

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
Phone: 505-277-0602
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Email: mkrebs@unm.edu
Mailing Address:
1 University of New Mexico
MSC 05 3040
Albuquerque, NM 87131

From: Rudys, Karen L <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

From: Notification, Rule, PED <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, 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
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

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 23 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 23rd 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



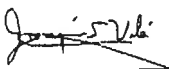
Virginia Padilla-Vigil
New Mexico Highlands University



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

Council for the Accreditation of Educator Preparation

CAEP Assistant to the President <Assistant@caepnet.org>

Mon 4/30/2018 12:19 PM

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

 1 attachment

GonzalesJ NM 180430.docx;

Please see the attached letter.

Sincerely,

Chris Koch

Aaron J. Adkins | *Interim Executive Assistant, Executive Office of the President*

202.753-1642 Direct caepnet.org

202.223-0077 Main @caepupdates

1140 19th St N.W. | Suite 400 | Washington, D.C. 20036



Excellence in Educator Preparation Accreditation

April 30, 2018

Jamie Gonzales
Policy Division
New Mexico Public Education Department
Room 101
300 Don Gaspar Ave.
Santa Fe, NM 87501

Dear Mr. Gonzales:

Thank you for the opportunity to provide comment about educator preparation in New Mexico. I am Christopher Koch, President of the Council for the Accreditation of Educator Preparation (CAEP). I have been serving in this role since 2015, and spent the previous eight years as State Superintendent of Education in Illinois. During my tenure, I implemented many reforms with teacher and administrator preparation to ensure candidates have the skills and knowledge to serve effectively in those roles before they enter the classroom.

I was drawn to apply as President of CAEP because I had worked on the Commission, developing rigorous accreditation standards that mirror those NM is seeking: content expertise, clinical experience, selection, retention and recruitment, learning outcomes for K-12 learners and continuous improvement. CAEP's goal is to help better prepare teachers to come into the classroom on day one and begin to immediately make a difference for our K-12 students.

CAEP was formed in 2013 by the merger of the National Council for the Accreditation of Teacher Education, founded in 1954, and the Teacher Education Accreditation Council, in 1997. There were a variety of reasons for the merger, including to dispel criticism regarding quality in that all accredited Education Preparation Providers (EPPs) meet the same high standards. Experts in the field of educator preparation felt that having multiple standards for educator preparation would mean some institutions would produce lower quality candidates. That problem has been solved with the creation of CAEP, where all EPPs use the same rigorous standards and processes. In fact, the boards of both NCATE and TEAC felt so strongly about the need for a single, nationally recognized accreditor they voted their respective organizations out of existence.

CAEP was designed to facilitate common purpose, improve the accreditation of teacher education, help unify the profession, convince the skeptical that the accreditation of all programs is an

essential ingredient in building the teaching profession, introduce economies of scale, build consensus around one set of standards for quality and the evidence needed to meet those standards, and ultimately confer on teaching the benefits accreditation bestows on other professions.

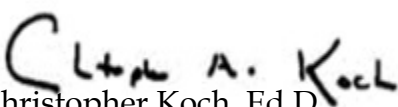
As a former chief state school officer, I understand the impact educator preparation has on our K-12 students. CAEP standards are more rigorous than their predecessor standards. They are based on evidence of what is most impactful to successful teaching: content expertise, clinical experience, learning outcomes for K-12 learners and continuous improvement. Higher education deans and faculty from across the country worked alongside those who license teachers, those who hire teachers and teachers themselves to develop meaningful standards for CAEP.

CAEP currently has agreements with 34 states for how we approach accreditation. CAEP is the only national teacher preparation accreditor recognized by the Council for Higher Education Accreditation. Further, our standards are outcome based, holding higher education accountable in the same way that our K-12 schools are held accountable. Many states sign agreements with CAEP because a national process prevents bias, provides screening and training of reviewers, and allows for customization in terms of services. Reductions to state education agency budgets also are a factor, as CAEP already has the infrastructure and staff in place which may save personnel costs for states.

The CAEP accreditation cycle is currently seven years, the industry standard. This means a site visit and self-study report are conducted at least every seven years. However, as part of the continuous improvement component of our process, CAEP requires an annual report in which an EPP must update on the status of their progress. We have had previous inquiries on a reduced cycle of accreditation, such as the four-year cycle proposed in New Mexico rules and could accommodate this cycle, however we should note that this would drive up expenses for EPPs.

I would welcome the opportunity to discuss the CAEP accreditation process with representatives of New Mexico so I may further discuss the advantages of a State Partnership Agreement with CAEP.

Sincerely,


Christopher Koch, Ed.D.
President

AFT New Mexico Written Feedback re: NMAC 6.65.3

John Dyrzcz <john@nmaft.org>

Mon 4/30/2018 3:17 PM

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

Cc:Stephanie Ly (AFTNM) <stephanie@nmaft.org>; Kathy Chavez <katc8601@gmail.com>; Bernstein, Ellen <ellen@atfunion.org>; Crone, Tim <tcrone@cybermesa.com>;

 1 attachment

4.30.18 PED Public Comments NMAC 6.65.3.pdf;

Ms. Gonzales:

Please find attached a PDF of written comments regarding the New Mexico PED's proposed rule changes regarding *Teacher Preparation Program Approval Process and Accountability, NMAC 6.65.3*, submitted on behalf of the 23,000 public educators represented by the American Federation of Teachers New Mexico.

If you have any questions or concerns, please do not hesitate to contact.

Best,
John Dyrzcz
AFT NM

--

John Dyrzcz || State Affiliate Political Organizer, AFT-NM
505-554-8679 || 530 Jefferson Street NE, Albuquerque, New Mexico 87108

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April 30, 2018

Jamie Gonzales, Policy Division
NM Public Education Department, Room 101
300 Don Gaspar Avenue,
Santa Fe, New Mexico 87501

Re: *"Teacher Preparation Program Approval Process and Accountability"*

Ms. Gonzales:

Please accept the below comments on the proposed new administrative Rule 6.65.3 NMAC, "Teacher Preparation Program Approval Process and Accountability":

AFT New Mexico is deeply concerned with proposed NMAC Rule 6.65.3 as it constitutes an overreach of Departmental authority in the accreditation of New Mexico colleges and university teacher preparation programs, as well as once again relying on faulty and discredited approaches to evaluations and rating systems for our public schools.

First, the desired implementation by the New Mexico PED of a system of ratings and 'accountability' for New Mexico teacher preparatory programs, in our opinion, seeks to undermine and invalidate existing methods of college and university accreditation processes. We feel that existing processes for earning accreditation through the National Council for Accreditation of Teacher Education or the Council for the Accreditation of Educator Preparation is sufficient and should not be discarded in order for the NM PED to implement a localized scheme of accreditation. It is our firm belief that national accreditation – and not local – is a better way to not only establish benchmarks, but also ensure that New Mexico programs are following national standards and trends for these programs.

We, like the NM PED, want to ensure that our colleges of education are of high quality, producing educators who are ready for public instruction in New Mexico schools, but we feel that moving towards a localized system of accreditation and ratings is a step in the wrong direction, would prove incredibly disruptive to educational instruction already in progress at our colleges of education, and also would not be immune to the whims of changing administrations in Santa Fe, the next being in 8 months time.

Second, we have deep misgivings that the proposed rule is modeled on current formulas and algorithms that are being used to grade and label our K-12 public schools and educators. Such systems have been proven time and again to be faulty and irreparably flawed, and we question the wisdom of instituting these approaches on yet another set of institutions in New Mexico. By aligning these proposed scorecards and ratings systems to the existing NM PED framework, we believe it is an attempt to enshrine a poor and destructive system long after this current administration has left Santa Fe, and the damage to the reputations and quality of New Mexico's colleges of education could be widespread, further exacerbating our current and historic teacher shortage in New Mexico public schools. In short, we believe this proposed rule is a solution in search of a problem.

Finally, we find it troubling that while this rule is currently in the process of receiving public and stakeholder feedback, it appears as though the NM PED is already laying the groundwork for implementing the rule, even though it has yet to be enacted, leading us to question the transparency and authenticity of the entire feedback process.

As by the Legislative Education Study Committee, during a March 2018 meeting of college deans and directors, the NM PED shared that initial scores would be released for FY 15-17, but would not be used in a punitive manner, and that a second scorecard would be released in October of 2018, which would then be used to determine whether the NM PED would seek to implement punitive measures on a particular college of education, including the revocation of program status.

This is deeply concerning on many fronts, however, in particular, we share similar concerns with participants in the deans and directors meetings that NM PED has developed these scores in great secrecy, and specifically that:

- Cut scores have yet to be developed, established, or finalized;
- Not all programs have not yet received data which it to be included in the scorecard;
- Programs have not been afforded time to validate data; and,
- Data with errors have been found in reports from the NM PED

We sincerely hope you will take these deep concerns into consideration as you begin to reflect on the feedback you are receiving from stakeholders on these proposed changes. It is our firm belief the NM PED has the ability and obligation to respond in a meaningful way to this feedback and relent from this proposed course of action.

Finally, on behalf of thousands of New Mexico's public educators, we are again disappointed that proposed changes to NM PED rules continue to be scheduled during the workday and during the school year. We believe this scheduling practice disenfranchises educators who are directly impacted by these proposed decisions, and we urge future hearings be scheduled when education professionals are readily able to attend.

Sincerely,

Stephanie Ly
President, AFT NM

Tim Crone
Vice President for Higher Education, AFT NM

Kathy Chavez
Executive Vice President, AFT NM

Ellen Bernstein
President, Albuquerque Teachers Federation

Proposed New Rule EPP Accountability

salazarlc <salazarlc@plateautel.net>

Mon 4/30/2018 4:40 PM

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

 1 attachment

Proposed New Rule EPP Accountability.docx;

Attached please find letter regarding this Proposed new rule.

Thank you.

May 1, 2018

Interim Secretary Ruszkowski:

I **strongly oppose** the Proposed New Rule 6.65.3 Educator Preparation Program Accountability for the following reasons. The statutory authority: Section 22-10A-19.2 Educator accountability report, states nothing regarding neither Probation nor Grading of Educator Preparation Programs which the proposed new rule includes. Clearly, the PED's proposed new rule goes beyond said statute, thus over-stepping its authority.

Furthermore, the PED again failed to consult all affected stakeholders. Regents, Presidents, Provosts, Deans, and faculty were not adequately informed of the Proposed Rule. Merely posting it on the PED website is insufficient to assure clear understanding of its impact. Higher education leaders, including Regents, Presidents, Provosts, Deans, and faculty were not duly advised of various punitive elements of the proposed rule, which by the way, are in effect on May 29, 2018. PED is aware that the latter half of any college or university semester is an excruciatingly busy time, but still chose this time when higher education professionals might be caught "off guard."

Also, 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 how is it "certified?" How is all this activity being funded? Or, will this prove to be an unfunded mandate?

This proposed new rule disregards national accrediting organizations such as NCATE and CAEP. Once again, the PED seeks to alienate and add to the mistrust that already exists with the very professionals who serve our New Mexico students.

The grading of our public schools, often viewed as a flawed assessment, has served to demean, divide and demoralize. Now you propose this malady be extended to higher education? Shame on you!

In sum, I underscore and reiterate strong opposition to the Proposed New Rule!

Loretta C. Salazar, Ph.D.

Loretta C. Salazar, Ph.D.

Emeritus Assoc. Professor of Education,

New Mexico Highlands University

Testimony from Jill Hutchinson-Bass

Jill Hutchinson-Bass <jillhutchinsonbass@gmail.com>

Mon 4/30/2018 4:50 PM

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

 1 attachment

Jill's EPP Testimony.pdf;

To whom it may concern,

I would like to testify at the rule hearing tomorrow but I'm unable to leave my class.
Hope Morales, NM Teach Plus Director, suggested I send you my testimony.
Please see attached.

Thank you,
Jill

--

Jill Hutchinson-Bass
Carlos Gilbert Elementary, SFPS
National Board Certified Teacher
Teach Plus Fellowship
Teacher Leader Network Liaison

I am a proud Aggie! As a native New Mexican I graduated from New Mexico State University in 1991, the same university my paternal grandparents graduated from as teachers in the 1920's. Although it took me five years to decide on a major and get my bachelors degree in education, I didn't quite feel prepared and wanted more education.

So, I am also a proud Lobo! I immediately attended the University of New Mexico upon graduating from NMSU and received my masters in Curriculum and Education. Still, I struggled as any new teacher would, starting out with such little time in the field. I wouldn't say I was unprepared but I'm sure it would have helped to have a more supportive and rigorous program. New Mexico Public Education Department would undoubtedly benefit potential teachers if they could grade university Education Preparation Programs. There are definitely some benefits to having this put in place and I believe it warrants consideration.

One benefit is transparency. If I were beginning my career at a young age I would appreciate the transparency that NMPED is offering with the EPP grading system for state universities. Having attended two universities in New Mexico, I would have liked this information before hand. Being able to compare university program grades would have been a factor in my decision-making for school choice and paying parties deserve to have that important data disclosed. Students should be able to invest in the institution that has the most reputable education program! As a parent of two boys entering high school, I looked at school grades to help with my choices. Why wouldn't we afford that same luxury to university students making life-long decisions and committing to years of debt?

Another benefit is quality. Healthy competition improves quality. Grades could help strengthen the education programs we already have in place and make New Mexico universities a more competitive market nation wide. The [Albuquerque Journal's](#) recent article stated that "Right now, teacher preparation programs are being reviewed by national accrediting bodies like the National Council for Accreditation of Teacher Education or the Council for the Accreditation of Educator Preparation." This may be so but there is a very disturbing fact stated in another [Albuquerque Journal](#) article, that New Mexico is the second highest in teacher turnover in the nation! Clearly teachers are unprepared and the national accrediting bodies have not proven effective in New Mexico for teacher retention. I can personally testify that some of the turnover I've witnessed is directly related to teachers being unprepared, overwhelmed, and under paid. The NMPED university grades could be the catalyst to move our state forward and I commend them for looking at viable options. Why wouldn't we want to improve educational programs for any of our students? If it's done for elementary, middle and high school, it can be done for the College of Education as well. Through accountability we gain credibility.

Having taught overseas for 15 years at private international schools, I have had the opportunity to compare my pedagogy to other teachers from the US and around the world. There have been many noticeable differences. As a veteran teacher, my young colleagues coming from other states seem much more prepared than I was when I

started and they only had a couple of years experience. I'm not certain why this outcome is true but can speculate that more populated states breed more competitive programs, which raises the standard. Grades could be a solution and need to be considered.

I support the rule proposal that will monitor universities are doing the best job that they can for potential teachers! We need universities to be accountable for preparing teachers in order to retain and recruit the finest educators during this national teacher shortage crisis. This could impact all stakeholders in NM, which is especially important to students, families, and communities.

"Exceptional programs equal exceptional teachers!"

Jill Hutchinson-Bass

RE: Educator Prep Rule

Lopez, Michelle <michelle.lopez@jalnm.org>

Mon 4/30/2018 8:29 PM

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

Cc:Kappus, Becky, PED <Becky.Kappus@state.nm.us>; Duran, Alicia, PED <Alicia.Duran2@state.nm.us>; Rivas-Savell, Isaac, PED <Isaac.Rivas-Savell@state.nm.us>;

I graduated magnum cum laude from the University of the Southwest in Hobbs, NM, with a Bachelors in Elementary Education in May of 2000. At the time, I believed that the university had prepared me to step into a classroom and begin teaching effective curriculum to engaged, well-behaved students in an organized and functional classroom. I was ready to change the world one student at a time. I was equipped with plenty of theoretical notes, educational journal summaries, interactive bulletin board ideas, a well stock activity/sponge box, a degree, and a teaching license. I was so wrong! The first year of my teaching career was paved with many, many tears because I was frustrated and confused. I spent long hours each night and during weekends redoing and rethinking classroom procedures, processes, and subject resources. I had no guidance from the university, colleagues, or administration. I discovered that I was not prepared for the journey I was taking. Several times throughout my first 3 years as an educator, I wanted to quit. But my passion to work with kids and to overcome difficult situations pushed me to continue. Move on to 18 years later, I have worked at four different districts with students from grade 2 to 8. I have been a mentor teacher 8 times throughout my career and have worked with 2 student teachers. I have worked with several young teachers that quit their first year because they were not prepared to do their job.

Educators are required to obtain a degree, which is not free or easy, then step into a classroom and be evaluated through classroom formal observations and student testing data, yet the university or college is not held accountable for their part in the process? If that's the way it is then just give teachers new teachers and pay us to teach and prepare the new teachers. The truth is that is what is happening. New teachers are being mentored and taught: how to read, evaluate, and de-construct standards; create and reflect effective lesson plans; apply differentiated strategies for various learning styles in all subject matter; classroom management strategies and methods, etc. by their mentor or cooperating teachers. It is time that the universities revamp their programs to prepare day-one ready teachers. Educators pay for their degrees and deserve to be adequately prepared.

Sincerely,

Michelle Lopez

5th grade Teacher Jal Elementary

STA Member

Jal Elementary Teacher Liaison

Mentor Teacher

SAT Coordinator grades 3-5

18 years in Education