

RECEIVED

**ARKANSAS DEPARTMENT OF EDUCATION
RULES GOVERNING EDUCATOR LICENSURE**

FEB 14 2018

**BUREAU OF
LEGISLATIVE RESEARCH**

SECOND PUBLIC COMMENT PERIOD:

Name: Lucas Harder, Arkansas School Boards Association

Date Received: 12/20/2016

Comments:

1-2.17: Limited enrollment public charter schools were repealed in Arkansas by Act 846 of 2015.

Agency Response: A correction has been made.

1-2.33: There is an unnecessary “33” between “of” and “1965”.

Agency Response: A correction has been made.

1-2.34: There is an unnecessary “33” between “of” and “1965”.

Agency Response: A correction has been made.

3-1.03.2.2.1: There is a comma instead of a period between the “03” and the first “2”.

Agency Response: A correction has been made.

3-2.01.4: May an educator preparation program working on receiving accreditation through NCATE not receive the same consideration for approval of their educator preparation program as those who are working on accreditation through CAEP?

Agency Response: CAEP has superseded NCATE as the accrediting body.

3-5.01.1: The Arkansas Higher Education Coordinating Board was previously abbreviated at 3-2.01.1 and does not need to be unabbreviated here.

Agency Response: A correction has been made.

3-5.01.3: Shouldn't NCATE be included here as well?

Agency Response: No; see previous response.

4-2.01.9: This section references 4-2.01.9 instead of 4-2.01.8.

Agency Response: A correction has been made.

4-3.01.7.2: CAEP can be abbreviated here instead of written out.

Agency Response: A correction has been made.

4-3.01.7.3: National Board Certified Teacher has been previously abbreviated and could be abbreviated here.

Agency Response: No change made.

4-10.08.1: There are two underlines between the “.1” and “An” instead of a tab.

Agency Response: This is corrected in the clean version.

4-4.07.1.1 (Between 7-5.01.1 and 7-5.01.2): Because not all of the language in this section is struck, I’m not certain if this was supposed to be a 7-5.01.1.1 with only portions struck or if it was supposed to be struck in entirety.

Agency Response: The subdivision is deleted and the text will follow from the end of 7-501.1.

Name: Rebecca Miller-Rice, Bureau of Legislative Research

Date Received: 1/18/2018

Comments:

Section 2-4.02.3 – The revised rule states that the “full requirements will be appended to these rules upon approval.” Will these appendixes go through the rule promulgation process before being appended?

Agency Response: Yes.

Section 3-1.05 – In the same vein, the revised rule provides that any “specific additional requirements for educator residency programs” will be appended to the rules after recommendation by the Professional Licensure Standards Board and approval by the State Board. Will these also go through the rule promulgation process before being appended?

Agency Response: Yes.

Section 4-3.01 – The revised rule allows reciprocity to a person holding a current or “expired” Standard License from another state; however, the following sections, sections 4-3.01.1 and 4-3.01.1.2, require the receipt of a “valid” Standard License that has been in good standing. Does an “expired” license constitute a “valid” one, and can an expired license be in “good standing”?

Agency Response: The educator must bring their license current if it is expired. If they don’t, then they have to take all of our current tests for their licensure area and level.

Section 5-5.02 – Section 1 of Act 294 of 2017 appears to permit the Department to seek approval of an alternative method of demonstrating subject matter competency, “[i]f there is no assessment available.” The revised rule, however, provides that such approval may be sought if a licensure content area assessment is not available or “approved.” What is the reasoning behind the inclusion of the latter term, where that provision is not found in the Act?

Agency Response: A correction has been made to follow the language of the act.

FIRST PUBLIC COMMENT PERIOD:

Name: Rebecca Miller-Rice, Bureau of Legislative Research

Date Received: October 25, 2017

Comments:

Section 3-5.02.4 – I believe there might be an extra “s” on the reference to the Administrative Procedure Act, as that Act is entitled in Ark. Code Ann. § 25-15-201.

Agency Response: A correction has been made.

Section 4-2.01.9.1.3 – I think there might be a duplicative “if applicable.”

Agency Response: A correction has been made.

Section 4-3.05 – Aren’t the Arkansas license and the license issued by reciprocity the same? Is it the fact that the out-of-state license was no longer in good standing that permits the Department to rescind the license it issued?

Agency Response: Yes, if the out-of-state license is no longer in good standing, the Arkansas license may be rescinded.

Section 4-4.01.2 – I think there might be an extra “27” in the second cited statutory reference?

Agency Response: A correction has been made.

Section 4-4.02.2 – I believe the same issue might be present as referenced above in question (4).

Agency Response: A correction has been made.

Page ADE 317-57 – I believe there might be two sections numbered 6-2.01.2.4.

Agency Response: A correction has been made.

Section 7-4.03.2.2 – Could something be missing here? Maybe “the applicant must” before successfully?

Agency Response: A correction has been made.

Name: Lucas Harder, Arkansas School Boards Association

Date Received: October 26, 2017

Comments:

1-1.02: Because one of the legal references is for 6-17-401 *et seq.*, there is no reason to specifically include 6-17-422 since it is covered by the *et seq.* of the previous citation.

Agency Response: No change was made.

1-2.02: There is a quotation mark missing after counseling.

Agency Response: This definition has been deleted.

1-2.03.2-4: There is no 1-2.03.1 currently so these should be brought up to be 1-2.03.1-3 instead.

Agency Response: A correction has been made.

1-2.19: Limited charter schools were repealed by Act 846 of 2015.

Agency Response: A correction has been made.

1-2.27 “Educator preparation program”: There appears to be a “for” or “of” missing between “recommendation” and “licensure”.

Agency Response: A correction has been made.

There are two 1-2.27s in the document so all that follow the 1-2.27 of “Educator preparation program” should be one number higher.

Agency Response: A correction has been made.

2-4.02.4: There is a “of” missing between “field” and “education”.

Agency Response: A correction has been made.

2-5.01: There is a “to” missing from between “holder” and “a”.

Agency Response: A correction has been made.

3-2.01.1: Arkansas Higher Education Coordinating Board should have a parenthetical abbreviation after it as it is referred to in later sections by both its acronym and long form.

Agency Response: A correction has been made.

3-5.01.1: If Arkansas Higher Ed Coordinating Board was abbreviated in 3-2.01.1, the long form of AHECB should be replaced with the acronym. If not, there should be a parenthetical abbreviation of AHECB here since the acronym is used later in the paragraph.

Agency Response: A correction has been made.

4-2.01.9.1.3: “If applicable” appears twice.

Agency Response: A correction has been made.

4-4.01.2: The citation for § 24-7-702 has some extra numbers and an unnecessary space in it.

Agency Response: A correction has been made.

4-4.02.2: The citation for § 24-7-702 has some extra numbers and an unnecessary space in it.

Agency Response: A correction has been made.

4-8.01.1: “Licensure” should be removed.

Agency Response: A correction has been made.

4-8.01.2: Would recommend changing the beginning to read “If not a United States citizen, provides”.

Agency Response: A correction has been made.

4-8.01.3.1: If the intent is to require that the country’s official language and the language of instruction in higher education both be English, then I would recommend moving “is English” to the end of the sentence for clarity.

Agency Response: A correction has been made.

4-8.03.4: The “of the” should be removed from “passing scores on the of the stand-alone reading”.

Agency Response: A correction has been made.

5-1.02: Would recommend changing “issue date” to be either “issuance date” or “date issued”.

Agency Response: A correction has been made.

5-1.03: Would recommend adding a “the” or “an” to the very beginning.

Agency Response: A correction has been made.

5-1.04: The end should read “expires on December 31 of the fifth year from the year of renewal” as the current language would only have the renewed license being effective for a single year.

Agency Response: A correction has been made.

6-1.01.4.1: Library media specialist appears to be missing from the list of positions that would count as prior employment in working towards a building level administrator’s license.

Agency Response: A correction has been made. Library media specialist was inadvertently omitted from the previous rules.

7-1.01: “This Chapter 7” seems redundant and would recommend either “this Chapter” or just “Chapter 7”.

Agency Response: No change was made.

7-1.03: “This Chapter 7” seems redundant and would recommend either “this Chapter” or just “Chapter 7”.

Agency Response: No change was made.

7-3.01.5: The “or” should be “for”.

Agency Response: A correction has been made.

7-3.01.5.2: I would recommend removing the “this” from between “of” and “section” as it seems redundant and would capitalize “section”.

Agency Response: A correction has been made to capitalize Section.

7-4.03.2.1: There is a comma missing between “ALP” and “the”.

Agency Response: This provision was rewritten.

I would recommend changing the period to a semicolon followed by “and” in order to indicate that both 7-4.03.2.1 and 7-4.03.2.2 must be completed.

Agency Response: A correction has been made.

7-4.03.2.2: There is a comma missing after “alp” and I would recommend adding “the educator must” before “successfully” as there is a noun missing otherwise.

Agency Response: A correction has been made.

7-4.05: “4-4.02.2” should be “7-4.02.1” and there is a “to” missing from in front of “complete”.

Agency Response: A correction has been made.

7-5.01.3.1: There is a “these” missing from in front of “rules” to match 7-5.01.3.2 and 7-5.01.3.3.

Agency Response: A correction has been made.

Appendix A, Chart 4, Item 581: There is a space between the “I” and “n” in “cabinet”. Item 619: “Manderin” has a space between the “I” and the “n”.

Agency Response: A correction has been made.

Name: Patsy Ramsey, UCA

Date Received: October 29, 2017

Comment: I wish to express my deep concern about the proposed changes to the teacher licensure and teacher preparation rules. While I understand the need for more teachers in the state, I regret that Arkansas Department has chosen to reduce the academic standards that have helped us produce well prepared, highly competent teachers.

In 2001, I came to UCA as the social studies education program coordinator. At that time the state was implementing a set of standards that would make an education degree harder to get than most other degrees. The GPA for program admission and graduation rose to 2.7, considerably higher than the 2.0 required for most other degrees on our campus. Teacher candidates had to pass a basic test in reading, writing, and math for program admission, eliminating those with weak writing and grammar skills from the beginning. As a result, our admission numbers dropped but the quality of students graduating from our program rose. New teachers trained and educated under the current set of standards have high degrees of content knowledge and a high level of pedagogical skills and dispositions. They enter the classroom ready to teach.

My greatest concern is that anyone with a college degree can get a teaching job with almost no content knowledge, and having no more than slightly above a D average (2.0) in overall coursework. Do we really want our children taught by people with no content knowledge and no academic background in the subjects they may teach?

I know that university teacher education programs may set their own admission and graduation standards, but I cannot imagine why anyone would go to the added work and expense of obtaining an education degree when they can be hired without it.

Agency Response: Program admission requirements are set by the university, and must be rigorous enough to meet CAEP accreditation standards. Feedback from other universities has been that programs are willing to work with students to get their SPA up throughout a preparation program, but that the 2.7 GPA eliminates some good teacher candidates.

Name: Jeff Whittington

Date Received: October 27, 2017

Comment: I'm writing to express my concern over the proposed ADE Rules Governing Education Licensure. As a parent of two young women in the public school system (Greenbrier Middle and Junior High), I am concerned about the move toward lowering standards for public school teachers. My first concern is with the deletion of a standardized exam (ACT or Praxis I) scores and GPS [sic] requirements for entry into teacher education programs. I understand that universities may, and will, have higher standards due to accreditation policies, but I believe the Arkansas Department of Education should also require a minimum screen for teachers entering the profession. The Arkansas Department of Education should desire highly effective teachers. Lowering expectations will not help to produce effective teachers. Deleting these requirements is sending the wrong message to the public. Lowering expectations has never raised results.

I am also concerned with the newly proposed residency programs for alternative teacher licensure. There are already two avenues for alternative licensure, MAT programs and the Arkansas Department of Education's non-traditional licensure training process. These programs help to ensure highly effective teachers are entering our public schools. There is no need for another avenue, especially one that has few if any guidelines for implementation, does not specify the requirements for the education level of the personnel training these teachers, and does not have the rigor of MAT and non-traditional licensure programs. A better method might be to partner schools with universities for these training programs so that rigor is upheld and effective teachers are funneled into the public school system.

I do not want my daughters being taught by someone who participated in a residency program, received a standard license, and then moved on to our school district.

The idea that the Arkansas Department of Education and the governor of the state would reduce the requirements for teacher licensure when what we need are more effective teachers is an insult to the residents of this great state. We can not overcome the deficits in our education programs by weakening the standards for teachers.

Agency Response: Regarding "lowering standards for public school teachers," these changes do not reflect a lowering of standards, but rather a shifting of responsibility to the educator preparation programs.

Regarding alternative educator preparation, there are currently six (6) alternative pathways to licensure in Arkansas. All new programs will go through the approval process outlined in the Alternative Preparation Protocols.

Regarding residency programs, the proposed residency programs will involve partnerships between school districts and higher education with rigorous standards.

Name: Heather Newsam, Director of Teacher Licensure and Placement, UALR

Date Received: November 6, 2017

Comments:

4-5.01.6 - Requiring ethics training prior to provisional licensing for non-traditional students will negatively impact both these students and the districts that seek to hire them on the provisional license. As the licensure officer at UA Little Rock, I have seen students interview and be offered a position as late as mid-August while they are in the process of enrolling in our program. The job offer and enrollment happen simultaneously, therefore requiring ethics training *prior* to provisional licensing might make it difficult for districts to hire these students, leaving classrooms without teachers at the beginning of a school year. Perhaps a better solution is to require ethics training be completed within a certain amount of time *after* the provisional license is issued. Perhaps within 6 months? This grace period would allow students to complete a university course, or module that we design, but would still give them the ethics training they need early in their careers.

Agency Response: Ark. Code Ann. § 6-17-409, as amended by Act 294, requires the training prior to issuance of a provisional license.

4-5.01.8.4 - The language here was specifically designed for the SpEd Resource license at the request of a state board member when the new area was being explored. Using the SpEd Resource language in this section without distinguishing it from non-traditional SpEd K-12 programs expands the requirements for multi-sensory reading instruction beyond what was originally intended. The competencies that Special Educator K-12 preparation programs must meet to gain approval in the state are based largely on the CEC standards, which include the:

- Diagnosis and treatment of reading problems: determining patterns of weakness
- Determining appropriate types of intervention
- Scaffolding students in use of reading strategies as they move toward independence and self-regulation

The language in these competencies allows programs to design instruction in multiple strategies already; therefore, no specificity is necessary, which may be perceived as limiting.

Agency Response: This is already included in the competencies. Therefore, the rules will be amended to remove the language from this section.

Name: Dr. Victoria Groves-Scott, Dean, College of Education, UCA

Date Received: November 3, 2017

Comments:

We have a responsibility to make sure all children in the state of AR have highly effective teachers who can raise student learning outcomes and do well on TESS evaluations. I think it's important to ensure partnerships by requiring EPP participation in district based Teacher Residency programs. EPPs are poised to fully participate.

- I believe that a Teacher Residency program could have a transformational effect on teacher training and licensure in Arkansas, but this must be done through the careful examination of and alignment with best practices. These programs have not done well in states where standards for the programs are not initially set. Therefore about the lack of specificity, I'm concerned in the rules related to the Arkansas Teacher Residency program (1-2.15). As a dean for a college of education, working under CAEP accreditation, I appreciate the standards set by CAEP and recognize the importance of teacher training guided by professional standards and evaluated through a process of assessment. I'd like to see these things included in a Teacher Residency program. Specifically, I think teacher residency programs should:

- Require an EPP (higher education) partner. As partnerships take more of a central roles, the meaningful partnership between Teacher Residency programs and EPPs could change the delivery of teacher training and ensure highly effective teachers across the state.
- Specify standards in Teacher Residency courses related to professional recommended practices.
- Specify college GPA of those entering a Teacher Residency program to ensure all teachers have adequate basic skills.
- Require specific undergraduate degrees related to the content. If a teacher residency program allows a person with a degree in social work to teach chemistry, it's unlikely that the person will be prepared for the content and thus unlikely that they could pass the required testing for licensure.
- Require a range of experience related to the licensure level. Teacher Residency programs should require the participants to work across the licensure level. This would eliminate the instance where a person is licensed to teach K-6 but has only worked at the 1st grade level.
- To ensure effective teachers after the residency program, the state should set a performance based assessment such as the edTPA (that is used in APLE) (sic). I'm concerned that some people might get licensure though a Teacher Residency program but be unable to meet teacher effectiveness measures based on TESS and student performance after the completion of the Residency Program. We need to ensure that those in residency programs will be completely prepared to be effective teachers are defined by ESSA.
- Specify ethics training in Teacher Residency programs. These programs and participants should be held to the PLSB ethics rules.
- I believe that special education requires a more intense Residency program working across the age levels and disabilities categories for special education.

This is a special population that needs to be protected to ensure those with licensure can meet the substantial demands for teaching children with disabilities.

- Require SPE resource Residency programs to pass the Foundations of Reading test for licensure.

I think if left unregulated, these programs could leave children in certain areas of the state with poorly trained teachers who hold a license that is equivalent to students who worked 2 years to get a degree.

Agency Response: There is no intent for residency programs to be unregulated. Residency programs will go through the same approval process as any other new program submission. If the program is based at an IHE and is for college/university credit, the program would use http://www.arkansased.gov/public/userfiles/Educator_Effectiveness/Becoming_a_Teacher_or_School_Leader/1_Protocols_IHE_Programs.pdf. If it is an alternative provider and not for college/university credit, the program would submit using http://www.arkansased.gov/public/userfiles/Educator_Effectiveness/Becoming_a_Teacher_or_School_Leader/7_Protocols_Alt_Prep_Programs_rv1.pdf. The process allows programs to be innovative but still with oversight and meeting high standards.

Regarding ethics training, if a Residency Program is submitted as an alternative educator preparation program, then candidates must complete ethics training prior to provisional licensure. If a Residency Program is submitted as a traditional program, then ethics must be part of curriculum in the approved program.

2-4.02.1 - I like the idea of the tiered license, especially if districts decide to move higher pay for the upper levels.

Agency Response: Comment appreciated.

4-8.03.4 - The 25% 75% rule for field experience has been removed for EPPs which allows greater flexibility. I like the addition of a “range of experience across the entire level of license”, this should be repeated in the rules for the Teacher Residency Programs.

Agency Response: Comment appreciated.

3-1.04 - The PLSB annual review should also include non-traditional teacher training programs and Teacher Residency programs. It's important to hold all teacher training programs to high standards to demonstrate our commitment to all of the children in AR. If we truly care about the quality of education for children in the state of Arkansas we must care about the training ALL teachers get, not just those teachers who go through teacher preparation programs associated with EPPs.

Agency Response: All approved Educator Preparation Programs will be evaluated, and future Educator Preparation Program Quality reports per Ark. Code § 6-17-422 and 3-1.04 in these rules will reflect that review. Also, all non-legislated alternative educator preparation programs must go through the approved program proposal process that was recently approved by SBE.

4-2.01.9.3 - “Extenuating circumstances” for provisional – what are some examples of this? This should be defined.

Agency Response: These are handled on a case-by-case basis. A serious medical reason is an example of an extenuating circumstance.

4-2.0 - This does not address those completing in state licensure programs who are not US citizens – can they be licensed?

Agency Response: Sections 4-8.01.2 and 5-5.02 provide the requirements for licensure for non-U.S. citizens.

4-8.01.2 - Does this apply to those seeking initial licensure?

Agency Response: Yes.

4-10.03.1 - What type of documentation will ADE accept to prove the 3 years of teaching at the licensure level sought?

Agency Response: The ADE will require verification from the school district or other educational entity where the applicant was employed.

Clarify whether the removal of endorsement by testing out of Art, Business, Computer Science, Foreign Language, Music and PE 2-3.04.1 [sic] is indeed no longer going to be an available option.

Agency Response: Available endorsements by testing out are now identified on Appendix A, and all of the mentioned areas are included.

1-2.02 – Add CACREP in the language

Agency Response: A university may choose to have the Council for Accreditation of Counseling & Related Educational Programs (CACREP) accreditation, but it is not required for state program approval.

1-2.10 – Clarify the impact of the Ancillary License, especially since it is renewable

Agency Response: This has not changed since previous rules. An ancillary License is limited to a few areas and except for a very few endorsements, another licensure area

cannot be added to the license. Ancillary licensure areas have been added in Appendix A, Chart 3.

Between 1-2.17 and 1-2.18 – add CACREP

Agency Response: A university may choose to have the Council for Accreditation of Counseling & Related Educational Programs (CACREP) accreditation, but it is not required for state program approval.

1-2.34 [1-2.35] and 1-2.52 – clarify the language to distinguish the reason for having both terms and definitions

Agency Response: As these two terms are synonymous in their meanings for the purpose of these rules, the term “internship” will be replaced with “supervised clinical practice”.

Chapter 2 – for EPP educators that must maintain a license, what Tier level license must an educator hold? Are the additional requirements publicly available for review? What does this look like?

Agency Response: Educator preparation programs would make the decision as to what tier license a faculty member must hold. The requirements are in the process of being developed and will be published when they are finalized.

4-4.01.2 – retired from active teaching (P-12 classroom) – does this apply to EPP faculty to obtain Lifetime teaching license?

Agency Response: Yes, if the faculty member previously held an Arkansas teaching license.

4-8.03.2 – “Early Childhood Education” – should this be specified SEBK (or other more universally used name)? AR no longer has EC stand-alone licensure

Agency Response: The reference has been corrected to Elementary Education (K-6) “or for any elementary licensure level that includes a grade within K-6”, which will include licensing by reciprocity and any P-4 licensees that may still be obtaining a license for that level.

Under 4-10.02.3.1 – see struck 2-3.01.3 – it seems as though the PLT has been removed as test for the Dyslexia Endorsement, correct?

Agency Response: The stricken language has been moved to 5-5.02.

5-2.03.1 – what will demonstrate proficiency?

Agency Response: The Division of Learning Services is currently developing the professional development and assessment that the applicable teachers will use to demonstrate proficiency.

5-2.03.2 – what will demonstrate “awareness of best practices”? How are “best practices” defined for this item?

Agency Response: The Division of Learning Services is currently developing the definition of “best practices” and the professional development that the applicable teachers will use to demonstrate the awareness.

4-2.01.3.0 - Does this also include test #5511 for SPED?

Agency Response: Yes.

4-2.01.6 - “and requirements” is not clear. Does this include candidates that completed an accredited program 10+ years ago?

Agency Response: That phrase is not located in 4-2.01.6. If the comment is referring to 4-2.01.5.2.1, “current licensure assessments and requirements” means the licensure assessments and requirements for a particular licensure area or licensure level under these rules. It does include a candidate that completed an accredited program more than 10 years ago, if that candidate never obtained the required verification from a licensure officer at the university.

4-10.02.5 - Will those adding the areas by testing out not be required to have the additional 6 hours of reading coursework?

Agency Response: The correct section appears to be 4-10.02.4. That requirement has been removed based on the new stand-alone reading test requirement.

Name: Peter Maggio, Principal, Spring Hill High School, Hope, AR

Date Received: October 31, 2017

Comment: The idea of a tiered licensure system is intriguing; however, I do think that there needs to be some way for building administrators to have a say in whether the teacher can move from one tier to the next.

If a teacher can apply for the next tier upon simply meeting the qualifications for the license, how will the ADE know whether or not the teacher is “effective” without at least some support from the school administration?

Especially if districts are going to tie salary increases to these tiers of licensure (which I suspect was the whole point of the law), I think it’s important that school administrators get a say in whether or not the applicant has met the requirements for leveling-up and receiving that increase in pay.

I also don't think that teachers should be able to declare themselves as "building leaders" simply by completing an application from the ADE. I'm quite sure that every administrator can attest to the fact that there are "leaders" who don't have the students' best interests in mind and there are true leaders who make informed decisions based on what's best for kids.

There's more to a leader than a simple licensure tier (or endorsement), and as the principal, I want to be able to delegate leadership roles to those in my building who are going to help our students, not use their new "licensure tier" to pursue their own agendas.

Agency Response: Licensure is a state regulatory function; however a teacher will have to provide verification from the school district that she or he meets the requirements of an effective teacher. The licensure requirements will be objective and not a self-declaration. The full licensure requirements will be appended to the rules when they are adopted by the State Board through the rules promulgation process.

Name: Nancy Fancyboy, NBCT

Date Received: November 1, 2017

Comment: This needs more time for teachers and other stakeholders to respond. Teachers are drowning right now in classroom work and really don't have time to read over 100 pages that will greatly impact their work environment.

I have great concerns about some of this. For example, Tier 4 leaders will end up being the friends of administrators--the yes people. National Board-certified teachers are among the brightest and motivated teachers. Many are leaders. This is very threatening to many administrators. Personally, I'd never get a Tier 4 role because I suggest changes and point out flaws in what we are doing as a building and district. An example: My area of expertise is literacy. I'm generally regarded as an expert amongst my peers. I was placed on the literacy ACSIP committee our first year in the current building. At the first meeting, I gave suggestions when they asked for them. And everyone looked at me like I was crazy. By the next meeting I'd been placed on the math committee and have stayed there for 8 more years. I'm sorry, but most of the administrators we're dealing with DO NOT make decisions based on

Another example: 4 teachers in our building were placed on a building leadership committee. 1 of them has lied to the principal multiple times about various things (and the principal know it), and the other went into a classroom over the summer and unbolted bookshelves from the wall and moved them to her classroom. The teacher reporting it was told not to tell anyone who did it. But...she's on our building leadership committee. By the way, she's the daughter of a party buddy friend of the principal.

There are too many egos and too much brown-nosing here for the Tier 4 to ever make real change for our students unless it there is more meat in it.

Agency Response: The Department has solicited and received a considerable amount of stakeholder feedback on the career continuum from teachers and administrators. These rules represent a state policy that supports teachers through a career pathway that recognizes leadership skills, and seeks to attract new teachers into the profession. The full licensure requirements will be appended to the rules when they are adopted by the State Board through the rules promulgation process.

Name: Jaymey Boston, School Counselor

Date Received: November 2, 2017

Comment: Regarding adding licensure areas:

I have a BSE (elementary ed - licensed PK-4, endorsement 5-6). I have a Master's degree in Counseling (licensure PK-8). In researching, I found on the ADE's website that Family and Consumer Science is listed as a critical academic shortage area. This is a content area I'm very interested in. I called the licensure department and was told that I would not be able to add that due to the fact that my initial licensure is for elementary and that (FACS) is a secondary program.

I feel like this should be reconsidered, particularly with my course of study (48 hour master program) in counseling. Counselors are experts on family systems, development, life span, psychology, and career information. There is a huge crossover of content in these two specific areas.

Also, (stepping away from the counseling piece for a second) with having a teaching degree, I'm an expert at pedagogy, classroom management, instructional practice, assessment, and everything that goes along with being a strong teacher. An elementary teacher completes the same requirements that a secondary teacher does on "teaching" itself - the difference is the content. So, if I can complete the degree requirements to be an educator, and successfully pass a Praxis to prove I understand the content (particularly in a shortage area) than why not make it possible for me to add that licensure?

On the flip side of that, Licensed Professional Counselors are now able to be School Counselors without a teaching degree. This was the result of a shortage of School Counselors. So now a counselor (LPC) can come to a PK-6 level and be considered knowledgeable enough to teach classroom guidance lessons, manage a classroom of students, and possibly be the school test coordinator, sped designee, 504 coordinator and have absolutely NO knowledge of research based instructional practice, not to mention special education needs? Now, this is not something I'm mad about. I'm just saying that it seems reasonable that someone with a teaching degree could add an area of licensure if they can prove they understand the content (they already have been trained how to teach) that they desire to add to their license. Particularly, in a shortage area! Another example that comes to mind is Library Media Specialist. So, a person with a elementary degree could only do elementary library and secondary teachers could only do secondary library? Why not make these areas more accessible if LICENSED individuals want to teach in these domains?

I should simplify this. Basically, I believe that a person who has a TEACHING degree, if he/she can pass the PRAXIS in the content area desired, than that person should be treated like the professional his/she is and allowed to apply, interview and accept a position in that content area. I definitely, at the minimum, think this should be allowed in CRITICAL SHORTAGE AREAS that are identified by the state. We have qualified teachers that are willing to do these jobs if they could be allowed to test and add them to their licensure! I am one of several I know!

Agency Response: The Library Media Specialist endorsement to a teaching license requires that the licensure candidate have some coursework in instructional pedagogy. The Department will consider this comment and determine the need for a future change in the license based on feedback from teachers and administrators.

Name: Sarah McClure, Librarian

Date Received: November 6, 2017

Comment: My name is Sarah McClure and I have comments regarding non-traditional licensure routes, in particular the Professional Provisional Licensure option as it relates to Librarians.

I am currently employed with the Highland School District in Hardy, AR as a K-4 Librarian. I have Bachelor of Arts degree in English and a Master's Degree in Library Science. Prior to moving to North Central Arkansas, my family and I lived in Central AR where I was a Public Librarian for the Central AR Library System for 13 years. My last position with the public library was as the Managing Librarian for the Hillary Rodham Clinton Children's Library and Learning Center. Though I have a Master's in Library Science and now over 15 years' experience as a Librarian, I am employed as a long term sub for the Highland School District.

I am submitting comments because there is no reasonable path for a public librarian to make a change to become a school librarian. Because Library is in the Top 10 shortage areas for our state, I find my journey to be particularly surprising and frustrating. Also, Library Media is a shortage area where demand is currently outpaced by the number of people becoming Librarians. I am enrolled in the Master of Arts in Teaching program at the University of Central Arkansas. I am enrolled in this program specifically because I'm able to earn a teaching certificate, which is what I lack in being a school librarian. This is a significant financial investment and a significant investment of time, but it is something I am willing to do so I can continue to work as a school librarian.

I have found out, however, that because Library is not an initial area of licensing, I will be unable to continue in my current job as a librarian and complete the practicum requirements of the MAT program. In short, the 33 classes and over 600 kids I teach per week do not "count" for my practicum through UCA, because Library is not an initial area of licensing. I could leave my current position, teach in an initial area of licensure (for me, this would be middle school English), complete the practicum, and then hope to return to a librarian position at some point. Because of this, I think Library should be considered for the Professional Provisional option. Even though it is not an initial area, it makes logical sense to me if the candidate already holds a Master's Degree in Library Science that there should be some option for this to take place,

remembering that Library is in the Top 10 of shortage areas in our state. Why am I, a qualified, professional librarian, being ultimately turned away from a position I love and a position that lacks qualified people? To me this is a problem that begs to be addressed! EVEN IF the rules state one thing, why can reasonable exceptions not be made if this is a shortage area for our state? And why would we remove a qualified person from a documented shortage area (not forgetting this person is trying to earn the necessary teaching credentials), because the scenario doesn't "fit" the established rules?

I am employed as a librarian in a school that would like to keep me employed. I am enrolled in a Master of Arts in Teaching program, so that I can earn the teaching certificate that I am lacking in my undergraduate education. But in order to complete this program, I have to leave my current employer, teach in an area of initial licensure, and then hope that once I have done that, I can find another job as a librarian. Being a Librarian is my chosen profession. It is what I have spent my career on and it is what I am passionate about. I do not understand how this Catch-22 situation cannot be remedied to allow a reasonable exception to be made.

In asking the questions I am asking you, I understand that rules are there for reasons and I hope I am conveying respect for the process of creating and maintaining consistency and standards. Yet the conundrum I am in is so mind-boggling ... to be in a position I am qualified for and to be in an additional graduate program in order to meet the educational requirements -yet to be turned away from an area that has a shortage. It seems it is a problem and dilemma that must be addressed.

I assume that Library is not an initial area of licensure because it requires an additional program of study, a graduate degree, in order to be a Librarian. If we had a surplus of Librarians in our state, I would understand why no exceptions, alternate plans or waivers could be allowed. But the fact is we have a shortage: for this reason alone, consideration needs to be given to Librarians who already hold a Master's in Library Science who want to transition from another field of Librarianship into the Public School arena.

School libraries are essential to the health and vibrancy of a school. They create community, foster exploration across subjects, teach critical thinking and technology skills, develop children as readers, and simply invite kids to enjoy the space as readers and learners. Behind all of this, however, is a professional librarian who is not just educated but who cares deeply about the role of Libraries and strives every day to connect kids with books they love. I am that Professional Librarian. I work every day to do those things -weekly with over 600 students. Please listen and understand my comments, and help find a way for me (and surely others!) to help fill this shortage area within our state.

In reading my comments, it is my hope that you will help this situation, but also see that I am a highly educated professional committed to Libraries - and I am stuck because no reasonable path exists for my scenario.

Agency Response: The Library Media Specialist endorsement to a teaching license requires that the licensure candidate have some coursework in instructional pedagogy.

The Department will consider this comment and determine the need for a future change in the license based on feedback from teachers and administrators.

**Name: Dr. Raymond W. "Donny" Lee, Jr., Dean, Cannon-Clary College of Education
Harding University**

Date Received: November 10, 2017

Comments:

These comments represent the collective thoughts of the Arkansas Association of Colleges of Teacher Education and the Arkansas Council of Education Deans. We respectfully submit them for your consideration.

1-2.15 - The rules related to the Arkansas Teacher Residency program seem to lack specificity. As the rules and regulations for teacher training programs offered through higher education get more and more complicated and candidates in those programs are held to higher standards (based on the required CAEP accreditation), it's unclear that the Teacher Residency programs will be held to the same level of accountability. These are questions about teacher residency programs:

- Will the participants have to have a minimum college GPA?
- Will they need to have a related degree (can you get a degree in health and teach high school social studies)?
- Will they be held to CAEP standards, competencies, and assessments?
- Will they participants need a range of experiences (e.g., will they get a K-12 special education license after only teaching 1st-grade special education for a year)?
- Will they get the Tier 1 Early Career License like those who graduated with a degree in education?
- Will they need to pass all the assessments that EPPs are required to give for licensure?
- Can district personnel with a BA train the participants who have a BA (while universities are required to hire people a "level above or with 18 hours at the graduate level to teach)?
- Is there an ethics training requirement for the Residency programs?
- Will Residence programs license in special education? If so, can a person be a resource teacher for one year and get a K-12 license and teach children with autism the next year without support?
- The 25%-75% rule for field experience has been removed for EPPs, but what about a "range of experience across the entire level of license" for the Residency Programs?

Residency programs promise much, but we strongly encourage the state to require a partnership with higher education. Without such a partnership, these programs could leave children in certain areas of the state with poorly trained teachers who hold a license that is equivalent to students who worked 2 years to get a degree.

Agency Response: The proposed residency programs will involve partnerships between school districts and higher education with rigorous standards. Residency programs will go through the same approval process as any other new program submission. If the program is based at an IHE and is for college/university credit, the program would use http://www.arkansased.gov/public/userfiles/Educator_Effectiveness/Becoming_a_Teacher_or_School_Leader/1_Protocols_IHE_Programs.pdf. If it is an alternative provider and not for college/university credit, the program would submit using http://www.arkansased.gov/public/userfiles/Educator_Effectiveness/Becoming_a_Teacher_or_School_Leader/7_Protocols_Alt_Prep_Programs_rv1.pdf. The process allows programs to be innovative but still with oversight and meeting high standards.

Regarding ethics training, if a Residency Program is submitted as an alternative educator preparation program, then candidates must complete ethics training prior to provisional licensure. If a Residency Program is submitted as a traditional program, then ethics must be part of curriculum in the approved program.

4-10.03.1 - What type of documentation will ADE accept to prove the 3 years of teaching at the licensure level sought?

Agency Response: The ADE will require verification from the school district or other educational entity where the applicant was employed.

1-2.02 and Between 1-2.17 and 1-2.18 - Add CACREP in the language. CACREP is not a SPA, but it is a national accrediting agency (similar to CAEP but for counseling).

Agency Response: A university may choose to have the Council for Accreditation of Counseling & Related Educational Programs (CACREP) accreditation, but it is not required for state program approval.

Chapter 2 - for EPP educators that must maintain a license, what Tier level license must an educator hold. Are the additional requirements publicly available for review? What does this look like?

Agency Response: Educator preparation programs would make the decision as to what tier license a faculty member must hold. The requirements are in the process of being developed and will be published when they are finalized.

3-4.02.1 - What are “rigorous admissions requirements” defined as by the ADE?

Agency Response: The Department will meet with higher education stakeholders, including Professional Licensure Board members, to identify the requirements for the 2020 leadership program redesign. When those requirements are fully developed, they will be appended to these rules through the rules promulgation process, and adopted by the State Board.

5-2.03.1 - What will demonstrate proficiency?

Agency Response: The Division of Learning Services is currently developing the professional development and assessment that the applicable teachers will use to demonstrate proficiency.

5-2.03.2 - What will demonstrate “awareness of best practices”? How are “best practices” defined for this item?

Agency Response: The Division of Learning Services is currently developing the definition of “best practices” and the professional development that the applicable teachers will use to demonstrate the awareness.

1-2.15, 1-2.27, 4-2.01.5.1 - While this is not new and statutes and regulations allow non-IHE EPPs to recommend teacher licensure, we are concerned that this could potentially weaken the profession. We want to express our concern about this provision.

Agency Response: Comment received, but the Department is unable to adequately respond without further explanation about how this is perceived to weaken the profession.

Name: Amanda Disney-Ladish

Date Received: November 10, 2017

Comment: The proposed changes to state licensure regulations for teachers are inept at best and awful at worst. These tiered systems are ambiguous, unclear, and impossible to regulate with equity statewide. These changes will not be helpful or appropriate practice for our students or teachers.

Having a test out option for elementary is a ridiculous notion showing that legislatures are unaware of the rigor, grit, and education required of a high quality elementary teacher. As generalists AND specialists, our careers are not to be underestimated. We must think on our feet, make intense decisions for our youngest students and provide an engaging learning environment. On top of all that, we must also play roles of psychologist, nurse, mentor, role model, literacy coaches, test proctors, supervisors, data entry professionals, and much much more.

To totally discount our education, training, and expertise and trivialize it by opening up possible teaching positions through an EXAM and some PD is a slap in the face to elementary educators statewide who put in the YEARS of college courses, internships, blood, sweat, and tears. Not to mention the loans often associated with college tuition...

These types of ideas do NOT provide quality learning environments for students. Looking to address teacher shortages? Make the profession more appealing and more lucrative; not less!

Agency Response: Regarding the tiered licensure system, the Department has solicited and received a considerable amount of stakeholder feedback on the career continuum from teachers and administrators. These rules represent a state policy that supports teachers through a career pathway that recognizes leadership skills, and seeks to attract

new teachers into the profession. The full licensure requirements will be appended to the rules when they are adopted by the State Board through the rules promulgation process.

Regarding the test-out option for Elementary Education (K-6), this has been in previous rules. The test-out option is only available to someone who already holds a teaching license.

The Department holds teachers in high regard and endeavors to always elevate the teaching profession through standards, licensure, and career pathways to ensure that all Arkansas students have effective teachers.

Name: Corrie Tucker

Date Received: November 12, 2017

Comment: I am currently a first grade teacher in Springdale, Arkansas, and President of the Springdale Education Association. I am writing because I am very concerned with some of the proposed changes to the Teacher Licensure Rules.

First of all, I find the suggested "Tiers" to be very troublesome. (2-4.02.1 through 2-4.02.4). How will these tiers be funded? Being raised in a small town in Eastern Arkansas, I fear that these tiers will only increase the disparity among school districts. Well resourced districts are able to attract and pay Tier 4 teachers and other school districts are still trying to pay their teachers the minimum required salary. EVERY STUDENT deserves a Tier 4 teacher! Also, what will the requirements for these tiers be, since the Board has not put those into place yet? How will Tier 4 teachers be determined? Who will do their observations to ensure the observation is unbiased? What happens when a teacher obtains Tier 4--do they maintain that status each year? It would be unfair to minimize their pay one year if they fall back to Tier 3? When are teachers going to find the time to perform at national events? We should be in the classroom WITH our students. Again, this raises my disparity question..how are low income school districts going to be able to pay to send their teachers to national events to attain Tier 4 status?

Also, if an educator's preparation program has been discontinued by the board, why on earth would we want them to continue in that program??? Clearly, there must be some sort of problem with it if it is being discontinued. (3-5.02.5) The same goes for even considering to admit a person for enrollment in a APPEL program who has been dismissed from another educator preparation program. The language here should be changed to "shall refuse to admit," instead of "may refuse to admit." (4-7.04) Someone would have to do something pretty bad to be dismissed from an education program. Why in the world would we want to put them in a classroom with students??

Finally, elementary teachers are special teachers with MUCH training their fields! Teaching 6 year olds is a whole new world compared to teaching 16 year olds! Why would we make it possible for anyone to take a test and be able to teach elementary children? (pg. 90, Appendix A)

These are just a FEW of the concerns I have with these proposed changes. Please reconsider them ALL, as they would truly NOT be in the best interest for the children of Arkansas!

Agency Response: Regarding the tiered licensure system, the Department has solicited and received a considerable amount of stakeholder feedback on the career continuum from teachers and administrators. These rules represent a state policy that supports teachers through a career pathway that recognizes leadership skills, and seeks to attract new teachers into the profession. The full licensure requirements will be appended to the rules when they are adopted by the State Board through the rules promulgation process. Once a teacher receives a license at a particular level, the license will not revert to an earlier level.

Regarding the discontinuation of an educator preparation program (3-5.02.5), the Department key word is “may”. If it is not feasible or advisable for a candidate to finish coursework in that program, the Department works with other preparation programs to assist those candidates in completing their programs.

The refusal to admit an applicant into the APPEL program based on the applicant’s dismissal from an educator preparation program (4-7.04) is permissive in order to give the program the authority to refuse admission. The APPEL program considers these circumstances on a case-by-case basis.

Regarding the test-out option for Elementary Education (K-6), this has been in previous rules. The test-out option is only available to someone who already holds a teaching license.

The Department holds teachers in high regard and endeavors to always elevate the teaching profession through standards, licensure, and career pathways to ensure that all Arkansas students have effective teachers.

Name: Myrrel Lee Low

Date Received: November 9, 2017

Comment: I am a retired school secretary with over 28 years of experience, mostly with the Little Rock School District but a few years at The Anthony School in Little Rock. I am writing to ask you to consider the rules and regulations concerning School Librarian licensure in our state. It is my understanding this is a critical shortage area. Despite this, however, I have a friend whose daughter is a Librarian with a Master’s in Library Science. She is having to earn an additional Master’s degree in teaching to fulfill the teaching certificate requirement of her position. I am aware that there are waivers, provisional licenses, and alternative routes for so many other people – why are we not making that available in Library? Especially as a critical shortage area? The cost and time of this additional graduate degree is really a lot to take on and she is already a professional librarian.

Librarians are so important to the health of a school. I think our state is lucky to have this person as a school librarian, but she is working awfully hard just to keep her position as “long term sub.”

I really hope you will do what you can to investigate this and to make this situation better. It is just not logical! I do not contest that she needs educator training, but I do not think a graduate degree (Master of Arts in Teaching from UCA) is the answer here.

Thank you for your time and consideration.

Agency Response: The Library Media Specialist endorsement to a teaching license requires that the licensure candidate have some coursework in instructional pedagogy. The Department will consider this comment and determine the need for a future change in the license based on feedback from teachers and administrators.

Name: Veta Flanagan, Retired Educator

Date Received: November 9, 2017

Comment: The regulations for school librarian licensure in the state need critical review by knowledgeable people with a duty that imparts the best interests of the schools these librarians serve. A fully competent and functioning school librarian in the state is required to enter college and work to earn an additional master’s degree in teaching along with his/her daily load at school. What is the sense of this extra college work when schools are already facing a shortage of school staff? Please reconsider – It only serves to diminish the confidence of the librarian and create added stress for their assigned role in the school working with students and teachers.

I am a retired teacher from public school teaching in the state and I was disturbed to hear about this plight for a librarian that I’m acquainted with who is working and raising a family and faced with this added issue of expense and time for keeping their library certification.

Agency Response: The Library Media Specialist endorsement to a teaching license requires that the licensure candidate have some coursework in instructional pedagogy. The Department will consider this comment and determine the need for a future change in the license based on feedback from teachers and administrators.

Name: Bobby R. Hall

Date Received: November 9, 2017

Comment: I am a retired State Employee of 35 years. I was a secondary classroom teacher in the Warren and North Little Rock school district for two years. I was a Training Manager and Director of the Small and Minority Business Division for the Arkansas Department of Economic Development.

I am writing to ask you to consider the rules and regulations concerning School Librarian licensure in our state. It is my understanding that this is a critical shortage area. Despite this, however, I have a friend whose daughter is a Librarian with a Master's in Library Science. She is having to earn an additional Master's degree in teaching to fulfill the teaching certificate requirement of her position. I am aware that there are waivers, provisional licenses, and alternative routes for so many other people, why are we not making that available in Library? Especially as a critical shortage area? The cost and the time of this additional graduate degree is really a lot to take on and she is already a professional librarian.

Librarians are so important to the health of a school. I think our state is lucky to have this person as a school librarian, but she is working awfully hard just to keep her position as a "long term sub."

I really hope you will do what you can to investigate this and to make this situation better. It is just not logical! I do not contest that she needs educator training, but I do not think a graduate degree (Master of Arts in Teaching from UCA) is the answer here.

Thank you for your time and consideration.

Agency Response: The Library Media Specialist endorsement to a teaching license requires that the licensure candidate have some coursework in instructional pedagogy. The Department will consider this comment and determine the need for a future change in the license based on feedback from teachers and administrators.

Name: Colleen Nulty

Date Received: October 13, 2017

Comment: Renewal of a license that expires in 2021 and thereafter, an applicant shall provide the following...proficiency in the scientific instruction of reading if applicant has not previously completed the stand alone reading assessment for licensure...does that mean we will be required to take a test? I haven't been in the classroom for 18 yrs and feel that is an unfair requirement to ask of someone who has been in this profession for 29 yrs 11 in the classroom and 18 as a counselor.

Those in the profession 25 or more years need to be exempt/ "grandfathered in" from taking a "science of reading proficiency" assessment. Experience speaks louder and needs to hold more weight than an assessment. Also, if you've been out of the classroom for 15 or more years serving in another capacity at the elementary level, for example counselor, you need to be exempt.

Agency Response: No, there will be professional development available with some assessment of proficiency as required by Act 416 (2015). That is being developed currently and additional information will be provided at a later time. The law did not provide a grandfather provision.

Name: Donna Wake, Associate Dean, University of Central Arkansas

Date Received: October 16, 2017

Comment: The provisions outlined in 1-2.15 Arkansas Teacher Residency Program and 7-2.0 Emergency Teaching Permit raise concerns regarding a potential degradation in quality for the preparation of teachers for all K-12 students. It appears that that PPTL pathways are not held to the same rigorous accreditation requirements as the traditional pathways and represent a furthering erosion of the education profession. The intent of the PPTL pathway implies "anyone" can teach, and that is demonstrably not true. While residency programs have had some document successes, to ensure high quality programs in this pathway, these programs should be required to work with higher education partners to ensure implementation of research-based practices. These programs should be held accountable to the same external requirements as the EPPs. I would hate to the state lower standards for alternative routes while at the same time increasing the standards for EPPs representing a clear agenda-driven (not research-driven) policy.

Agency Response: The residency programs will have to meet the standards and protocols established for all educator preparation programs (see responses to Groves-Scott and Lee above).

Name: Jennifer James, M.Ed.

Date Received: November 13, 2017

Comment: With the upcoming law change and revision of rules regarding potential teachers not having to take the CORE Praxis for applicants seeking the PPTL, though the content knowledge Praxis will remain.

My hope is that this change of rules happens in a timely manner, because there are individuals in our state who are relying on a quick turnaround of the law so that they can begin work as full-time, yet provisional teachers at the beginning of the new semester in January. With their livelihood in the balance of waiting on such a change, I think it prudent to push this in a timely manner through the proper channels.

Having gone through the system as a Non-traditional teacher, I feel the importance of this change and that it attracts qualified, enthusiastic, and mature educators for our students.

Agency Response: The Department is proceeding as expeditiously as possible with the rules. However, the rules promulgation process is governed by law and by the rules of the Bureau of Legislative Research.

Name: Mindy Becker

Date Received: November 13, 2017

Comment: I am emailing in regards to public comment regarding Act 294 of 2017. This revision of the current rules will remove the CORE Praxis for applicants seeking the PPTL, though the content knowledge Praxis will remain. I am told that the new rules regarding the PPTL are going through the promulgation process. I am asking that this process be expedited so that teachers in this situation can be hired and fill positions before the end of this semester. Currently some positions are being filled with long-term substitutes until pending applicants are hired. This is not a good situation for the students, the school or the teachers waiting for this rule to go into effect. Expediting this law will be a win for everyone involved.

Thank you for your efforts to expedite this decision!

Agency Response: We are proceeding as expeditiously as possible with the rules. However, the rules promulgation process is governed by law and by the rules of the Bureau of Legislative Research.

Name: Wende Willbanks

Date Received: November 13, 2017

Comment: I am writing to request the implementation of Act 294 of 2017 regarding new rules to lift the CORE Praxis requirements for applicants seeking the PPTL. I have been in this process for some time and have met ALL of the current requirements with the exception of a passing score on the CORE Mathematics Praxis. As a former professional employee in business and marketing, I am skilled and knowledgeable of the workforce and have much experience to bring to the classroom. I also have the ability to teach life-long skills that will enable students to become college and career ready and establish an essential foundation of business knowledge to become productive citizens. Educating students to become responsible leaders and skilled employees is a primary goal of business education. The PPTL will allow individuals like myself who have not received a traditional education degree to inspire young entrepreneurs with greater opportunities. As a mother of 3 and dedicated wife of 25 years, the immediate implementation of these rules will have a significant impact on my family as well as dozens of others who are just waiting to share their passion and calling. I have an offer of employment pending the implementation of these rules and request that the new rules be effective by next semester and/or "late fall" as the letter I received in May stated. Thank you for your time.

Agency Response: We are proceeding as expeditiously as possible with the rules. However, the rules promulgation process is governed by law and by the rules of the Bureau of Legislative Research.

Name: Kimberly Bennett

Date Received: November 13, 2017

Comment: I am sending this email on behalf of a classified employee wishing to obtain her PPTL License. They were told the CORE Praxis requirement would be removed from the list of things necessary to obtain a teaching license, and she has been offered a part-time teaching position. However, she is still not being granted her license from the ADE.

It makes much more sense to put emphasis on internship and hands-on experience over a Praxis requirement. Those of us who hold traditional teaching licenses were all required to do many hours of supervised teaching and were observed countless times, before being released into the classroom unattended. The fact that a Praxis test holds more emphasis than this, is not in the best interest of students. My suggestion is to allow these PPTL candidates to obtain a license after a reasonable amount of supervised internship, as it was with traditional licensed teachers.

I encourage the ADE to consider this as a more effective means of certifying these teachers than a CORE Praxis test for a subject they will not be seeking certification in.

Agency Response: The Praxis Core assessment is no longer required under these rules for a Provisional Professional Teaching License (PPTL). After the rules are final, the candidate will not have to take that test. The remaining requirements do include (among other things) passing the content area assessment, three years of teaching under a provisional license, completion of 36 hours of pedagogical training (online), and supervision by the school district superintendent.

Name: Sherie Schneidewind

Date Received: November 13, 2017

Comment: I'm writing this email regarding the new PPTL rules that I understand were changed back in May 2017. As we were informed, Act 294 removed the CORE Praxis for applicants seeking the PPTL.

There are numerous outstanding individuals who are highly qualified, a degree in their content area even, who now should have their teaching license in hand based on this change. However, their licenses are being held up by the ADE. This is inexcusable. I am personally aware of an individual who was offered a teaching job based on this new allowance, but because the ADE is dragging their feet, she may lose out on this job opportunity. If nothing else, approve individuals who have teaching positions offered to them immediately so that they don't lose opportunities while you sort through your red tape.

Agency Response: Although the law was passed in the 2017 legislative session, the rules must go through the promulgation process set out in law. We are proceeding as expeditiously as possible with the rules as required by law and by the rules of the Bureau of Legislative Research. We look forward to licensing outstanding educators through our various pathways to licensure.

Name: Jacqueline Bolt

Date Received: November 13, 2017

Comment: I'm writing in support of the implementation of Act 294 of 2017. Many competent, hard-working young professionals are waiting for implementation of this Act in order to obtain jobs in the public education system in much-needed areas. Removing the CORE Praxis requirement while maintaining the Knowledge Praxis component is a reasonable, reliable method for licensure of Provisional Professionals and should be implemented as soon as possible in an effort to ensure that these competent individuals may obtain teaching positions in their knowledge areas.

Agency Response: Although the law was passed in the 2017 legislative session, the rules must go through the promulgation process set out in law. We are proceeding as expeditiously as possible with the rules as required by law and by the rules of the Bureau of Legislative Research. We look forward to licensing outstanding educators through our various pathways to licensure.

Name: Denise Fedon

Date Received: November 13, 2017

Comment: I'm contacting you regarding the new PPTL rules that I understand were changed back in May 2017. As I have been informed, Act 294 removed the CORE Praxis for applicants seeking the PPTL.

I understand there are numerous outstanding and highly qualified individuals who possess a degree in their content area who should now have their teaching license in hand based on this change. However, their licenses are being held up by the ADE. This is inexcusable. I am personally aware of an individual who was offered a teaching job based on this new allowance, but because the ADE is dragging its feet, she may lose out on this job opportunity. If nothing else, approve individuals who have teaching positions offered to them immediately so that they don't lose opportunities while you sort through your red tape.

In this time of teacher shortage, I trust you will put bureaucracy aside in favor of willing, qualified educators.

Agency Response: Although the law was passed in the 2017 legislative session, the rules must go through the promulgation process set out in law. We are proceeding as expeditiously as possible with the rules as required by law and by the rules of the Bureau of Legislative Research. We look forward to licensing outstanding educators through our various pathways to licensure.

Name: Jennifer Hune

Date Received: November 13, 2017

Comment:

1) The rule to allow persons in specialized areas to take alternate routes flouts the research related to both persistence and quality indicators for teachers in those specialized areas, specifically those hard to staff areas such as math and science and special education.

Agency Response: All alternative routes to licensure require that the candidate have obtained a bachelor's degree and pass the content area assessment. Special education is not an area in which someone can test out to obtain a license; candidates must complete a program of study.

2) School leaders (principals) require a good deal more content regarding law, physical plant and personnel than can be learned in a mentoring situation, if the position is new especially. It appears that administrators according to 1-2.07 are not required to train in specialized areas. Legal and ethical concerns are related to such training.

Agency Response: The rules do not set out the curriculum for a program of study for building-level leaders (principals). We use a set of competencies that are outside of these rules and are adopted by the State Board of Education to approve leadership programs. These rules provide that leadership programs will undergo a complete renovation and a new approval process by the Fall semester of 2020. Further details about program requirements will be later appended to these rules through the rules promulgation process.

3) 4-3.01.81. The requirement of the reading test increases the burden on undergraduate/graduate students as well as adds content specific training to programs already unable to add content due to legislative restraints.

Agency Response: The rules implement the law enacted by Acts 416 and 1063 of the 2017 Regular Session of the Arkansas General Assembly.

4) Endorsement areas that support testing out in special education seems to attempt to meet a need, but must be tied specifically to programs of study for that area, in an already stretched higher education environment, such routes may be implausible.

Agency Response: There is only one situation in which a candidate can test out of special education. A candidate who already holds a special education license can test of Age 3-4 Special Education for that endorsement.

Name: Cathy Koehler, AEA President, and Tracey-Ann Nelson, AEA Executive Director
Date Received: November 13, 2017

Comment: The Arkansas Education Association (AEA) offers the following comments in response to the Arkansas Department of Education's (ADE) draft of the proposed Rules Governing Educator Licensure. We recognize the need for the Arkansas Department of Education to issue new rules to respond to Acts 294, 416, 588 of 2017.

As the largest association of professional educators in Arkansas we are pleased to have the opportunity to provide input to shape this rule change. Our comment comes after holding multiple in person meetings with AEA members around Arkansas and requesting additional comment from our general membership which was solicited across multiple platforms. As always, our focus is on how the rules governing licensure can be improved to help students and the profession. Since educator licensure shapes who enters the education profession, it is imperative that these rules are shaped with input from the experts in the field, the people who work with students every day. It is in this spirit that we provide our comment.

ADE held conversations with stakeholders during the 2017 legislative session in regards to various pieces of legislation affecting public education. Unfortunately, ADE did not reengage the AEA during ADE's process to craft the current draft Rules Governing Educator Licensure. ADE appeared before the State Board of Education (SBE) requesting that these rules be released for public comment on October 12, 2017 and the SBE agreed to do so. The proposed changes in this draft document represent significant changes to licensure that have ripple effects throughout the profession and deserve thorough review by educators. Although too late to impact the draft rules that the SBE approved to be put forth for public comment, AEA was pleased to participate in a stakeholder meeting on November 2, 2017 focused on the tired licensure portion of the rules.

Our comments are in two parts. The first part of our comment is focused on concerns regarding tired licensure. The second part of our comment highlights additional concerns throughout the rest of the proposed rules.

Concerns regarding proposed rules governing tired licensure

- On November 2, 2017, ADE identified the National Standards for Teacher Leadership as the framework for building these tiers. AEA understands that this framework has not yet been adopted by Arkansas. Please provide clarity on who the decision maker is that will adopt this framework. It is unclear as to whether or not adopting this framework is within the purview of the SBE via the rule making process. This concern is paramount as the National Standards for Teacher Leadership have been presented by ADE as the framework for shaping the new tired licensure model described in the draft rules.

Agency Response: The Department has used the National Standards for Teacher Leadership to guide the discussions and decisions around the Educator Career Continuum licensure qualifications. Standards are adopted by the State Board of Education, but not a part of the rules promulgation process. The Department has been developing the specific qualifications through the use of stakeholder input, particularly

with a group of teacher leaders, administrators, educator preparation programs, and association representatives.

- In addition, please provide clarity on how the funding for tiered [sic] licensure would work. Would a school district receive any additional funding from the state to ensure resources for the differentiated salary levels? Act 294 states: *A school district may differentiate in the salary levels of the minimum teacher compensation schedule to provide increased salaries based on a tiered licensure system established by the State Board of Education under § 6-17-402.*

Agency Response: These rules do not address funding. As the language of the law is permissive, it is up to each school district to decide how, or if, it is implemented in the school district.

- The draft rules must also provide clarity on how school districts will identify candidates to receive the various tier designations and receive the related compensation in a way that ensures fairness and integrity.

Agency Response: As stated above, these rules do not address funding. The specific requirements will be appended to the rules through the rules promulgation process.

- The rules do not currently, but should address how, if at all, the new tiered licensure levels interface with the Teacher Evaluation and Support System (TESS).

Agency Response: The specific requirements will be appended to the rules through the rules promulgation process.

- We also request clarification on how the tiers will be operationalized. For example, if an educator achieves a certain tier one year but does not complete the related tasks the following year, does that educator see a reduction in salary in the following year? Additionally, the current draft rules state: *An applicant may apply for licensure at any level when the applicant meets the requirements for the level.* Does this mean that mid-year an educator can be deemed to have met the requirements for a new tier? If so, please include how an educator's compensation will be tied to the achievement of the criteria?

Agency Response: The rules do not address salary or specific roles. That is a school district function. The rules provide the flexibility for an educator to apply for any one of the tiers at any time the candidate meets the eligibility requirements.

- These rules need a clear pathway for educators to ensure that they can improve their salary position from step to step. We are concerned that educators may not be able to access the next step in pay because they are part of tiered licensure.

Agency Response: The rules do not address salary as that is a school district function.

General Concerns in current draft rules:

- Pg. 18 3-1.02 This allows the door to be opened for new “approved pathways”. How will the public be notified about what pathways are approved and what is the timeline for that process and notification?

Agency Response: Educator preparation programs are approved by the Department pursuant to rules, standards, and protocols approved by the State Board of Education. The protocols are provided on the Department’s website at <http://www.arkansased.gov/divisions/educator%20effectiveness/becoming-a-teacher-or-school-leader/resources-for-educator-preparation-program-approval>. A list of approved programs may be found by viewing the Matrix for Approved Educator Preparation Programs at Institutions of Higher Education and the Matrix for Alternative Educator Preparation Programs at <http://www.arkansased.gov/divisions/educator%20effectiveness/becoming-a-teacher-or-school-leader/routes-to-teacher-licensurepreparation>.

- Pg. 22 3-5.02 If an education preparation program is suspended, what impact does the suspension have on students enrolled in the program? The rules should clarify what will happen students enrolled in the suspended program

Agency Response: At 3-5.02.5 the rules state, “After an educator preparation program’s approval is discontinued ... the program shall not admit any new student into the program. However, the Department may allow candidates already enrolled to complete the program.”. In addition, the Department has assisted candidates in the past to find an approved program that will work with the candidate to complete the remaining hours and requirements so that the candidate may become fully licensed.

- Pg. 26 4-2.01.6.2.2 If an applicant is seeking licensure via an alternative educator preparation program or pathway the applicant has two pathways to receive the Arkansas History credit. However, students completing the traditional licensure route only have one way to achieve the Arkansas History credit. Please ensure that this is address in the rules so each licensure pathway has the same opportunities to satisfy this requirement. The proposed rule penalizes the traditional student by allowing fewer options towards credentialing.

Agency Response: The options for meeting the Arkansas History requirement are up to the educator preparation program, which must demonstrate how the program will meet the Arkansas History requirement if it is required for program approval.

- Pg. 35 4-601 Throughout the draft rules it states that the traditional licensure and non traditional licensure fees are non refundable. However, rules should also ensure that the provisional license is also non refundable.

Agency Response: There is no fee for a provisional license application.

- Pg. 39 4-8.03.4.1 States that the ADE may extend the provisional license for an out of country applicant, but does not state a limit on how long this can be extended. The rules should include a time certain for limiting or extending a provisional license. An open ended provision as set out in the draft rules seems to penalize native Arkansans attempting to enter the profession.

Agency Response: The Department does provide for a one-year provisional license for an Arkansas candidate seeking a standard license who has completed a program of study but has not yet passed the pedagogy test or met the Arkansas History requirement.

- Pg. 42 4-9.01.1 We are seeking clarity in regards to the draft rules offering ancillary licensure to the licensure areas listed on Appendix A. We propose removing language: *whether or not the applicant is licensed in another state*. We strongly believe that an ancillary license should only be issued if the applicant already holds a license in another state. As a matter of policy, it makes sense to us that Arkansas should be recruiting qualified people to spend their career here. As written, the rule could perversely be made a haven for persons who could not qualify as an educator in another state without securing the same courtesy for native Arkansans.

Agency Response: That is a provision in the current rules and has not been changed for these rules. We do provide reciprocity for the ancillary licensure areas when those areas are acceptable under the rules for reciprocity. The Department is not aware of any evidence that this provides a hardship for Arkansas candidates.

- Pg. 45 4-10.03. This section allows for a licensure applicant to receive a licensure level for teaching 3 years at the level sought—effectively incentivizing teaching outside of license area and making is possible for superintendents to make decisions that negatively impact students. Removing the language following “unless” would resolve any concerns our members have regarding this wording.

Agency Response: The Department is addressing a reality for many school districts that have employed teachers under waivers from licensure, which may include charter schools, schools of innovation, and the Act 1240 waivers. The Department believes that teachers employed in this manner who have been teaching for three years at the level sought for licensure should be allowed to add that area to a license.

- Pg. 46 Concern: There is no time limit on when the survey course is successfully completed in a previous course of study. In other places in the draft rules document, it puts a 10 year time frame on previously earned credits. We propose a consistent time frame be specified here as well.

Agency Response: The Department is assuming this is a reference to Section 4-5.01.8 concerning the Special Education Resource endorsements. This provision of the rules was established by a group of special education stakeholders, who did not establish a timeline for the survey course. The institution of higher education that is offering the

Special Education Resource endorsement program would govern the time period for accepting the course for credit.

- Pg. 50 5-2.03 Concern: A lifetime license does not expire so those individuals will never have to meet the requirement [*professional development for licensure*].

Agency Response: That is correct under the current law. However, a lifetime teaching license holder will have to meet any professional development requirements of employment if the license holder is employed at a public school.

- Pg. 50 5-3.0 Concern: These rules do not list any fee associated with the application to reinstate licensure.

Agency Response: As indicated on Appendix B, there is no fee for the reinstatement of a license.

- Pg. 72 7-4.05 Concern: These rules seem to allow an applicant to seek an Additional Licensure Plan (ALP) in another content area if the applicant does not pass one?

Agency Response: That is correct.

- Pg. 73 AEA is concerned that this allows a school district to tie the ALP to a position and keep an unlicensed person in the same position. This will allow a school to essentially have an indefinite non license holder instructing students. Since having a highly qualified teacher is the biggest factor impacting student achievement, this circumstance should be discouraged and should be addressed in these rules.

Agency Response: The Department assumes this is a reference to Sections 7-4.0 concerning Additional Licensure Plans (ALPs). The approval process for ALPs includes a review of these circumstances and the Department is developing a process to enhance that review.

- Pg. 90 Appendix A: Concern: the lengthy list of endorsements that can be tested out of. In particular this includes **elementary**.

Agency Response: Elementary K-6 may be added by testing out only if the educator holds a standard teaching license that is one level above or below the Elementary K-6 license, such as a Middle School 4-8 or P-4 license. See Section 4-10.

Thank you for your careful consideration of our concerns. The Arkansas Education Association represents thousands of educators from across Arkansas. As such, we appreciate the opportunity to provide feedback to ensure that educators inform this process with their expertise.

Name: Tami Hendrix

Date Received: November 13, 2017

Comment: I am a parent of two children in the LRSD and I am also an educator. I oppose the proposed teacher residency program regarding educator licensure to be considered by the state board.

As an educator who gain licensure through a master's level program from an accredited university, I can tell you that the training I received from the program was invaluable. I learned how to manage my classroom with theory-based best practices and learned empathy and how to work with children as a facilitator of knowledge. The training I received was based on current trends in education and I learned to seek opportunities to keep abreast of the best practices for educators at my level. Contrary to popular belief, having interest and expertise in a subject does not qualify one to teach. Nor does empathy or a desire to help and advocate for kids. A healthy combination of both traits, with proper training, is what makes effective teachers.

Also, school culture can be bane or boon on the proposed plan to allow teachers to participate in a residency program at a school versus taking part in an accredited, regulated and well organized program. I have worked with veteran teachers who loathed their jobs, could not wait to leave, could not respect the students as people and learners and had nothing positive to say about their experience as teachers. I would not want my child's future teachers to be trained by people such as this. I also know wonderful teachers who are the complete opposite, but many of these teachers are not at the title one schools in poorer areas of the city of Little Rock, or even in the state. Children who live in poor areas, whose schools will be strapped for resources will not benefit from this program. When I began teaching I was assigned a mentor I never saw. Luckily I had training to support me as I learned the school's culture and navigated teaching "real" kids day to day. Imagine putting someone with no training in classroom management, literacy across disciplines, integrated curriculum, PLCs, IEPs, 504 plans, and all the rest of the alphabet soup of education in a situation where the person who is suppose to teach them is taking off days or is not as available as they should be?

Additionally, what about compensation? By enacting this new rule the state will be placing additional burden on faculty members in local schools. Will those teachers be compensated for their work in training the new teacher(s)? How will this training be regulated and how will the state know that he or she actually did their job? Will the schools be allowed to form partnerships with accredited programs locally, with state school, rather than for profit national online programs?

As a parent, I feel more confident in an intern from a university being supervised by a mentor teacher in the classroom than I do in a novice teacher, who has never been in a classroom or worked with children in a structured environment. Furthermore, a newly graduated teacher would have my confidence quicker than someone completely new to the profession. I love my children's teachers and they have been licensed professional for quite some time. They have multiple education degrees and licenses and are happy and confident teachers who do not babysit my kids. My children learn in their classes and come home and tell me what they are learning.

These teachers are happy to see my child, teach my child, love my child. Their positive dispositions and training are what gives me confidence in them.

As for the tiered licenses, I think this makes sense IF the various levels also come with compensation. Also, will teachers automatically move into the next tier or will there need to be a display of competency for the next tier up? To keep teachers motivated to seek professional development and further their education (which is necessary and I do not agree with the rule to rid the state of mandated PD hours) the tiers should also include PD, years of service, service to the education community, and recommendations. There are far too many bad teachers in the state. This could be a weeding out process so that good teachers get their due and a way can be made for just cause in firing teachers who are not in it for the kids.

I want the best for the children in our state. Not just those with means or without; all of them. Please reconsider the teacher residency program, or at least think deeply about how to make it effective. Research states that have done this and examine how they were successful or why they failed. Talk to the experts. You have award winning education programs in Conway, Little Rock, and Fayetteville. Talk to the instructors and professors and get their input if you haven't already. They are experts in this field and could offer insights that need to be considered for the sake of education in this state. According to the NEA Report of school rankings by state, in both 2015 and 2016 we were ranked number 33. While that is better than 51, consider this, the number one state is California, which does have teacher residency programs. However, their program is linked to universities. In essence, they host alternative licensure programs through the universities that are ran like service-learning programs with some focusing on social justice. If the state plans to do this, then do it right and follow the model completely.

Agency Response: As stated above, residency programs will go through the same approval process as any other new program submission. If the program is based at an IHE and is for college/university credit, the program would use http://www.arkansased.gov/public/userfiles/Educator_Effectiveness/Becoming_a_Teacher_or_School_Leader/1_Protocols_IHE_Programs.pdf. If it is an alternative provider and not for college/university credit, the program would submit using http://www.arkansased.gov/public/userfiles/Educator_Effectiveness/Becoming_a_Teacher_or_School_Leader/7_Protocols_Alt_Prep_Programs_rv1.pdf. The process allows programs to be innovative but still with oversight and meeting high standards.

The specific requirements for licensure under the Educator Career Continuum will be appended to these rules through the rules promulgation process.

With respect to teacher compensation, these rules do not address compensation as that is a school district function.

Name: Jacqueline Lovejoy

Date Received: November 13, 2017

Comment: I am writing in regards to ACT 294 of 2017. I am hoping that the committee will take action so that we may look at the best candidates for student learning. It was my

understanding this would be put in place in the summer/early fall. It is now almost the second semester of school. I hope that committee will seriously look at making a change that would best serve students.

Agency Response: The Department is proceeding as expeditiously as possible with the rules. However, the rules promulgation process is governed by law and by the rules of the Bureau of Legislative Research.