page 8, 1-2.32 Experience Mentor Teacher

In the section related to the experienced mentor teacher, the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation” allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.

Requiring all aspiring teachers to be placed with an “experienced mentor teacher” places an extraordinary burden on schools and Educator Preparation Providers. Without a teacher with a Lead or Master designation, a school would not be allowed to have an aspiring teacher. Many small districts in AR have no teachers with a lead or master designation.

SUGGESTION: Keep the Lead or Master designation as preferred for the experienced mentor teacher, not required.

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meeting AAP scores.

Where are the MAT programs in 2-3.02?

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

Thank you for your time. Please, please remember the residency model is a huge elephant to take on for all university programs, but even bigger for smaller universities which do not have a large number of faculty members.

Sincerely,

Laura Wooldridge

**Division Response: Comments considered. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

Commenter Name: Dr. Neelie Dobbins, Chair, Teacher Education, SAU Magnolia; June 8, 2024

Comments: Good morning!

Response to rules that aren't finalized

Education Preparation Providers (EPPs) have been told by ADE staff that the rules we are commenting on are not the finalized rules. Therefore, there are changes that we won't get the opportunity to address in public comment. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

Requirement for Lead or Master designation for mentor teachers

These rules state, "It is preferred that the (experienced mentor) teacher have a Lead or Master designation," which gives EPPs flexibility to ensure teacher preparation aspiring teachers can be

placed for a residency. This is extremely important for the Master of Arts in Teaching program. These aspiring teachers often take jobs and are the teacher of record on a provisional license, therefore, the EPP does not have control over the placement. There will be no guarantee that a Lead or Master teacher will be in that school to serve as an experienced master teacher.

In the section related to the experienced mentor teacher the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.

Requiring all aspiring teachers to be placed with an "experienced mentor teacher" places an extraordinary burden on practicing teachers and schools to require teachers to go through the Lead or Master designation process that is costly and prohibitive. Without a teacher with Lead or Master designation a school would not be allowed to have an aspiring teacher.

"Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### Coaching training

"Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

"One Year Supervised Residency" means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

#### Definition of Completer

There is a conflict in definitions between these proposed rules and Federal definition for Title II completer.

Page 8 Definitions 1-2.28 - "Educator Preparation Program Completer" means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator's provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP's catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program's requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

### SPED 101 Academy

Page 11 1-2.50 "SPED 101 Academy" means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3-6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

SUGGESTION: Please keep SPED 101 Academy as a three (3) credit hour course. If the 6 hours refers for professional development hours we recommend specifying that in the rules to distinguish 6 PD hours from a 3 credit course provided by an EPP.

### Provisional License

On Page 17. 2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or

2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division; (Should this point be 2-

3.02.2.1.1 to clarify how transcripts for out-of-country candidates are reviewed rather than an option for "One of the following:?"?)

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

Where is the MAT program in 2-3.02?

This section also does not indicate that completion or enrollment in an EPP is required for a provisional license.

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

SUGGESTION: Please revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

## Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator's license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be

obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

2-6.02.16.12

Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxCjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall. This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Trent Broussard, Williams Baptist University; June 8, 2024

Comments:

Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current university sophomores, who entered under a catalog stating that they would have to complete a one- semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

Page 8 of the rules, 1-2.28, changes the current definition of an EPP Completer. The new definition conflicts with the definition of a completer in the Title II Glossary, which will conflict with the Federal Title II reporting required by every EPP.

The definition of an EPP Completer also places a hardship on teacher candidates in AR who cannot pass licensure exams the first time, preventing them from completing their degree and entering the workforce.

See Details Below

Definition of Completer

There is a conflict in definitions between these proposed rules and the Federal definition for Title II completer.

Page 8 Definitions 1-2.28 - “Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

Page 5, 1-2.05 Accredited Approved Educator Preparation Program

1-2.05 Accredited Approved Educator Preparation Program

The language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation like HLC but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP is currently an option EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Page 10, 1-2.45 Definition of a Program of Study.

1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator’s license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### Page 9, 1-2.38 One-Year Supervised Residency

##### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

#### Page 8, 1-2.32 Experience Mentor Teacher

In the section related to the experienced mentor teacher, the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master

designation” allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.

Requiring all aspiring teachers to be placed with an “experienced mentor teacher” places an extraordinary burden on schools and Educator Preparation Providers. Without a teacher with a Lead or Master designation, a school would not be allowed to have an aspiring teacher. Many small districts in AR have no teachers with a lead or master designation.

SUGGESTION: Keep the Lead or Master designation as preferred for the experienced mentor teacher, not required.

Page 17. 2-3.02

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meeting AAP scores.

Where are the MAT programs in 2-3.02?

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

**Division Response: Comments considered. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

Commenter Name: Dr. Donna Wake; June 9, 2024

Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As a professor of teacher education, I respectfully submit my comments and suggestions for modification. I want to express my support for a year-long aspiring teacher residency and feel like these suggestions, listed below, will maintain the integrity of the residency requirement while allowing flexibility in implementation.

Sincerely,  
Dr. Donna Wake

Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the “finalized rules.” As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day “ADE recommended” coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position.

School districts aren’t always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers.

Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

### 1-2.32 Preferred for Lead or Master designation for mentor teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

The word preferred should be kept. The sentence “it is preferred that the (experienced mentor) teacher have a Lead or Master designation,” allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

### 1-2.27 Definition of Completer Conflict

There are differing definitions of “completer” creating a conflict between Federal definition for Title II completer and these rules’ definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

### 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and

2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

**Licensure Options for Traditional Programs**

<p>EVERYONE:  <b>Complete</b> a degree with an embedded DESE approved <b>educator preparation program</b> that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	<b>Standard licensure</b>	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	<b>Receive a provisional license</b> and meet <a href="#">AAP requirements</a>	<b>Standard licensure</b>
	Option 3	Passing score on a DESE approved <a href="#">performance based</a> assessment during internship (nationally scored)	<b>Standard licensure</b>	
	Option 4	Test attempt (no pass)	<b>Receive a provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following: <ul style="list-style-type: none"> <li>a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS</li> <li>b. Pass a <a href="#">performance based</a> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS</li> </ul>	<b>Standard Licensure</b>

Licensure Options Alternative Route Programs

FOR PROVISIONAL		FOR STANDARD	
EVERYONE: Admission into Arkansas educator preparation program (Must have a bachelor's or higher)	Option 1	Passing content assessment	Complete approved educator prep program
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Complete approved educator prep program  Meet <a href="#">AAP requirements</a>
	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	Complete approved educator prep program  Pass a DESE approved <u>performance based</u> assessment (nationally scored, encourage embedding in EPP internship) <b>AND</b> effective summative evaluation under TESS  <b>OR</b>  Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS

SUGGESTION: Revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

1-2.05 Accreditation

1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Jodi Waters, Site Coordinator, SAU Magnolia; June 9, 2024

Comments: Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the "finalized rules." As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

#### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day "ADE recommended" coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position.

School districts aren't always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers.

Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

#### 1-2.32 Preferred for Lead or Master designation for mentor teachers

The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### 1-2.27 Definition of Completer Conflict

There are differing definitions of "completer" creating a conflict between Federal definition for Title II completer and these rules' definition of completer, which will cause confusion.

"Educator Preparation Program Completer" means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator's provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP's catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

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SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

#### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

## 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and

2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

SUGGESTION: Revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

## 2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

## 1-2.05 Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

#### Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current university sophomores, who entered under a catalog stating that they would have to complete a one- semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Ann Robinson, Professor and Director, University of Arkansas at Little Rock; June 10, 2024

Comments: The following is written in response to the call for public comment on the [DESE Proposed Rule Governing Educator Licensure](#).

Public Comment closes June 10th

Public Comment Contact Email: ADE.RulesComments@ade.arkansas.gov

Thank you for the opportunity to provide this response.

Response to rules that aren't finalized

Education Preparation Providers (EPPs) have been told by ADE staff that the rules we are commenting on are not the finalized rules. Therefore, there are changes that we won't get the opportunity to address in public comment. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

Requirement for Lead or Master designation for mentor teachers

These rules state, "It is preferred that the (experienced mentor) teacher have a Lead or Master designation," which gives EPPs flexibility to ensure teacher preparation aspiring teachers can be placed for a residency. This is extremely important for the Master of Arts in Teaching program. These aspiring teachers often take jobs and are the teacher of record on a provisional license, therefore, the EPP does not have control over the placement. There will be no guarantee that a Lead or Master teacher will be in that school to serve as an experienced master teacher.

In the section related to the experienced mentor teacher the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.

Requiring all aspiring teachers to be placed with an “experienced mentor teacher” places an extraordinary burden on practicing teachers and schools to require teachers to go through the Lead or Master designation process that is costly and prohibitive. Without a teacher with Lead or Master designation a school would not be allowed to have an aspiring teacher.

“Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### Coaching training

“Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

“One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

#### Definition of Completer

There is a conflict in definitions between these proposed rules and Federal definition for Title II completer.

Page 8 Definitions 1-2.28 - “Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

## SPED 101 Academy

Page 11 1-2.50 “SPED 101 Academy” means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3-6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

SUGGESTION: Please keep SPED 101 Academy as a three (3) credit hour course.

## Provisional License

On Page 17. 2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and

2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or

2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division; (Should this point be 2-3.02.2.1.1 to clarify how transcripts for out-of-country candidates are reviewed rather than an option for “One of the following:”?)

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

Where is the MAT program in 2-3.02?

This section also does not indicate that completion or enrollment in an EPP is required for a provisional license.

**Licensure Options for Traditional Programs**

<p>EVERYONE:  <b>Complete</b> a degree with an embedded DESE approved <b>educator preparation program</b> that includes an internship in the area in which you are seeking licensure</p>	Option 1	Passing content assessment	<b>Standard licensure</b>	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	<b>Receive a provisional license</b> and meet <a href="#">AAP requirements</a>	<b>Standard licensure</b>
	Option 3	Passing score on a DESE approved <u>performance based</u> assessment during internship (nationally scored)	<b>Standard licensure</b>	
	Option 4	Test attempt (no pass)	<b>Receive a provisional license</b> in the area in which the candidate was prepared and complete <b>ONE</b> of the following: a. Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS b. Pass a <u>performance based</u> assessment supported by employing district (Nationally Scored) <b>AND</b> an effective summative evaluation under TESS	<b>Standard Licensure</b>

**Licensure Options Alternative Route Programs**

	FOR PROVISIONAL		FOR STANDARD	
<p>EVERYONE:  <b>Admission into Arkansas educator preparation program</b> (Must have a bachelor's or higher)</p>	Option 1	Passing content assessment	Complete approved educator prep program	
	Option 2	Meet <a href="#">Alternate Assessment Plan (AAP) score</a>	Complete approved educator prep program	Meet <a href="#">AAP requirements</a>
	Option 3	Degree in content or Degree with 18 hrs in the content area <b>AND</b> with GPA of 3.0 in content area coursework	Complete approved educator prep program	Pass a DESE approved <u>performance based</u> assessment (nationally scored, encourage embedding in EPP internship) <b>AND</b> effective summative evaluation under TESS  <b>OR</b>  Demonstration of student growth according to a value-added growth model score calculated by DESE using minimum of three years of data <b>AND</b> an effective summative evaluation under TESS

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the

requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

SUGGESTION: Please revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

## Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator's license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 2-6.02.16.12

Language here states that a standard license requires "Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education."

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects

with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

Commenter Name: Dr. Suzanne Kucharczyk, Interim Department Head of Curriculum and Instruction, Associate Professor of Special Education, University of Arkansas; June 10, 2024

Comments: Response to rules that aren't finalized

Teacher Preparation Programs have been told that the rules currently under review are not the "finalized rules." As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day "ADE recommended" coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position.

School districts aren't always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers.

Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

### 1-2.32 Preferred for Lead or Master designation for mentor teachers

The rules state: "Experienced Mentor Teacher" means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation."

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### 1-2.27 Definition of Completer Conflict

There are differing definitions of “completer” creating a conflict between Federal definition for Title II completer and these rules’ definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

#### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

#### 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still

qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and

2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

SUGGESTION: Revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licensees must achieve a standard license in three years.

1-2.05 Accreditation

1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, "the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government."

This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

## ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

### Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current university sophomores, who entered under a catalog stating that they would have to complete a one- semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive**

**Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Todd Abel; June 10, 2024

Comments:

Greetings -

As a professor of mathematics specializing in mathematics teacher preparation, I'd like to submit the following comments and suggestions. While the year-long residency will offer some significant benefits to our teacher candidates, I believe that the suggestions below will allow those benefits to be realized while allowing flexibility in implementation that will prove beneficial to teacher candidates.

First, since these are not listed as the finalized rules, stakeholders should have the opportunity to review and respond the "finalized" rules when those are proposed after this public comment period. Doing so will allow for collaboration with teacher preparation programs, in particular.

1-2.05 Accreditation

The language here makes it confusing how EPP accreditation through CAEP or AAQEP might intersect with state review. This should be clarified.

1-2.32 Required Coaching for Mentor Teachers

It is unrealistic that the large number of mentor teachers who supervise teacher candidates can complete the coaching training within the next year or two. The mechanisms are not in place for many districts to permit this during the school year, and it places an undue burden on teachers, districts, and programs. It is suggested that coaching training is preferred, but not required, for the experienced mentor teacher.

1-2.27 Definition of Completer

The definition of "completer" proposed here is in conflict with the federal Title II definition. These should be made consistent.

1-2.50 SPED 101 Academy

Doubling the number of credit hours for this course will require the elimination of other essential coursework, without a well-defined benefit. This should be kept as a 3 credit hour course.

2-3.0 Provisional License options

There appear to be options for provisional license presented by DESE that are not listed in these rules. In particular, admission to an MAT program with a passing PRAXIS score has been listed as an option and should be included.

#### 2-2.04 Provisional License Extension

The rule here would allow a candidate to teach for up to 6 years before earning a standard license. This is an untenable situation given the extensive data that indicates lower effectiveness for teachers on provisional licenses, and should be revised to ensure that provisional licensees achieve a standard license in three years.

#### ADE Protocol for Teacher Preparation

The rules refer to a one year supervised residency. ADE developed a protocol for this that calls for a minimum of 3 days per week for one semester and a minimum of 4 days per week for the second semester (270 hours first semester and 360 second). This limits flexibility for teacher preparation programs, particularly secondary programs that require content courses during the final year. In some cases, it will require reducing the content experience for teacher candidates. In addition, many partner districts have moved to 4 day weeks, which is incompatible with the university course schedule for a 3 day per week internship. If the protocol was adjusted to allow a total of 630 hours for the year, it would allow programs flexibility to move to a 2 days per week/5 days per week schedule in programs where this would be more beneficial, or to partner with districts to create internship schedules that are mutually beneficial but may not exactly fit the current proposed guidelines.

Thank you for your time and attention - Todd Abel

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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**Commenter Name:** Mike Mertens, Assistant Executive Director, AAEEA; June 10, 2024

#### Comments:

Section: 2-4.03 - The applicant shall training in pedagogy as determined by the Division.

Suggested Change: The applicant shall (receive or complete) training in pedagogy as determined by the Division.

Section: 5-2.04 - Every standard Arkansas educator’s license will be renewed with an Educator Career Continuum designation for which the applicant qualifies under Section 4-12.

Concern: The language of Section 4-12 describing the Educator Career Continuum is stricken in the proposed rules.

**Division Response: Comments considered. Non-substantive change made to Section 2-4.03. Educator Career Continuum has been moved to Section 6 of the rules. No other changes made.**

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Commenter Name: Jana Hoffpauir, Assistant Professor of Education, Williams Baptist University; June 10, 2024

Comments: Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current university sophomores, who entered under a catalog stating that they would have to complete a one- semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

Page 8 of the rules, 1-2.28, changes the current definition of an EPP Completer. The new definition conflicts with the definition of a completer in the Title II Glossary, which will conflict with the Federal Title II reporting required by every EPP.

The definition of an EPP Completer also places a hardship on teacher candidates in AR who cannot pass licensure exams the first time, preventing them from completing their degree and entering the workforce.

See Details Below

Definition of Completer

There is a conflict in definitions between these proposed rules and the Federal definition for Title II completer.

Page 8 Definitions 1-2.28 - “Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in

conflict with Title II reporting requirements if the EPP's catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program's requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

Page 5, 1-2.05 Accredited Approved Educator Preparation Program

1-2.05 Accredited Approved Educator Preparation Program

The language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation like HLC but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP is currently an option EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Page 10, 1-2.45 Definition of a Program of Study.

1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator's license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Page 27, 2-6.02.16.2

Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### Page 9, 1-2.38 One-Year Supervised Residency

##### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxCjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

#### Page 8, 1-2.32 Experience Mentor Teacher

In the section related to the experienced mentor teacher, the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation” allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.

Requiring all aspiring teachers to be placed with an “experienced mentor teacher” places an extraordinary burden on schools and Educator Preparation Providers. Without a teacher with a Lead or Master designation, a school would not be allowed to have an aspiring teacher. Many small districts in AR have no teachers with a lead or master designation.

SUGGESTION: Keep the Lead or Master designation as preferred for the experienced mentor teacher, not required.

Page 17. 2-3.02

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meeting AAP scores.

Where are the MAT programs in 2-3.02?

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

**Division Response: Comments considered. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Arkansas Public School Resource Center; June 10, 2024

Comments:

- 1.) Section 1-2.38, Page 9: Is "One-Year Supervised Residency" the new term for having a mentor? The Section does not list any specifics as to what that residency or requirements are to "pass" for licensure.
- 2.) Section 2-2.01, Page 15: The list of ancillary licensure areas on the website are not easily found since "Appendix A" is now "Required Professional Development".
- 3.) Section 2-3.03, Page 18: This section references Section 4-5.0, which is being removed.
- 4.) Section 2-9.2.1, Page 33: The "Possible Caseload Increase" for a Special Education Journeyman seems unreasonable. The Journeyman will already be "mentoring" an apprentice, which is additional work; increasing his/her caseload could become overwhelming to the Journeyman.
- 5.) Section 4-2.02, Page 69: The subsections to this section are misnumbered {"4-4.02.1", etc.).

- 6.) Section 5-2.04, Page 71: This section references Section 4-12, which is being removed.
- 7.) Section 6-5.02, Page 85: This section references Section 3-4.02, which is being removed.
- 8.) Section 6-5.03, Page 85: This section references Section 4-11.06.3, which is being removed.
- 9.) "Appendix A", Page 97: The current "Appendix A" is being removed, and being changed to "Required Professional Development". The current "Appendix A" should not be removed, as it is a good reference. The "Required Professional Development" document can become "Appendix B" and also be included in the current "Appendix A" document.

**Division Response: Comments considered. The one-year residency is an extended internship and is not a substitute for content-specific assessments. The registered apprentice will assume additional responsibility for the journeyman’s caseload. Non-substantive changes made to Section 2-3.03, Section 4-2.02, Section 5-2.04, Section 6-5.02, and Section 6-5.03. No other changes were made.**

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Commenter Name: Dr. H.R. Anderson; June 10, 2024

Comments:

Thank you for the opportunity to respond to the proposed DESE Rules Governing Educator Licensure. As a professor who directs pre-service teachers, I respectfully submit my comments and suggestions for modification. I support a year-long aspiring teacher residency. These suggestions, listed below, maintain the integrity of the residency requirement while allowing flexibility in its implementation.

Sincerely,  
Dr. H.R. Anderson

Teacher Preparation Programs have been told that the rules currently under review are not the “finalized rules.” As a result, there will be changes that we will not have the opportunity to address during the public comment period. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

### 1-2.32 Required Coaching Training for Mentor Teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

Given the large number of mentor teachers who have student teachers/interns in their classrooms and the number of university supervisors, it is unrealistic to expect everyone can complete a two day “ADE recommended” coaching training within a year, or even two years. This requirement places an undue burden on K-12 schools, mentor teachers, and EPPs. It also impacts the Masters of Arts in Teaching programs where aspiring teachers secure jobs without input from universities. This situation makes it impossible to ensure that a qualified, experienced mentor teacher is in the school where an MAT candidate has taken a position.

School districts aren’t always willing to let teachers out of the classroom to attend a two-day training unrelated to their K-12 teaching jobs. This limits the number of mentor teachers who will be qualified as experienced mentor teachers.

Finding residency placements for aspiring teachers with this requirement will be hard.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

#### 1-2.32 Preferred for Lead or Master designation for mentor teachers

The rules state: “Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.”

The word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation," allows flexibility as schools and universities work to get practicing teachers through the Lead or Master teacher designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### 1-2.27 Definition of Completer Conflict

There are differing definitions of “completer” creating a conflict between Federal definition for Title II completer and these rules’ definition of completer, which will cause confusion.

“Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree,

institutional certificate, program credential, transcript or other written proof of having met the program's requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

### 1-2.50 SPED 101 Academy

SPED 101 Academy means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3 to 6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

<https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Keep SPED 101 Academy as a three (3) credit hour course.

### 2-3.0 Provisional License Confusion

DESE has presented other choices for a provisional license (see charts below) that are not listed in these rules. For example, does enrollment in an MAT program with passing Praxis scores still qualify for a provisional license? These options appear missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and

2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor's degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or 2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division;

SUGGESTION: Revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

## 2-3.04 Provisional License Extension

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

## 1-2.05 Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Rules state that to be accredited, “the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.”

This language is not focused on university (IHE) accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

## ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Kim Level, Dean/Assistant Professor, University of Arkansas at Monticello; June 10, 2024

Comments: Education Preparation Providers (EPPs) have been told by ADE staff that the rules we are commenting on are not the finalized rules. Therefore, there are changes that we won't get the opportunity to address in public comment. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

Requirement for Lead or Master designation for mentor teachers

These rules state, "It is preferred that the (experienced mentor) teacher have a Lead or Master designation," which gives EPPs flexibility to ensure teacher preparation aspiring teachers can be placed for a residency. This is extremely important for the Master of Arts in Teaching program. These aspiring teachers often take jobs and are the teacher of record on a provisional license, therefore, the EPP does not have control over the placement. There will be no guarantee that a Lead or Master teacher will be in that school to serve as an experienced master teacher.

In the section related to the experienced mentor teacher the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master

designation,” allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.

Requiring all aspiring teachers to be placed with an “experienced mentor teacher” places an extraordinary burden on practicing teachers and schools to require teachers to go through the Lead or Master designation process that is costly and prohibitive. Without a teacher with Lead or Master designation a school would not be allowed to have an aspiring teacher.

“Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### Coaching training

“Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

“One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters.

SUGGESTION: Indicate that coaching training is preferred, not required, for the experienced mentor teacher.

#### Definition of Completer

There is a conflict in definitions between these proposed rules and Federal definition for Title II completer.

Page 8 Definitions 1-2.28 - “Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not

been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

## SPED 101 Academy

Page 11 1-2.50 “SPED 101 Academy” means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3-6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

SUGGESTION: Please keep SPED 101 Academy as a three (3) credit hour course. If the 6 hours refers for professional development hours we recommend specifying that in the rules to distinguish 6 PD hours from a 3 credit course provided by an EPP.

## Provisional License

On Page 17. 2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or

2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division; (Should this point be 2-

3.02.2.1.1 to clarify how transcripts for out-of-country candidates are reviewed rather than an option for “One of the following:”?)

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

Where is the MAT program in 2-3.02?

This section also does not indicate that completion or enrollment in an EPP is required for a provisional license.

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

SUGGESTION: Please revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

## Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator's license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 2-6.02.16.12

Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall. This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

#### Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current

university sophomores, who entered under a catalog stating that they would have to complete a one- semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Dr. Judy Hubbell, University of Arkansas at Monticello; June 10, 2024

Comments: Education Preparation Providers (EPPs) have been told by ADE staff that the rules we are commenting on are not the finalized rules. Therefore, there are changes that we won't get the opportunity to address in public comment. This seems inconsistent with the intent of the public comment process.

SUGGESTION: We respectfully request that all stakeholders be given the opportunity to review the finalized rules and be given an opportunity to respond to those rules.

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These rules state, "It is preferred that the (experienced mentor) teacher have a Lead or Master designation," which gives EPPs flexibility to ensure teacher preparation aspiring teachers can be placed for a residency. This is extremely important for the Master of Arts in Teaching program. These aspiring teachers often take jobs and are the teacher of record on a provisional license, therefore, the EPP does not have control over the placement. There will be no guarantee that a Lead or Master teacher will be in that school to serve as an experienced master teacher.

In the section related to the experienced mentor teacher the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master

designation,” allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.

Requiring all aspiring teachers to be placed with an “experienced mentor teacher” places an extraordinary burden on practicing teachers and schools to require teachers to go through the Lead or Master designation process that is costly and prohibitive. Without a teacher with Lead or Master designation a school would not be allowed to have an aspiring teacher.

“Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

SUGGESTION: Keep Lead or Master designation as preferred for the experienced mentor teacher.

#### Coaching training

“Experienced Mentor Teacher” means a teacher with a minimum of three years of teaching experience, has a summative evaluation with an effective rating or higher, and has received mentor coaching training. It is preferred that the teacher have a Lead or Master designation.

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been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

## SPED 101 Academy

Page 11 1-2.50 “SPED 101 Academy” means a three (3) six (6) credit hour course developed by institutions of higher education based on competencies developed in collaboration with the Division Educator Preparation Unit, Special Education Unit, and public school districts, public charter schools, and education service cooperatives.

Regarding the doubling of credit hours for SPED 101 Academy from 3-6: Special Education coursework is already very limited in flexibility given the breadth and scope of competencies covered in initial and endorsement programs of study. Adding 3 hours will require programs to eliminate necessary coursework and tighten opportunities to address critical competencies.

SUGGESTION: Please keep SPED 101 Academy as a three (3) credit hour course. If the 6 hours refers for professional development hours we recommend specifying that in the rules to distinguish 6 PD hours from a 3 credit course provided by an EPP.

## Provisional License

On Page 17. 2-3.02 The Division shall issue a Provisional License for up to three (3) years to an applicant upon submission of the following:

2-3.02.1 A completed application form for the Provisional License and 2-3.02.2 One of the following:

2-3.02.2.1 Official transcript(s) documenting eighteen credit (18) hours in the specific content area with content GPA of 3.00 or higher on an awarded four-year college bachelor’s degree or higher from an institution of higher education that is regionally or nationally accredited by an accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation; or

2-3.02.2.2 For out-of-country candidates, an official college transcript evaluation from a private credential evaluation agency recognized by the Division; (Should this point be 2-

3.02.2.1.1 to clarify how transcripts for out-of-country candidates are reviewed rather than an option for “One of the following:”?)

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meets AAP scores.

Where is the MAT program in 2-3.02?

This section also does not indicate that completion or enrollment in an EPP is required for a provisional license.

2-3.04 A provisional license may be extended for up to three (3) years after the applicant completes an educator preparation program if the applicant is working to meet the requirements for a standard license. A candidate could teach for up to 6 years before earning a standard license.

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

SUGGESTION: Please revise the rules to ensure that candidates on provisional licenses must achieve a standard license in three years.

## Accreditation

### 1-2.05 Accredited Approved Educator Preparation Program

Language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation, but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP are options EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator's license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

### 2-6.02.16.12

Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

#### ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbvxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall. This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

#### Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current

university sophomores, who entered under a catalog stating that they would have to complete a one- semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

**Division Response: Comments considered. Non-substantive changes were made to the following section: Section 1-2.50 amended the definition of SPED 101 Academy. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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Commenter Name: Taylor Hoskins, Assistant Professor of Education, Williams Baptist University; June 10, 2024

Comments: Page 37, 3-1.03.4.1 Timeline for One-Year Supervised Residency

The timeline for the one-year residency listed in the pending rules as "May 2027 and thereafter" is unrealistic for Educator Preparation Providers to meet. This timeline would require that current university sophomores, who entered under a catalog stating that they would have to complete a one- semester internship, will have a change in the catalog during their degree programs. Universities would need to scramble to revise multiple education program degree plans, get those passed through academic affairs, and submit to DESE for program approval, which will take at least one academic year. This would put current sophomores finding out about this change during their junior year, which gives them no time to plan for a significant change to their degree program.

Suggestion: Set the timeline for a more realistic date of May 2029 to provide the necessary time for universities to revise degree plans, gain program approval, and revise catalogs to notify incoming freshmen in 2025-2026 that they must complete a one-year residency.

Page 8 of the rules, 1-2.28, changes the current definition of an EPP Completer. The new definition conflicts with the definition of a completer in the Title II Glossary, which will conflict with the Federal Title II reporting required by every EPP.

The definition of an EPP Completer also places a hardship on teacher candidates in AR who cannot pass licensure exams the first time, preventing them from completing their degree and entering the workforce.

See Details Below

#### Definition of Completer

There is a conflict in definitions between these proposed rules and the Federal definition for Title II completer.

Page 8 Definitions 1-2.28 - “Educator Preparation Program Completer” means a person who has completed all coursework/modules and program requirements of a state-approved program of study and is eligible for an Arkansas educator’s provisional or standard license. This may be in conflict with Title II reporting requirements if the EPP’s catalog does not require passing of all tests, required by the state for licensure, for completion of the degree.

Title II glossary: Program completer: A person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program’s requirements. In applying this definition, the fact that an individual has or has not been recommended to the state for initial certification or licensure may not be used as a criterion for determining who is a program completer. <https://title2.ed.gov/Public/TA/Glossary.pdf>

SUGGESTION: Make the definition for completer consistent with the Federal Title II definition.

#### Page 5, 1-2.05 Accredited Approved Educator Preparation Program

##### 1-2.05 Accredited Approved Educator Preparation Program

The language here states that to be accredited, the EPP must be reviewed by an accredited or accrediting organization recognized by the U.S. Department of Education or the Council for Higher Education Accreditation and approved by the licensing state government.

This language is not focused on IHE accreditation like HLC but on EPP accreditation. While accreditation through entities such as CAEP or AAQEP is currently an option EPPs may choose to pursue, it is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

#### Page 10, 1-2.45 Definition of a Program of Study.

##### 1-2.45 Program of Study

Language here states that a program of study is a curriculum that requires a candidate to demonstrate and document competency in the specific knowledge, skills, and dispositions for a particular endorsement to an educator’s license, a licensure content area, or level of licensure, and is: Provided by one (1) or more accredited colleges or universities, or an alternative educator

preparation program; Aligned with Arkansas Teaching Standards and the appropriate content knowledge and pedagogical competencies for the respective licensure areas; and Approved by the Division.

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

Page 27, 2-6.02.16.2

Language here states that a standard license requires “Successful completion of an educator preparation program that is nationally accredited by an accrediting organization recognized by the United States Department of Education, the Council for Higher Education.”

This language is not focused on IHE accreditation, but on EPP accreditation. Again, this language states that accreditation is required. In referencing 1-2.05, this accreditation would be obtained through entities such as CAEP or AAQEP. It is unclear how accreditation intersects with the new state review system. This language seems to imply that entities such as CAEP and AAQEP are still required, not just an option.

SUGGESTION: Please make it clear how accreditation intersects with the new state review and confirm that accreditation via entities such as CAEP and/or AAQEP is not required but remains an option.

Page 9, 1-2.38 One-Year Supervised Residency

ADE Protocol for Teacher Preparation

The rules state: “One Year Supervised Residency” means an experience in a school setting alongside an experienced mentor teacher not to exceed one academic year or two consecutive semesters. The ADE Protocol for one-year residency was developed before the residency rules were approved. (See link below)

<https://drive.google.com/file/d/1ZShvrdhjbxICjHhybOIs5Gbjmgu6xfE/view?pli=1>

The ADE protocol states: “A yearlong residency shall include a yearlong clinical placement for a minimum of 3 days (18 hours) per week in the first semester and 4 days (24 hours) per week in the second semester. Programs may also use a semester equivalent (270 hours in the first semester and 360 hours in the second semester) for licensure areas that do not follow a traditional weekly schedule. The residency must span two consecutive semesters; Fall to Spring or Spring to Fall.

This limits the flexibility of teacher preparation programs, especially for the secondary education programs that need higher level content classes (like math and science) during the first semester of residency. In addition, many districts are going to a 4-day school week, causing more issues with getting 3 days in during the first semester when college students are still taking education

classes. If the protocol was adjusted to allow a total of 630 hours for the year of residency, that would maintain the hour requirement and allow flexibility.

SUGGESTION: Please revise the ADE Protocol to allow a total of 630 hours for the year of residency. That would maintain the hour requirement and allow flexibility.

Page 8, 1-2.32 Experience Mentor Teacher

In the section related to the experienced mentor teacher, the word preferred should be kept. The sentence "it is preferred that the (experienced mentor) teacher have a Lead or Master designation" allows flexibility as schools and EPPs work to get practicing teachers through the Lead or Master teacher designation.

Requiring all aspiring teachers to be placed with an "experienced mentor teacher" places an extraordinary burden on schools and Educator Preparation Providers. Without a teacher with a Lead or Master designation, a school would not be allowed to have an aspiring teacher. Many small districts in AR have no teachers with a lead or master designation.

SUGGESTION: Keep the Lead or Master designation as preferred for the experienced mentor teacher, not required.

Page 17. 2-3.02

DESE has presented other choices for a provisional license (see charts below) that are not listed here. For example, does enrollment in an MAT program with passing Praxis scores qualify for a provisional license? It appears that these options are missing: Admission to an Arkansas EPP/MAT program with passing Praxis content assessments or meeting AAP scores.

Where are the MAT programs in 2-3.02?

SUGGESTION: Please revise the rules to reflect the ADE approved options in the charts above and make it clear that MAT candidates can work on a provisional license.

**Division Response: Comments considered. Executive Order 23-08 directs the Secretary of Education to implement a yearlong residency alongside an experienced mentor. The protocols already provide flexibility to allow participants to plan their academic schedules on a per semester basis. Appendix B (Licensure Pathways Chart) was added to the rules. Lead or master designations are necessary for merit pay eligibility and funding for apprenticeship. No other changes made.**

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