

Comment on proposed rule 6.65.3 NMAC , Educator Preparation Program Accountability

I am Dr. Dan Patterson. I have been a public school educator for more than 50 years. Education has been my life and my passion. I have been a teacher, coach, principal, assistant superintendent, deputy superintendent, superintendent and educational consultant in Arizona, Colorado and New Mexico. More than 30 of those years have been in New Mexico. I am also currently a regent at Eastern New Mexico University and the immediate past president of the New Mexico Higher Education Regents' Coalition. During my years as an active educator in New Mexico I have served on numerous boards, committees and taskforces for the Public Education Department. I believe this background gives me some level of credibility to speak on this issue.

It is obvious that by limiting our comments to three (3) minutes on six (6) pages of bureaucratic gobbledgook, the Department is just going through the motions and really doesn't want our input, but I'm going to give my opinion anyway.

1. In all my years of education this is one of the worst, most ridiculous regulations I have ever seen. It may even be the worst regulation I have seen come out of this department.
2. Since time is so short I will highlight just a few of my concerns – those that deal with four (4) of the eight (8) Scorecard Metrics found on page 4:
 - a. **DIVERSITY OF COHORT:** What exactly does this mean and how will it be evaluated? Anyone who knows the demographics of New Mexico recognizes that the four comprehensive universities get the majority of their students from their particular regions and that those regions have different demographics. Highlands and Northern get the majority of their students from the north, Western gets theirs from the west and southwest while Eastern gets the majority of their students from, that's right, the east. Would someone please tell me why the universities should be penalized because of the demographics of their regions?
 - b. **CANDIDATES' PERFORMANCE ON LICENSURE TEST:** Does it matter whether a graduate passes on the first or third time? Is it the university's fault that some students are not good "test takers?" Does this mean that someone who takes three times before passing the test is going to be a poor teacher? No! In fact they very well might be a better teacher because of this because they will have a better understanding of the fear their students may have in taking tests. It also shows that they are persistent in going after success!
 - c. **HIRING AND RETENTION RATES FOR COMPLETERS TEACHING IN NEW MEXICO:** What exactly does this mean? Does it mean how many graduates get jobs and stay in New Mexico as opposed to leaving the state? If so, this fails,

once again, to recognize the demographics of a university. For example, Eastern is located within a few miles of Texas and we get a large number of students from there. These students generally have every intention of returning to Texas to teach where they can generally earn \$10,000 more. Also, Cannon Air Force base is in our back yard. Students from there have no idea where they or their parents will have their next duty station.

As for retention rates, what impact can the university possibly have on that? That is the responsibility of the individual school and school district as well as financial considerations. If the school is not a good place to work, teachers are going to leave. If the teachers need to make more money, they are going to quit. These are not university problems, they are district and state problems.

- d. **DISTRIBUTION OF COMPLETERS IN HIGH NEEDS AREAS:** Again, what does this mean and what can the university possibly have to do with this? Does it mean high need schools and districts or high need teaching areas? Teachers often have no choice *where* they will teach. That is often determined by where the spouse works, familial ties and the desire to live in a particular area where they are offered a job. If it means a high needs teaching area such as math, science or special education the university can have a limited impact on this.
3. **REVOCATION OF PROGRAM APPROVAL:** The idea that the PED (ie. Secretary) can revoke the approval of a program under another equal department (HED) is blatantly ridiculous and maybe even unlawful. The ideal solution is to actually work cooperatively in program review, not simply give lip service to it.
4. Finally, for this public input portion, The Deans of higher educations institutions have written a letter to the secretary, indicating that they have been working collaboratively with the Public Education Department for the last three years to improve the quality of education, but that that process has not been completed, and that the Department is not following the timeline to which it had earlier committed.
 - a. In the case of Eastern, we have been informed that the data being supplied by the Department is grossly inaccurate and that the scorecard being presented will be inaccurate.
5. I have a number of other concerns in addition to those listed above:
 - a. **UNDERGRADUATE GPA OF 2.75.** While it is nice to have a great GPA, a GPA does not determine a person's potential for success. I have, through the years, seen graduates with lower GPA's turn into fantastic teachers. If a student's GPA is good enough for him/her to graduate, that student should have the opportunity to pursue a career in his/her chosen field, not be denied that opportunity because of

some arbitrary entrance requirement. Youngsters grow up! Don't predetermine a potential for success because of some arbitrary undergraduate grades. There are many more important qualities an outstanding teacher should possess than undergraduate grades. Just consider one example: A youngster that has two terrible college years, goes into the service, returns to school after maturing and has two good years but not good enough to increase his GPA.

I have hired hundreds of teachers over the year and have never been concerned about their GPA's. I am more concerned about their ability to motivate students, help students to achieve to their maximum abilities.

- b. **COMPREHENSIVE SITE VISITS:** This rule calls for a site visit every four years. This will become a bureaucratic millstone for both the Department and the institution. The Department is already spread extremely thin trying to stay up with oversight of the state's 89 school districts and ever-increasing number of charter schools. It also imposes an additional unnecessary burden on the institution regarding data collection and visitation preparation. Institutions of higher education have suffered significant funding decreases over the past few years and such additional requirements are excessive and unnecessary, afterall, these institutions already undergo extensive review from NCATE or CAEP. I realize that Secretary Ruszkowski believes these accrediting agencies are inadequate, but I believe he is ill advised on this matter.
- c. **TEACHER SHORTAGE:** I believe that one of the major concerns facing our state educational system today is the shortage of teachers and that PED needs to put forth a concerted effort to solve this problem. I have had discussions with numerous superintendents about this issue and they are in agreement with me. I would be happy to help form a taskforce to work with the PED in addressing this issue.

Respectfully Submitted,



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Interim Secretary Ruskowski:

The Coalition for the Majority strongly opposes the Proposed New Rule 6.65.3 Educator Preparation Program Accountability for the following reasons:

1) The statutory authority: Section 22-10A-19.2 Educator accountability report, includes no authority regarding Probation nor Grading of Educator Preparation Programs that the proposed new rule includes. The PED's proposed new rule over-steps its authority.

2) The PED again failed to consult all affected stakeholders. Regents, Deans, and faculty were not adequately informed of the Proposed Rule. While Deans and faculty were aware of the proposal to evaluate Colleges of Education, the PED failed to inform them and the public of the criteria by which COE's would be evaluated.

3) The proposed inclusion of data from the past 3 years is also troublesome. Given that the PED knew that this data would be used, they had the obligation to inform stakeholders in a timely fashion. Evaluation experts agree that in order to conduct any kind of assessment, stakeholders must be informed before any evaluation takes place so that they can prepare adequately. A one-month time frame which the PED has announced, with a May 29, 2018 closing date is at best disrespectful, if not underhanded.

4) Evaluating Colleges of Education on criteria that is out of their control is irresponsible. Whether graduates leave the state for better paying teaching jobs, or decline to teach in rural, or hard-to-fill school districts says more about the educational climate that the PED has created with its constant criticism of teachers, and its controversial NM Teach evaluation system. Who will hold you accountable for that?

5) There is reference in 6.65.3.12 of the Proposed New Rule to a "certified review team" who "shall conduct the site visit and review the EPP using the quality review rubric ... (and) shall debrief the site visit with the EPP..." Who is this "review team" and who will determine if they are qualified and "certified?" There is no person in the PED with the expertise in teacher education who could organize and certify the review team.

6) How is all this activity being funded? Will the PED bring in another out-of-state organization and pay them for this work, despite the fact that there is a national organization (CAEP) that already does this? Who in the PED has the expertise to disqualify a national organization that has been certified by national experts? This proposed review team, and the funding that will be needed is an irresponsible use of education monies.

To conclude we believe that the grading of our public schools and the flawed evaluation of teachers, has served to demean, divide and demoralize. Your proposed rule only serves to create these problems in higher education.

Members of the Coalition for the Majority:



National Education Association - New Mexico

Great Public Schools Begin With Us!

Betty Patterson
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Testimony of NEA-New Mexico Regarding 6.65.3 NMAC, Educator Preparation Program Accountability

NEA-New Mexico believes 6.65.3 NMAC, Educator Preparation Program Accountability is ill-conceived and needs to be completely rewritten in a transparent process with participation of all stake-holders with an interest in educator preparation in New Mexico.

The “Program Approval and Reporting Process for Educator Preparatory Programs” states that it was created by the “Professional Practices & Standards Committee. We know of no such body and wonder when it was created and who it is comprised. NMAC 6.2.8 requires that a Professional Practices & Standards Council be appointed and maintained. One of its four subcommittees is an educator preparation committee comprised of three currently licensed teachers or instructional support providers; one currently licensed school administrator; and one professional educator associated with a university, college or post-secondary department of education that offers educator preparation programs. One wonders if this apparently dormant council has returned to life with a new name, but no new rule to set out its composition or duties.

Placing New Mexico’s flawed system of teacher and administrator evaluation in yet another evaluation system simply perpetuates a mistake that has already decimated teacher morale in New Mexico. The use of “effectiveness rating of completers, as measured by NMTEACH” in the new educator preparation program scorecards is compounding an already bad situation.

NEA-New Mexico as well as NEA nationally continues to support the partnership approach of state partnerships with the Council for the Accreditation of Educator Preparation (CAEP). CAEP currently has agreements with 34 states for a state and national partnership approach to educator preparation accreditation. CAEP is the only national teacher preparation accreditor recognized by the Council for Higher Education Accreditation. States sign agreements with CAEP because a national process prevents bias, provides screening and training of reviewers, and keeps the state apprised about educator preparation trends around the country.

NEA-New Mexico strongly recommends that this proposed rule be placed on hold until a transparent collaborative process can be created that includes a state-national partnership with CAEP.

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