

## EPP Rulemaking Feedback

ALLRED, CATRON <callred2@cnm.edu>

Fri 4/20/2018 12:21 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

### EPP Rule Feedback

#### 6.65.3.7

G. Cooperating Teacher should be considered “**Effective**, Highly Effective or Exemplary.” Effective teachers with over three years of experience should be allowed to act as cooperating teachers for students.

#### 6.65.3.9

A. 2. There needs to be a provision for applicants with less than a 2.75 GPA to demonstrate competency in an alternative manner. For example, passing the NES Content Exam. This is especially crucial in Alternative Licensure Programs where an individual’s work experience has a larger impact on their content knowledge than a GPA. This should be an alternative, not a waiver subject to the 10% rule.

Thank you,

Catron Allred  
Director of Education Programs  
Central New Mexico Community College

## FW: Notice of Proposed Rulemaking

Rudys, Karen L <rudys@aps.edu>

Tue 4/24/2018 2:27 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

Dear Mr. Gonzales,

Please note the below concerns about the proposed rule.

Sincerely,

Karen

Karen Rudys  
Executive Director Labor Relations & Staffing  
Human Resources Department  
Albuquerque Public Schools  
505.889-4854  
505.889-4883 fax  
rudys@aps.edu

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**From:** Marjori Maddox Krebs [mailto:mkrebs@unm.edu]  
**Sent:** Monday, April 23, 2018 5:05 PM  
**To:** Rudys, Karen L <rudys@aps.edu>  
**Subject:** Re: Notice of Proposed Rulemaking

Hi Karen,

I have 2 concerns about this Rule:

1. Exemplary or Highly Qualified teachers to be cooperating teachers will be difficult to find in the numbers we need.
2. I am unclear on the requirement for university instructors to have "current teaching licenses."

I'm sure there are more, but these 2 jumped out at me.

Thanks,  
Marjori

Marjori M. Krebs, Ed. D.  
Associate Professor  
Department of Teacher Education, Educational Leadership & Policy  
University of New Mexico  
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Mailing Address:  
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Albuquerque, NM 87131

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**From:** Rudys, Karen L <[rudys@aps.edu](mailto:rudys@aps.edu)>  
**Sent:** Monday, April 23, 2018 4:41:02 PM  
**To:** Viola Florez; Trenia Walker; Marjori Maddox Krebs; Kathryn Watkins; Rebecca Sanchez; ellen Bernstein; Webster, Lori B  
**Cc:** Torgerson, Todd A; Blakey, Gabriella M  
**Subject:** Fwd: Notice of Proposed Rulemaking

All,

Please review the below proposed rule and let me know your thoughts.

Thanks,  
  
Karen

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**From:** Notification, Rule, PED <[Rule.Notification@state.nm.us](mailto:Rule.Notification@state.nm.us)>  
**Sent:** Wednesday, March 28, 2018 7:45 PM  
**To:** Notification, Rule, PED  
**Subject:** Notice of Proposed Rulemaking

### **NOTICE OF PROPOSED RULEMAKING**

**Public Hearing.** The New Mexico Public Education Department (PED) gives notice that it will conduct a public hearing in Mabry Hall located at the Jerry Apodaca Education Building, 300 Don Gaspar Avenue, Santa Fe, New Mexico

87501, on Tuesday, May 1, 2018, from 9:00 a.m. to 12:00 p.m. (MDT). The purpose of the public hearing is to receive public input on the proposed new rule 6.65.3 NMAC, Educator Preparation Program Accountability. At the hearing, the PED will provide a verbal summary statement on record. Attendees who wish to provide public comment on record will be given three (3) minutes to make a statement concerning the proposed rule changes. Written comment will also be accepted at the hearing.

**Rule Change Information.** The purpose of the proposed new rule is to improve and strengthen the preparation of day-one ready New Mexico educators by developing standard and transparent processes for the evaluation, review, and approval of educator preparation programs (EPPs) in the state. The rule provides a means for the PED to partner with all EPPs in the state. This will enable the PED to benchmark the productivity and accountability of EPPs to ensure that teachers are able and ready on their first day of instruction to positively impact student learning and development. The proposed new rule defines the requirements for EPP practices including: entry and exit requirements, clinical practice experiences, candidate observation, alignment with department standards, and submittal of data to the PED. Programs will be evaluated with both a comprehensive site visit review and a scorecard. The results of both the site visit review and the scorecard will be used to determine the program's status and will drive the continuous improvement of the EPP. The proposed new rule maximizes the amount of feedback and data the PED and EPPs receive, allowing both the PED and the EPPs the ability to assess the productivity and accountability of New Mexico's educator work force.

**The statutory authorizations include the following:**

**Section 22-10A-19.2 NMSA 1978** grants the department the authority to design a uniform statewide educator accountability reporting system for all public post-secondary teacher and administrator preparation programs in New Mexico including alternative licensure programs. No technical information served as a basis for this proposed rule change.

**Public Comment.** Interested parties may provide comment on the proposed new rule at the public hearing or may submit written comments, or both, to Jamie Gonzales, Policy Division, New Mexico Public Education Department, Room 101, 300 Don Gaspar Avenue, Santa Fe, New Mexico 87501, or by electronic mail at [rule.feedback@state.nm.us](mailto:rule.feedback@state.nm.us), or fax to (505) 827-6681. All written comments must be received no later than 5:00 p.m. (MDT) on May 1, 2018. The PED encourages the early submission of written comments. The public comment period is from March 27, 2018 to May 1, 2018 at 5:00 p.m. (MDT).

Copies of the proposed rules may be accessed through the New Mexico Public Education Department's website under the "Public Notices" link at

<http://webnew.ped.state.nm.us/bureaus/policy-innovation-measurement/rule-notification/>, or may be obtained from Jamie Gonzales at (505) 827-7889 during regular business hours.

Individuals with disabilities who require the above information in an alternative format, or who need any form of auxiliary aid to attend or participate in the public hearing are asked to contact Jamie Gonzales at (505) 827-7889 as soon as possible before the date set for the public hearing. The PED requires at least ten (10) calendar days advance notice to provide any special accommodations requested.

## Teacher Prep Programs

Dawn Bilbrey <dbilbrey@texicoschools.com>

Thu 4/26/2018 12:46 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

 1 attachment

TeacherPrepPrograms\_OpEd DB.docx;

Feedback

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## **Why Teacher Preparation Report Cards are Important to Public Education**

**By Dawn Bilbrey**

When I graduated from Eastern New Mexico University 18 years ago, I had no idea I was about to begin the most challenging yet rewarding experience of my life completely unprepared.

I have now been an English and history teacher for 17 years. I have a secondary education degree and a master's in education and I have nothing but great memories from the time I spent in my university's hallowed halls. However, while I fully knew my content areas of English and history coming out of school and stepping into the classroom, I was not adequately prepared for the day-to-day, year-to-year details that make up the art that is teaching.

On my first day as a teacher, as I walked into my first classroom at Hobbs High School, I was confident I was ready to be everything my students needed and more. But even with my carefully planned lessons in hand, I had no realistic idea about what to expect. Thankfully, Mrs. Funk, a masterful teacher in my school, took me under her wing and helped me to understand what being a teacher really means. Had it not been for Mrs. Funk, I would never have learned the finesse of balancing the many teacher responsibilities that define my daily professional life. And while I am beyond grateful for her insight, wisdom, and guidance, I can't help but feel that most of what she taught me during that first year should have been covered in my teacher preparation program.

I am now a level III teacher with an exemplary rating on my teacher evaluation, but it has taken me almost two decades to master all the skills necessary to create sustained success for my students. Teaching is hard work. It's a delicate balance of knowledge, organization, discipline, and counseling skills that are not typically taught, but are learned in the grittiness of daily toil with colleagues, parents, administration, and most importantly, with students.

Recently, college teacher prep programs have been taking the heat for graduating students with degrees but with insufficient preparation to be successful on day one in their classroom. Teaching, like many other highly-skilled professions that deal with daily person-to-person interaction, requires practice and training in how to navigate those relationships. That responsibility should not be left until the very end of the learning program for teachers. Clinical hours and/or practicum hours where interaction with students, administrators, and parents is being fostered and mentored should happen early on and throughout the educational teacher training program to best ensure understanding, knowledge, and success.

[Too many of brand-new teachers who enter K–12 classrooms across the nation aren't adequately prepared and ,any will teach the most at-risk students—with no clinical training in such a setting.](#) New teachers need to be ready to teach students on their first day, whether they receive that preparation in higher

education institutions or in alternative programs. The good news is that there's a growing movement to improve the way teachers are prepared for professional practice, and how colleges are preparing their education majors for classroom readiness.

The New Mexico Public Education Department will soon give report cards to the state's universities on their teacher preparation programs and rate their level of effectiveness. The universities will be scored each year in a variety of categories regarding teacher preparation for New Mexico's newest educators. This is an important step in the alignment of our state's educational system. Now, much like the teachers and schools in our state, universities will have evaluation data to use in determining what supports and revisions are most needed to effectively create day-one-ready teachers. These measures will result in a larger group of new educators who will be better prepared to serve New Mexico students in the classroom. If we continue to improve our educational system, at every level, new teachers like me will never walk into a classroom unprepared and students will never receive less than the very best we have to offer. We owe it to ourselves and our students to expect nothing less.

*Dawn Bilbrey teaches 8th grade ELA and US History at Texico Middle School. She is a Teach Plus New Mexico Teaching Policy Fellow.*



## Comments: Proposed New Rule 6.65.3 NMAC Educator Preparation Program Accountability

Amanda Romero <amromero@ad.nmsu.edu>

Thu 4/26/2018 1:48 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

 1 attachment

20180426 Comments on Proposed Rule on EPP Accountability\_PED.pdf;

Dear Ms. Gonzales,

Please find comments from NMSU's College of Education on the proposed new rule 6.65.3 NMAC Educator Preparation Program Accountability, attached.

All the best,  
Amanda

Amanda Leigh Romero  
Assistant to the Dean  
College of Education  
[amromero@nmsu.edu](mailto:amromero@nmsu.edu)  
575-646-5858

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## College of Education

Office of the Dean  
New Mexico State University  
P.O. Box 30001, MSC 3AC  
Las Cruces, NM 88003-8001  
575-646-5858

Date: April 26, 2018

To: Jamie Gonzales, Policy Division  
New Mexico Public Education Department  
[rule.feedback@state.nm.us](mailto:rule.feedback@state.nm.us)

From: Don Pope-Davis   
Dean, College of Education

Subject: Comments on 6.65.3 NMAC, Proposed Rule on Educator Preparation Program Accountability

Outlined below are our concerns and comments regarding the Public Education Department's proposed rulemaking for 6.65.3 NMAC, Educator Preparation Program Accountability.

### **6.65.3.7 DEFINITIONS:**

F. "Completer" means a candidate who earns a certificate or diploma from an educator preparation program approved by the department.

- Title II defines "completer" a bit more broadly: A program completer is a person who has met all the requirements of a state-approved teacher preparation program. Program completers include all those who are documented as having met such requirements. Documentation may take the form of a degree, institutional certificate, program credential, transcript or other written proof of having met the program's requirements. We use a completer report for this in Cognos that does not require students to have earned their degree (it's just a few that don't graduate immediately upon completing their coursework) that was put together by Advising and our predecessors to count the tallies for Title II based on their completion of all necessary coursework. If this is incorrect, we will include only those who have earned a BA, MA, or certificate moving forward.

G. "Cooperating teacher" means an educator who has earned a rating of highly effective or exemplary on the NMTEACH educator effectiveness system, is employed by a local education agency, is collaboratively selected by the local education agency and the educator preparation program, has at least three years of experience under the appropriate license, and is the primary evaluator of the candidate during their clinical experience.

- Do ALL of these need to be met to be a cooperating teacher? Will the state give us the rating data for every single possible CT for us to choose from so we can know this?

#### **6.65.3.8 APPLICATION PROCESS FOR APPROVAL:**

B. EPPs shall ensure that opportunities for clinical experiences are provided to candidates continuously throughout their enrollment.

(1) Clinical experiences shall begin upon the candidate's entrance into an EPP.

- Do they mean the EPP program specifically? For example, for us it would be junior year, or do they mean beginning at the institution as soon as they declare the education major?

H. In a form approved by the department, all EPPs shall annually submit candidate level data as agreed to in memoranda of understanding or associated amendments between the department and EPP providers. Failure to comply with data reporting and collection requests may result in revocation of the EPP's approval.

- This is the admissions and completers data – the MOU also states that PED has responsibilities in terms of timeline of getting the data validated and returned to the EPPs for their use for continuous improvement. This document should note PEDs responsibility to provide EPPs with their data according to the MOU they reference as well.

#### **6.65.3.11 EDUCATOR PREPARATION PROGRAM SCORECARDS:**

B. Scorecard metrics shall be:

(1) acceptance rate;

- Is this just the ratio of how many students apply to their teacher education program at the designated time during undergraduate studies? It will vary by program, even within NMSU – some EPP programs admit students as freshmen when they declare the major and have continuation requirements but not a formal application process (e.g. family and consumer sciences education) but our four programs in the College of Education have a formal application process around their junior year.

(2) diversity of cohort;

- What is this exactly? I liked the idea of using how well demographics of our cohorts match the demographics of the general region. In addition, is this diversity of both admitted and completed cohorts?

(8) employer satisfaction surveys.

- What about STEM teachers? Other high needs subjects like special education? Or, does “high needs areas” mean subjects? It looks like it means physical areas- like high needs districts, which need to be defined. Is this based on the poverty rate? Percent of students who qualify for free/reduced price lunch? All of these metrics also need to include how they are calculated since this is part of the definition.

#### **6.65.3.12 COMPREHENSIVE SITE VISIT REVIEW PROCESS:**

B. The comprehensive site visit review process shall include the following three elements:

(1) Self-evaluation. EPPs shall complete the self-evaluation documents in the EPP manual prior to the site visit. Documents shall be submitted to the department at least 12 weeks prior to the site visit. Documents shall include:

(a) quality review rubric;

- Has this been developed or validated?

#### **6.65.3.13 DETERMINATION OF EPP STATUS:**

C. Revocation.

- Is it possible to earn approval back after revocation? It does not look like it. Does this mean that Revocation = permanent shut down and no chance of ever gaining back the ability to admit and license students? No process is possible?

## No to the Public Education Dept. evaluating teacher education

Jennifer Brooks <jenniferwbrooks@gmail.com>

Thu 4/26/2018 7:53 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

The NM Public Education Department should not attempt to begin evaluating teacher education programs. The Department is led by political appointees. This will muddy the process. Evaluation should be done by professional educators, not politicians.

RECEIVED

APR 23 REC'D

APR 13 2018

## New Mexico Deans and Directors

Secretary of Education

Refer to Matt M.  
Becky K.

Christopher Ruszkowski  
Secretary-Designate  
New Mexico Public Education Department  
300 Don Gaspar  
Santa Fe, NM 87501

April 20, 2018

Dear Secretary Ruszkowski,

Over the last three years, the Deans and Directors and the NMPED have been committed to a collaborative process of program review, anticipating the opportunity to improve the quality of teachers working with K12 students as prepared by Provider programs. We understand that one component of program review will be the creation of the Provider scorecard based on constructs of performance identified by NMPED. The process committed to by NMPED and the Deans and Directors was designed to assure that there was sufficient time to review and verify components and metrics of the scorecard and their accompanying weights, validate data to be used for the scorecard, and identify cut scores which appropriately reflect the constructs of program review.

We were informed at the March 23<sup>rd</sup> meeting of the Deans and Directors the scorecard will be released the end of April. At this time, each Provider has not yet been able to verify the accuracy of data. Furthermore, the Deans and Directors were told the components and metrics for the scorecard were agreed upon at a meeting held in October 2017, which the attendees thought was just the beginning of discussions on the metrics. At this time, cut scores have not yet been agreed upon. We are concerned that expediting this process, speeding through the final steps without resolving the concerns of the Deans and Directors, will result in a scorecard that is inaccurate regarding a Provider's performance and will have little impact in terms of program improvement. It is key that the baseline being set now provides data which can be used to evaluate program improvement in the future, leading to true improvement and growth for our K12 students.

The Deans and Directors of the state's Educator Preparation Providers propose that the collaborative process we have engaged in with the NMPED should be allowed to continue. We support a soft release of the scorecard to each respective program in April. This would allow the institutions of higher education to provide direct feedback over a thirty day period for the scorecard. We understand that this is the same timeframe that is currently being proposed in pending regulatory review. Additionally, we would assert that this process will allow us to review the accuracy of the data, validate the data used for each component, set cut scores and address any further concerns before a public release in October as originally proposed. We believe that building on the collaborative process with respectful consideration to the time line that the NMPED verbally committed to has the potential to depoliticize the nature of this work and continue to support this endeavor, which appears to hold potential for improving Educator Preparation Programs across New Mexico.

Respectfully,

Penny Garcia  
Eastern New Mexico University



Don Pope-Davis  
New Mexico State University



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S. Hector Ochoa  
University of New Mexico



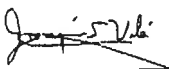
Virginia Padilla-Vigil  
New Mexico Highlands University



Catron Allred  
Central New Mexico Community College



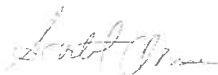
Joaquin Vila  
Northern New Mexico College



Michael Thompson  
San Juan College



Scarlet Clouse  
University of the Southwest



Dawn Wink  
Santa Fe Community College



## PED's involvement

D. I. <tdanielisaiah@yahoo.com>

Fri 4/27/2018 10:17 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

To whom it may concern,

PED does not need any more control or authority than they already have. That is what is wrong with our country, we as citizens, did not do our part to manage our government and they now have too much authority. We will not make the same mistake with our education system.

PED as well as other governing agencies on state and federal levels are making decisions and choices concerning education, curriculum and the way we teach from a fantasy world standpoint. They truly have absolutely no idea what we deal with from minute to minute in the classrooms. They have tied the hands of the education professionals and turned out education system into a numbers business ultimately resulting in producing more illiteracy, frustrated teachers who make it look right on paper and then do what they do best anyway.

If PED as well as state and government educational decision makers want to truly fix our education system then stop making decisions for us. Ask for our feedback. Sub in our classrooms 2 or 3 times a month in multiple grade levels. Find out what's really going and what we really do instead of the fancy shows that are put on for your visits. Get real teachers out of the classrooms to team together and fix education. That's how you fix the mess you have made.

We don't have uneducated or unprepared teachers. What we have is unrealistic expectations from an agency who has no idea what real education is all about. Back off and mind your own business and we will fix our states education problem.

Sincerely,

Daniel Isaiah

Sent from my iPhone



## Proposed new rule 6.65.3

Mark LaCelle-Peterson <m.lacelle.peterson@aaqep.org>

Sat 4/28/2018 12:59 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

The proposed framework for review of EPP Providers is concise in its presentation and thus leaves much to be determined. Were it to be adopted, the relative benefit derived from it will depend on the content of the rubric used to evaluate EPP Providers and the details of the self-study and site-review processes--particularly the evidence sources.

The rule helpfully focusses on the core outcome of educator preparation: completer ability to perform as an effective professional educator. This focus differentiates the proposed process from recent federal (USDE) and national (CAEP) efforts which have set their focus on distant measures (retention, job evaluations) which, while important, are available on only a fraction of completers and which are influenced by intervening and extraneous variables. The proposed framework shares the emphasis on performance measured at the point of program completion affirmed by the new quality assurance agency, AAQEP (the Association for Advancing Quality in Educator Preparation).

The size and role diversity of the proposed Certified Site Visit Teams will ensure that reviews include multiple perspectives on preparation and program performance. By stipulating teams that are composed wholly of New Mexico educators, the rule will diminish exposure to perspectives and expertise from other states. Were the PED to implement the rule in partnership with an agency such as AAQEP (which stipulates that it will operate in cooperation with state authorities in customizing arrangements within states), greater exchange of ideas and practices could be facilitated.

Finally, one gap created by the proposed rule ought to be considered. Quality assurance processes in US higher education (and quality control processes in general--see Baldrige Framework) have traditionally emphasized both accountability and improvement. The proposed rule addresses the accountability function directly and substantially; it provides less support for the improvement function and is silent on the related matter of innovation. PED might again consider partnering with a national quality assurance agency (such as AAQEP) to develop strategies for maintaining the emphasis on the accountability function while also supporting and facilitating improvement and innovation.

Best regards,

Mark LaCelle-Peterson, Ed.D.

---

Mark LaCelle-Peterson, Ed.D. // President and CEO // 585-298-1694

Visit our website at <http://www.aaqep.org/>

## concerns re: New rules 6.65.3

ROBIN TROUP <rtroup12@comcast.net>

Sun 4/29/2018 12:00 PM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

Hello NMPED staff,

I am writing in response to the proposed new rule for 6.65.3, Educator Preparation Accountability

I have been a licensed educator in NM since 1992, and my concerns are as follows:

### DEFINITIONS

#### **D. Clinical supervisor** - "both trained and certified in NM Teach"

With a new administration coming into office in January 2019, the quoted language is too specific. There is no guarantee that NM Teach will be the teacher evaluation vehicle. I would have it say something like, "a Level 3 teacher who is trained in the NMPED authorized teacher evaluation system."

#### **G. Cooperating teacher** - "means an educator who has earned a rating of highly effective"

Each NMPED training I have attended on the teacher evaluation system, it was emphasized that "effective" means a good teacher." It is not the equivalent of a grade of "C." A lot of factors outside of a teacher's control can influence his/her rating such as the student's primary language, socio-economic status, number of students in the class receiving special education services. I think the rule should be consistent with the NMPED training that emphasized "effective" is a very good teacher. If cooperating teachers have to be "highly effective," many communities will not have enough teachers who qualify to be a cooperating teacher. Also, very talented teachers move into NM and would be an excellent cooperating, can they be in that role if they don't have a NMPED evaluation from the prior year?

**I. "Day-one ready educator"** - Virtually no teacher is ready to the definition on day one of their teaching assignment. I suggest the language be tempered by something like, "the

teacher possesses a disposition to learn, grow, and develop as a teacher, so students are actively engaged in relevant curriculum and achieve measurable growth."

#### **J. Disposition - "...indicating capacity to be a day-one educator."**

It is completely unrealistic that new teachers will meet this rule's definition of a day-one educator." Instead. I suggest that you keep the language, "means the level of professionalism .... indicating capacity...to positively impact measurable student achievement."

#### **Q. NMTEACH educator effectiveness system - Components (1) - (5)**

The five components may change in less than a year, so they do not need to be listed because in Jan. 2019, there will be a new administration. Delete the language at the end of the definition to read, "....that measure teacher performance." Delete everything after the word performance.

#### **U. Revocation**

The explanation is vague. If someone is enrolled in a teacher prep program, it is an approved program. If approval is revoked, then the student's coursework for three previous semesters is not recognized? That is unfair to the teacher/student in the program. The timeline is off. If a program is in jeopardy of losing its approval, there should be an improvement plan, and all students enrolled in the program need to be notified, so they have the option to change programs.

#### **V. Scorecard**

I disagree with use of a scorecard. It isn't transparent, lacks detail, and appears politically motivated. Before this is included in a rule, it needs input from communities, and would need to include straightforward evaluation criteria that is easily replicated (i.e. reliable) and transparent.

#### **W. Theory of action**

This is so vague as to be meaningless. Say what you are alluding to in honest language.

### **6.65.3.9 EPP REQUIREMENTS**

**B. (1) "Clinical experiences shall begin upon the candidate's entrance into an EPP. "**

Although, I agree with candidates being placed in a clinical experience early in their EPP, the language in this rule is too prescriptive. "...upon the candidate's entrance into an EPP." Perhaps it should state something like, "...candidates will be placed in clinical experiences throughout their program, including an observation practicum in their first semester of the EPP."

**C. "...keeping families fully informed of their child's progress towards college-and-career readiness, on a regular basis, using objective measures in all subject areas."**

Do our licensed NM's teachers communicate progress towards college and career readiness on a regular basis? If you consider progress reports and report cards as this communication, then that should be specified. What exactly do you expect of the candidate? Phone calls, parent-teacher conferences, emails, report cards? What does this expectation look like?

**D. Partnerships between EPP and local community**

Is this the composition of the "Educator preparation program advisory board"? If not, it should be specified in the definition under K. If not, then what is the role of this group? It is too specific. Every EPP may not be able to have the participation of a superintendent, HR director, curriculum director. Each should be able to appoint a designee.

**6.65.3.11 EPP SCORECARDS**

As stated above, I disagree with use of a scorecard. As demonstrated by the scorecards that were recently sent to EPPs, the metrics are a mystery. For example, the diversity of the cohort should reflect that of the community in which the EPP serves. If the local community has a ratio of 60% people of color to 40% Caucasian, then the the expectation for diversity of cohort should reflect the same percentages. What about other measures of diversity, such as age, gender, etc.? This is just one example of how the metrics used need to be developed with input from stakeholders and not in isolation. They need to be fair and transparent. Currently, they are not. This is NOT something that should be imposed at the last minute prior to the exit of the governor.

**6.65.3.12 COMPREHENSIVE SITE VISIT REVIEW PROCESS**

The site visit classifications need to be developed with input from EPPs, school districts, charter schools, teachers etc. The five classifications are not defined in this rule, so they are arbitrary.

**B.4.(b)** Notifying candidates of an EPP being on probation for a 3rd year

**C.1.(d)** having 10 or fewer completers for at least two consecutive years

Both of these create a hardship for candidates enrolled in the program within 3 semesters leading up to the revocation. If candidates were notified of the probation status in the EPPs 2nd year, instead of at the beginning of the 3rd year, they can disenroll or transfer elsewhere without losing their credits.

If an EPP has its approval revoked simply because not enough students were enrolled, but it was approved while it operated, then the candidates should be exempt from not having their coursework recognized for the three previous semesters.

Finally, shouldn't programs under threat of revocation have the opportunity to appeal to the Secretary of Education just at charter schools have an appeal process when their charter is revoked?

Thank you,

Robin Troup

## Support

Patricia Martinez <pm101@abqse.org>

Mon 4/30/2018 8:08 AM

To:FeedBack, Rule, PED <Rule.FeedBack@state.nm.us>;

I am in support of the new rule to improve and strengthen teacher education in New Mexico. Day one ready educators will ensure that students will also be learning day one! Please support this new rule and support our future teachers in New Mexico.

Patti Martinez

Director of Special Education

Albuquerque School of Excellence

312-7711 ext 106