

[EXT] Alternative Licensure/Teacher Preparation Programs

Caroline Marrufo <cmarrufo@lcps.net>

Tue 6/25/2019 11:21 AM

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

In regards to Teacher Preparation Programs, there should be a required semester long class on How to Teach Reading for any individual going into the teaching field regardless of grade level. This class should include identifying and working with students who have dyslexia dyslexia and other reading disabilities. Every teacher should be given the tools to identify struggling readers, as well as how to help them.

Classroom management and differentiation should be integrated into Teacher Preparation Programs.

Student teachers should be given more responsibility sooner when in the classroom. Before their last semester of student teaching, student teachers should be comfortable doing Read Alouds with Accountable Talk.

Individuals on Alternative Licensure should be given much more support from their learning institution, the state, and the district. I've seen too many individuals on alternative licensure leave the profession due to the lack of support.

Districts need a stronger mentorship program for beginning (year 1-3) teachers and those on Alternative a licensed.

Respectfully,

Caroline Marrufo

Teacher, University Hills Elementary

Las Cruces Public Schools

[EXT] Proposed NMAC 6.60.3

Garcia, Penny <Penny.A.Garcia@enmu.edu>

Tue 6/25/2019 3:53 PM

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

I note that as the rule currently is written, only students from an alternative EPP pathway are required to “pass all department-approved New Mexico teacher assessments within two years” (6.60.3.9B5). That is not listed as a requirement for the alternative educator effectiveness pathway (6.60.3.9C) or the alternative post-secondary experience pathway (6.60.3.9D).

Penny A. Garcia, PhD

Dean, College of Education & Technology

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[EXT] Public Comment on Proposed Rule 6.60.3.11

Sheri Williams <ssw@unm.edu>

Wed 7/17/2019 2:38 PM

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

 2 attachments

Public Comment Proposed Rule 6.60.3.11.docx; Public Comment Proposed Rule 6.60.3.11.pdf;

Dear John Sena, Policy Division, New Mexico Public Education Department,

Attached please find my public comment on the proposed repeal and replace of **6.60.3.11 for Alternative Administrator Licensure.**

Note: I am attaching the document as both a doc. and pdf. for your convenience in uploaded my comments to the site.

Thank you for your consideration.

Kind regards,

Dr. Sheri Williams

Preparing next-gen leaders to bring about change in schools & communities

Dr. Sheri S. Williams | Associate Professor | Educational Leadership Program | TEELP Department | UNM College of Education | Hokona Hall 380 | Mail Stop Code: MSCO5 3044 | Dept. Ph. 505-277-0504 | Dept. Fax: 505-277-0455 | Mailing Address: Hokona Hall 118, 1 University of New Mexico, ABQ, NM 87131



July 17, 2019

Dear New Mexico Secretary of Education Dr. Karen Trujillo,

Thank you for the opportunity to comment on the **Proposed Rule 6.60.3.11** for Alternative Administrator Licensure. I write as an Associate Professor in UNM's Educational Leadership Program and as a member of an expert panel which launched an [advocacy campaign](#) in September 2018 to ensure the preparation and certification of quality school leadership in New Mexico.¹ I respectfully propose three actions to address major concerns in the Proposed Rule: 1) refresh the administrator standards, 2) increase the internship requirement, and 3) change the verification requirement from employer to a licensure exam.

- 1. Refresh the Administrator Standards:** New Mexico is compelled to update its outdated standards for administrator licensure as last adopted over 20 years ago in 1998 in the N.M. Admin. Code 6.62.2.10. Refreshed standards are urgently needed to align with the nationally recognized school leadership standards as codified in the [2015 PSEL](#) and the [2018 NELP](#) program standards.² New Mexico's administrator standards place limited emphasis on preparing candidates to respond to higher expectations for improved student outcomes and to meet the ruling in the Yazzie/Martinez lawsuit. Refreshed standards can and should drive all other systems; i.e., leader preparation, licensure, evaluation, and professional learning. New Mexico refreshed its teacher standards in 2017 with the adoption of InTASC. It is well past time to refresh the 1998 standards for administrators who are second only to teachers in their shared responsibility to transform education.³
- 2. Increase the Internship Requirement:** The internship requirement of a scant 180 hours for alternatively prepared candidates is insufficient to move New Mexico out of its 50th place in education. According to the [2018 report](#) from the Education Commission of the States, New Mexico requires the lowest number of internship hours.⁴ In order for alternative candidates to be ready to integrate the professional pedagogy and the specialized knowledge and skills in educational leadership, they will need more than 180 hours of intensive clinical and/or field experience throughout one full school year, including responsibilities at the start and end of the school year.
- 3. Change the Verification Requirement:** In order to certify alternative candidates' readiness to lead in New Mexico's multifaceted and diverse school environments, alternative candidates need to demonstrate their competencies by taking and passing a rigorous and research-based exam that is aligned to refreshed standards. It is doubtful whether employers possess the knowledge to verify that alternative licensure candidates have met administrator standards during the internship. Employers tend to be motivated by their own needs to certify applicants who meet job-specific competencies which typically do not align with professional leadership standards.

Sincerely,

Dr. Sheri Williams, Associate Professor, UNM Educational Leadership Program, ssw@unm.edu

¹ [Ensuring Quality School Leadership](#) for Improved Student Outcomes: Testimony before LESC Sept. 27, 2018

² Definitions – [PSEL Standards](#): The Interstate School Leaders Licensure Consortium (ISLLC) Standards are nationally recognized school leadership standards first developed in 1996 and revised in 2008 and 2015. The 2015 version of the standards was renamed Professional Standards for Educational Leaders (PSEL). [NELP Standards](#): The Educational Leadership Constituent Council (ELCC) Standards are nationally recognized educational leadership program standards. These standards were revised in 2018 and renamed The National Educational Leadership Preparation (NELP) Program Recognition Standards.

³ According to the [2018 report](#) from ECS, 13 states have already adopted the new national standards, namely, AZ, AR, DE, ID, IL, MD, MI, NJ, NY, ND, RI, VT and WY.

⁴ Hours for the Internship vary from a low of 180 in New Mexico to a high of 750 in Georgia with an average of around 300 hours (180 – NM, 216 – MT, 250 – NE, 300 – CO, MS, NJ, RI, and VT, 320 – MN and VA, 360 – PA, 400 – IA, 450 – UT, 500 – MA, 540 – WA, 600 – DE, 750 – GA). The top-rated states in education typically require 300 or more internship hours. Note: No hour requirement was recorded by other states in the [2018 ECS report](#).

[EXT] EPP and Alternative Licensure feedback

ALLRED, CATRON <callred2@cnm.edu>

Wed 7/24/2019 3:03 PM

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

 2 attachments

6.60.3_Alt Licensure-proposed strikethrough_web_CNM Comments.docx; 6.65.3_EPP-proposed strikethrough_CNM Comments.docx;

Please see the attached comments regarding the Alternative Licensure and EPP rules. I have listed them as comments on the side of the document. If this format is not acceptable, please let me know and we will send our comments in another format.

Thank you,

Catron Allred
Director of Education Programs
Central New Mexico Community College



Are you prepared for the course names and number changes this fall?
Learn more about Common Course Number Changes: www.cnm.edu/ccnc

TITLE 6 PRIMARY AND SECONDARY EDUCATION
CHAPTER 60 SCHOOL PERSONNEL - GENERAL PROVISIONS
PART 3 ALTERNATIVE LICENSURE

6.60.3.1 ——— **ISSUING AGENCY:** Public Education Department, herein after the department.
[6.60.3.1 NMAC — Rp, 6.60.3.1 NMAC, 11/27/2018]

6.60.3.2 ——— **SCOPE:** Applicants for alternative teaching licensure alternative administrative licensure, or student success advisor licensure.
[6.60.3.2 NMAC — Rp, 6.60.3.2 NMAC, 11/27/2018]

6.60.3.3 ——— **STATUTORY AUTHORITY:** Sections 22-2-1, 22-2-2, 22-10A-6, and 22-10A-8 NMSA 1978.
[6.60.3.3 NMAC — Rp, 6.60.3.3 NMAC, 11/27/2018]

6.60.3.4 ——— **DURATION:** Permanent
[6.60.3.4 NMAC — Rp, 6.60.3.4 NMAC, 11/27/2018]

6.60.3.5 ——— **EFFECTIVE DATE:** November 27, 2018 unless a later date is cited in the history note at the end of a section.
[6.60.3.5 NMAC — Rp, 6.60.3.5 NMAC, 11/27/2018]

6.60.3.6 ——— **OBJECTIVE:** To define the requirements for obtaining an alternative teaching license, alternative administrator license, or student success advisor license.
[6.60.3.6 NMAC — Rp, 6.60.3.6 NMAC, 11/27/2018]

6.60.3.7 ——— **DEFINITIONS:**

A. "Alternative license" means:

——— (1) ——— a temporary, two-year teaching license issued by the department to a candidate who does not yet meet the requirements for a level 1 standard license but is participating in an alternative route to licensure as defined in Subsections B and C of 6.60.3.9 NMAC; or

——— (2) ——— a temporary, one-year teaching license issued by the department to a candidate who does not yet meet the requirements for a level 1 standard license but is participating in an alternative route to licensure as defined in Subsection D of 6.60.3.9 NMAC; or

——— (3) ——— a temporary, one-year administrator certificate or license issued by the department to a candidate who does not yet meet the requirements for a level 3B administrator license but is participating in an alternative route to licensure as defined in 6.60.3.11 NMAC; or

——— (4) ——— a temporary, five-year alternative student success advisor license issued by the department to a candidate who does not yet meet the requirements for school counselor licensure but is working toward meeting the requirements established in 6.63.6 NMAC.

B. "Competencies for licensure" means the content knowledge and skills a teacher shall know and apply in order to demonstrate competency in a particular content area as defined in Title 6, Chapter 64, Competencies for Licensure, Parts 2 through 18 NMAC.

C. "Department approved educator preparation program" or "department approved EPP" means an educational program approved by the department pursuant to 6.65.3 NMAC that offers coursework intended to lead to teacher licensure upon a candidate's successful completion of program requirements.

D. "Full school year" means a minimum of 160 instructional days or equivalent number of days in schools or local education agencies on alternative schedules over multiple school years of full-time or part-time teaching during which the teacher is the teacher of record or serves as an instructional coach or resource teacher in at least one class each school year while holding a standard teaching license. An equivalent number of instructional hours may be accepted for those teachers who do not teach every day. Instructional days may include teaching in summer school or similar educational setting.

E. "Internship" means an official program with practical experience in which candidates for administrative licensure assume all responsibilities of a school administrator under the guidance of a mentor for a minimum of 180 clock hours throughout one full school year, including those responsibilities that are unique to the beginning and end of the school year. Internships shall be served at a public school, private school, or state educational institution.

~~F. “Local education agency” or “LEA” means a school district or a state-chartered charter school.~~

~~G. “Mental health services” means the responsibilities of a school counselor as outlined in Subsection D and E of 6.63.6.9 NMAC.~~

~~H. “New Mexico teacher assessments” or “NMTA” means the tests required for individuals seeking initial New Mexico licensure.~~

~~I. “NMTEACH” means the department-approved educator effectiveness evaluation system defined in 6.69.8 NMAC that measures teacher performance using the five components:~~

- ~~(1) improved student achievement;~~
- ~~(2) classroom observation;~~
- ~~(3) planning, preparation, and professionalism;~~
- ~~(4) student or parent surveys; and~~
- ~~(5) teacher attendance.~~

~~J. “Standard teaching license” means a certificate or license issued by the department at five and nine year intervals authorizing a person to teach, supervise an instructional program, counsel, provide special instructional services, or serve as an administrator in a New Mexico public school.~~

~~K. “Teacher of record” means the recipient of an alternative teaching license named in an employment contract with an LEA responsible for teaching students and managing a classroom the majority of the time. The teacher of record is responsible for lesson planning, assigning grades, meeting with parents, and completing all duties of a classroom teacher with a standard teaching license. [6.60.3.7 NMAC – Rp, 6.60.3.7 NMAC, 11/27/2018]~~

~~6.60.3.8 PATHWAYS FOR ALTERNATIVE TEACHING LICENSURE: Three pathways shall be available for candidates seeking to obtain an alternative teaching license in New Mexico.~~

~~A. Alternative EPP pathway. A two-year alternative teaching license may be granted to candidates who simultaneously complete face-to-face or online courses through a department-approved EPP while serving as a teacher of record for two years. Candidates who complete the EPP and meet coursework and testing requirements at the conclusion of the two-year alternative license period shall be eligible to transfer to a level 1 standard teaching license.~~

~~B. Alternative NMTEACH pathway. A two-year alternative teaching license may be granted to candidates who simultaneously complete required teaching of reading coursework and testing requirements while serving as a teacher of record. Candidates who complete coursework and testing requirements and who earn two consecutive ratings of effective or higher on NMTEACH at the completion of the two-year alternative license period shall be eligible to transfer to a level 1 standard teaching license.~~

~~C. Alternative post-secondary experience pathway. A one-year alternative license may be granted to candidates who have obtained a bachelor’s and master’s degree in a field outside education and who have taught at an accredited college or university for a minimum of five years. Candidates who serve as the teacher of record for one full school year who earn an effective or higher rating on NMTEACH and who satisfactorily demonstrate teaching competencies for the type and level of licensure being sought, as determined by the LEA, shall be eligible to transfer to a level 2 or level 3A standard teaching license. Candidates following the alternative post-secondary experience pathway shall not be required to complete testing requirements. [6.60.3.8 NMAC – Rp, 6.60.3.8 NMAC, 11/27/2018]~~

~~6.60.3.9 REQUIREMENTS FOR ALTERNATIVE TEACHING LICENSURE:~~

~~A. General requirements. All applicants for alternative teaching licensure shall:~~

- ~~(1) be at least 18 years of age;~~
- ~~(2) hold either a bachelor of arts or science degree, master of arts or science degree, or doctorate degree from a regionally accredited college or university with a minimum grade point average of 2.75;~~
- ~~(3) complete a background check in accordance with 6.60.8 NMAC; and~~
- ~~(4) have no licensure requirements waived on an emergency or temporary basis, or for any other reason; and~~
- ~~(5) meet the application requirements for the license being sought.~~

~~B. Alternative EPP pathway. Applicants following the alternative EPP pathway shall:~~

- ~~(1) pass the required NMTA essential academic skills tests defined in 6.60.5 NMAC prior to receiving alternative licensure at any level;~~
- ~~(2) participate in a department-approved EPP with an alternative licensure program;~~
- ~~(3) serve as a teacher of record for two full school years; and~~

(4) complete no fewer than six semester hours including required hours of coursework in the teaching of reading aligned with the competencies for licensure for entry-level teachers for the type of license being sought.

C. Alternative NMTEACH pathway. Applicants following the alternative NMTEACH pathway shall:

(1) pass the required NMTA essential academic skills tests defined in 6.60.5 NMAC prior to receiving alternative licensure at any level;

(2) serve as a teacher of record for two full school years;

(3) receive two consecutive ratings of effective or higher on the NMTEACH summative evaluation; and

(4) complete required coursework in the teaching of reading.

(a) Applicants seeking early childhood birth to pre-K, early childhood age three to age eight, elementary K-8, or special education pre-K-12 licensure, shall complete six semester hours of coursework in the teaching of reading.

(b) Applicants seeking middle level 5-9, secondary 7-12, or specialty area pre-K-12 licensure, shall complete three semester hours of coursework in the teaching of reading.

D. Alternative post-secondary experience pathway. Applicants following the post-secondary experience pathway shall:

(1) provide documentation of at least five full school years' experience teaching at an accredited college or university;

(2) complete at least one full school year as a teacher of record while holding an alternative license; and

(3) complete required coursework in the teaching of reading.

(a) Applicants seeking early childhood birth to pre-K, early childhood age three to age eight, elementary K-8, or special education pre-K-12 licensure, shall complete six semester hours of coursework in the teaching of reading.

(b) Applicants seeking middle level 5-9, secondary 7-12, or specialty area pre-K-12 licensure, shall complete three semester hours of coursework in the teaching of reading.

[6.60.3.9 NMAC - Rp, 6.60.3.9 NMAC, 11/27/2018]

6.60.3.10 APPLICATION FOR ALTERNATIVE TEACHING LICENSURE:

A. Alternative EPP pathway. Applicants following the alternative EPP pathway who meet the criteria for alternative licensure as defined in 6.60.3 NMAC shall be issued a two-year alternative license and shall be permitted to serve as a teacher of record prior to completion of licensure requirements. The licensee shall complete coursework requirements within the two-year period and shall provide the department with documentation of coursework completion. Candidates with alternative licensure may be issued a one-year extension to allow additional time for completing coursework and testing requirements if they can demonstrate good standing with the LEA or EPP. Applicants for alternative licensure via the alternative EPP pathway shall provide:

(1) official sealed bachelor's degree transcript with at least 30 semester hours in the license subject area, a master's degree transcript with at least 12 graduate hours in the license subject area, or a doctoral degree in the license subject area;

(2) a letter of acceptance into a department-approved EPP; and

(3) proof of passage of required NMTA essential academic skills tests.

B. Alternative NMTEACH pathway. Applicants following the alternative NMTEACH pathway who meet the criteria for alternative licensure as defined in 6.60.3 NMAC shall be issued a two-year alternative license and shall be permitted to serve as a teacher of record prior to completion of licensure requirements. The licensee shall complete coursework requirements within the two-year period and shall provide the department with documentation of coursework completion. Candidates with alternative licensure following the NMTEACH pathway who are not successful in demonstrating competency by way of NMTEACH summative evaluations shall not have their alternative license extended or renewed. Applicants for alternative licensure via the alternative NMTEACH pathway shall provide:

(1) official sealed transcript for a bachelor's degree transcript with at least 30 semester hours in the license subject area, a master's degree transcript with at least 12 graduate hours in the license subject area, or a doctoral degree in the license subject area;

(2) proof of registration to complete required coursework in the teaching of reading;

(3) proof of passage of required NMTA essential academic skills tests;

(4) a letter of support from the LEA requesting that the applicant follow the alternative NMTEACH pathway; and

(5) a letter of interest from the applicant requesting to follow the alternative NMTEACH pathway.

C. Alternative post-secondary experience pathway. Applicants following the alternative post-secondary experience pathway who meet the criteria for alternative licensure as defined in 6.60.3 NMAC shall be issued a one-year alternative license and shall be permitted to serve as a teacher of record prior to completion of licensure requirements. Applicants shall provide:

(1) proof of registration to complete required coursework in the teaching of reading; and

(2) verification of five-years' teaching experience at an accredited college or university. [6.60.3.10 NMAC - Rp, 6.60.3.11 NMAC, 11/27/2018]

6.60.3.11 REQUIREMENTS FOR ALTERNATIVE ADMINISTRATOR LICENSURE:

A. A one-year alternative license in educational administration may be issued to any candidate who:

(1) holds a level 2 or level 3 teaching license; and

(2) has at least six full school years of experience in administration at an accredited college or university. Administrators shall be in a position of supervision which shall include:

(a) dean;

(b) president; and

(c) vice president.

B. Alternatively licensed educational administrators shall complete an internship of at least 180 hours. Upon completion of the internship, the candidate shall be issued a level 3B administrator license so long as they have met the administrator licensure competencies and indicators outlined in 6.62.2.10 NMAC, as verified to the department by the candidate's employer. [6.60.3.11 NMAC - Rp, 6.60.3.11 NMAC, 11/27/2018]

6.60.3.12 REQUIREMENTS FOR ALTERNATIVE STUDENT SUCCESS ADVISOR LICENSURE:

A. Applicants for an alternative student success advisor license shall:

(1) be at least 18 years of age;

(2) hold either a bachelor of arts or science degree from a regionally accredited college or university; and

(3) complete a background check in accordance with 6.60.8 NMAC.

B. Applicants who meet the criteria established in Subsection A of 6.60.3.13 NMAC shall be issued a five-year alternative license to serve as a student success advisor. Student success advisors shall:

(1) work with students in grades seven through 12; and

(2) sign an ethical statement, prescribed by the department, stating that the licensee shall not provide mental health services while employed as a student success advisor.

C. Alternative student success advisor licenses shall be non-renewable. Student success advisors shall complete the requirements to earn a school counselor license defined in 6.63.6 NMAC within the five-year term of their alternative license to maintain employment in the role of a student advisor or to transition into the role of school counselor.

D. Responsibilities of the student success advisor may include any of the following:

(1) maintaining accurate and complete records and reports as required by federal and state law and regulation, department guidance, and district and charter school policies;

(2) analyzing transcripts;

(3) guiding student and parent decision making regarding courses and graduation pathways;

(4) supporting students with the college application and admission process, including preparation for college admissions tests;

(5) developing master schedules;

(6) arranging for dual or concurrent enrollment, career technical education, and advanced placement course offerings;

(7) informing students about postsecondary financing options such as the free application for federal student aid that can be used to support advanced education and training;

(8) supporting student documentation of career preparedness, including industry recognized credentials or certificates, test results, grades, samples of student work, resumes, and cover letters to prospective employers;

- _____ (9) _____ planning and conducting activities focused on increasing career awareness;
 - _____ (10) _____ conducting orientation and training programs for students, parents, and staff;
 - _____ (11) _____ serving as a district or school test coordinator or administrator as defined in 6.10.7 NMAC; and
 - _____ (12) _____ supporting students in meeting the requirements for a New Mexico diploma of excellence by providing guidance on coursework and demonstration of competency requirements.
- E. _____ Responsibilities of the student success advisor shall not include providing mental health services. [6.60.3.12 NMAC - Rp, 6.60.3.12 NMAC, 11/27/2018]

HISTORY OF 6.60.3 NMAC:

PRE-NMAC HISTORY: The material in this part was derived from that previously filed with State Records Center and Archives under: SBE Regulation No. 86-6, Alternative Licensure, filed July 14, 1986; and SBE Regulation No. 86-6, Amendment No. 1, Alternative Licensure filed December 4, 1990.

HISTORY OF REPEALED MATERIAL:

6 NMAC 4.2.2.1, Alternative Licensure, was repealed by the State Board of Education effective July 1, 2000 and repromulgated effective July 1, 2000.
 6.60.3 NMAC, Alternative Licensure, filed June 1, 2001 – was repealed and replaced by 6.60.3 NMAC, Alternative Licensure, effective 10/31/2007.
 6.60.3 NMAC, Alternative Licensure, filed 10/31/2007 – was repealed and replaced by 6.60.3 NMAC, Alternative Licensure, effective 11/27/2018.

- 6.60.3.1 ISSUING AGENCY:** Public Education Department, herein after the department.
 [6.60.3.1 NMAC - Rp, 6.60.3.1 NMAC, 8/13/2019]
- 6.60.3.2 SCOPE:** Applicants for alternative teaching licensure, alternative administrative licensure, or student success advisor licensure.
 [6.60.3.2 NMAC - Rp, 6.60.3.2 NMAC, 8/13/2019]
- 6.60.3.3 STATUTORY AUTHORITY:** Sections 22-2-1, 22-2-2, 22-10A-6, and 22-10A-8 NMSA 1978.
 [6.60.3.3 NMAC - Rp, 6.60.3.3 NMAC, 8/13/2019]
- 6.60.3.4 DURATION:** Permanent
 [6.60.3.4 NMAC - Rp, 6.60.3.4 NMAC, 8/13/2019]
- 6.60.3.5 EFFECTIVE DATE:** August 13, 2019 unless a later date is cited in the history note at the end of a section.
 [6.60.3.5 NMAC - Rp, 6.60.3.5 NMAC, 8/13/2019]
- 6.60.3.6 OBJECTIVE:** To define the requirements for obtaining an alternative teaching license, alternative administrator license, or student success advisor license.
 [6.60.3.6 NMAC - Rp, 6.60.3.6 NMAC, 8/13/2019]
- 6.60.3.7 DEFINITIONS:**
- A. **“Alternative license”** means:
- (1) a temporary, two-year teaching license issued by the department to a candidate who does not yet meet the requirements for a level 1 standard license but is participating in an alternative route to licensure;
 - (2) a temporary, one-year teaching license issued by the department to a candidate who does not yet meet the requirements for a level 1 standard license but is participating in an alternative route to;
 - (3) a temporary, one-year administrator certificate or license issued by the department to a candidate who does not yet meet the requirements for a level 3B administrator license but is participating in an alternative route to licensure; or
 - (4) a temporary, five-year alternative student success advisor license issued by the department to a candidate who does not yet meet the requirements for school counselor licensure but is working toward meeting the requirements established in Rule 6.63.6 NMAC.

- B. “Competencies for licensure”** means the content knowledge and skills a teacher shall know and apply in order to demonstrate competency in a particular content area as defined in Rules 6.64.2 through 6.64.18 NMAC.
- C. “EPP”** means an educator preparation program that offers coursework intended to lead to teacher or administration licensure upon a candidate’s successful completion of the program requirements.
- D. “Department-approved EPP”** means an EPP that has been approved by the department pursuant to Rule 6.65.3 NMAC.
- E. “Educator effectiveness system”** means the department-approved educator evaluation system.
- F. “Full school year”** means, for the purposes of this rule and as used herein, for K-12 schools, a minimum of 160 instructional days or, for post-secondary institutions, two consecutive semesters commencing in the fall. An equivalent number of instructional hours may be accepted for those teachers who do not teach every day. Instructional days may include teaching in summer school or similar educational setting.
- G. “Internship”** means an official program with practical experience in which candidates for administrative licensure assume all responsibilities of a school administrator under the guidance of a mentor for a minimum of 180 clock hours throughout one full school year, including those responsibilities that are unique to the beginning and end of the school year. A candidate’s internship must be served at a public school, private school, or state educational institution.
- H. “LEA”** means a local educational agency as defined in 34 CFR Sec. 300.28.
- I. “Mental health services”** means the responsibilities of a school counselor as outlines in Subsection D and E of 6.63.6.9 NMAC.
- J. “New Mexico teacher assessments”** means the department-approved tests required for individuals seeking initial New Mexico licensure.
- K. “Regionally accredited college or university”** means a higher education institution accredited by one of several regional organizations recognized by the United States department of education.
- L. “Standard teaching license”** means a certificate or license issued by the department at five-year and nine-year intervals authorizing a person to teach, supervise an instructional program, counsel, provide special instructional services, or serve as an administrator in a New Mexico public school.
- M. “Teacher of record”** means the recipient of an alternative teaching license named in an employment contract with an LEA responsible for teaching students and managing a classroom the majority of the time. The teacher of record is responsible for lesson planning, assigning grades, meeting with parents, and completing all duties of a classroom teacher with a standard teaching license.
[6.60.3.7 NMAC - Rp, 6.60.3.7 NMAC, 8/13/2019]

6.60.3.8 ALTERNATIVE PATHWAYS FOR TEACHING LICENSURE: Three alternative pathways shall be available for candidates seeking to obtain a teaching license in New Mexico.

- A. Alternative EPP pathway.** A two-year alternative teaching license may be granted to candidates who simultaneously complete face-to-face or online courses through a department-approved EPP while serving as a teacher of record for two years. Candidates who complete the EPP and meet coursework and testing requirements at the conclusion of the two-year alternative license period shall be eligible to apply for a level 1 standard teaching license.
- B. Alternative educator effectiveness pathway.** A two-year alternative teaching license may be granted to candidates who simultaneously complete required teaching of reading coursework and testing requirements while serving as a teacher of record. Candidates who complete coursework and testing requirements and who earn two consecutive ratings of effective or higher on the summative report at the completion of the two-year alternative license period shall be eligible to apply for a level 1 standard teaching license.
- C. Alternative post-secondary experience pathway.** A one-year alternative teaching license may be granted to candidates who have obtained a bachelor’s and master’s degree in a field outside education and who have taught at a regionally accredited college or university for at least five full school years. Candidates who serve as the teacher of record for one full school year and who satisfactorily demonstrate teaching competencies for the type and level of licensure being sought, as determined by the LEA, shall be eligible to apply for a level 2 or level 3A standard teaching license. Candidates following the alternative post-secondary experience pathway shall not be required to complete testing requirements.
[6.60.3.8 NMAC - Rp, 6.60.3.8 NMAC, 8/13/2019]

6.60.3.9 REQUIREMENTS FOR ALTERNATIVE TEACHING LICENSURE:

- A. General requirements.** All applicants for alternative teaching licensure shall:

Commented [TS1]: What if they are not teaching while doing the EPP route? This implies that an Alternative Licensure candidate **must** teach for 2 years while in the EPP program. Candidates may teach for **any amount of time** during a program on an Alternative Level 1 license.

Commented [TS2]: The previous rule indicated they would “transfer” to a level 1 license, this language indicates they have to apply for a license. Wouldn’t this be redundant since they already hold a license? This needs to be corrected to say “transfer”

- (1) be at least 18 years of age;
- (2) hold either a bachelor of arts or science degree, master of arts or science degree, or doctorate degree from a regionally accredited college or university;
- (3) complete a background check in accordance with 6.60.8 NMAC;
- (4) have no licensure requirements waived on an emergency or temporary basis, or for any other reason; and

Commented [TS3]: The NMPED will need to determine if clear or not, this is not something that EPPs can determine.

B. Alternative EPP pathway. Applicants following the alternative EPP pathway shall:

- (1) participate in a department-approved EPP with an alternative licensure program;
- (2) serve as a teacher of record for two full school years;
- (3) complete no fewer than six semester hours including required hours of coursework in the teaching of reading aligned with the competencies for licensure for entry-level teachers for the type of license being sought;

Commented [TS4]: This is not true. Candidates DO NOT have to teach while in an alternative program for a set amount of time.

- (4) complete a student-teaching or field-based component course as provided by the program; and

C. Alternative educator effectiveness pathway. Applicants following the alternative educator effectiveness pathway shall:

- (1) serve as a teacher of record for two full school years;
- (2) receive two consecutive ratings of effective or higher on the summative report; and
- (3) complete required coursework in the teaching of reading.
 - (a) Applicants seeking early childhood birth to pre-K, early childhood age three to age eight, elementary K-8, or special education pre K-12 licensure, shall complete six semester hours of coursework in the teaching of reading.

- (b) Applicants seeking middle level 5-9, secondary 7-12, or specialty area pre K-12 licensure, shall complete three semester hours of coursework in the teaching of reading.

Commented [TS5]: Are tests not required for this pathway, they are not listed in this section.

D. Alternative post-secondary experience pathway. Applicants following the post-secondary experience pathway shall:

- (1) provide documentation of at least five full school years' experience teaching at a regionally accredited college or university;
 - (a) Applicants with at least five full school years' experience shall be issued a level 2 license upon completion of the alternative post-secondary experience pathway.

Is a bachelor's required?

What are transcript analysis requirements?

No "Application" section for this pathway below in 6.60.3.10

The requirements for the alternative educator effectiveness pathway should be the same as the EPP pathway.

- (b) Applicants with six or more years shall be issued a level 3A license upon completion of the alternative post-secondary experience pathway.

- (2) complete at least one full school year as a teacher of record while holding an alternative license; and

- (3) complete required coursework in the teaching of reading.
 - (a) Applicants seeking early childhood birth to pre-K, early childhood age three to age eight, elementary K-8, or special education pre K-12 licensure, shall complete six semester hours of coursework in the teaching of reading.

- (b) Applicants seeking middle level 5-9, secondary 7-12, or specialty area pre K-12 licensure, shall complete three semester hours of coursework in the teaching of reading.

[6.60.3.9 NMAC - Rp, 6.60.3.9 NMAC, 8/13/2019]

6.60.3.10 APPLICATION FOR ALTERNATIVE TEACHING LICENSURE:

- A. Alternative EPP pathway.** Applicants following the alternative EPP pathway who meet the criteria for alternative licensure as defined in 6.60.3 NMAC shall be issued a two-year alternative license and shall be permitted to serve as a teacher of record prior to completion of licensure requirements. The licensee shall complete coursework requirements within the two-year period and shall provide the department with documentation of coursework completion. All years completed on an alternative license shall count toward advancement to a level 2 license. Candidates with alternative licensure may be issued a one-year extension to allow additional time for completing coursework and testing requirements if they can demonstrate good standing with the LEA or EPP. Applicants for alternative licensure via the alternative EPP pathway shall provide:

Commented [TS6]: There is no application for the educator effectiveness pathway. Is that section missing? What do they need to do to be issued an alternative license?

- (1) official sealed bachelor's degree transcript with at least 30 semester hours in the license subject area of instruction to include language arts, mathematics, science, social studies, fine or performing arts, foreign language or humanities;

Commented [TS7]: We hope that the 30 hours of content rule will remain, without including 12 credits of upper division.

If it is added, it will eliminate most alternative applicants to STEM fields as alternative licensure individuals can't go back to obtain additional credits in upper division courses.

(2) master's degree transcript with at least 12 graduate hours in the license subject area of instruction to include language arts, mathematics, science, social studies, fine or performing arts, foreign language or humanities;

(3) doctoral degree in the license subject area of instruction to include language arts, mathematics, science, social studies, fine or performing arts, foreign language or humanities; and

(4) a letter of acceptance into a department-approved EPP.

B. Alternative post-secondary experience pathway. Applicants following the alternative post-secondary experience pathway who meet the criteria for alternative licensure as defined in 6.60.3 NMAC shall be issued a one-year alternative license and shall be permitted to serve as a teacher of record prior to completion of licensure requirements. Applicants shall provide verification of at least five-years' teaching experience at a regionally accredited college or university.

[6.60.3.10 NMAC - Rp, 6.60.3.11 NMAC, 8/13/2019]

6.60.3.11 REQUIREMENTS FOR ALTERNATIVE ADMINISTRATOR LICENSURE:

A. A one-year alternative license in educational administration may be issued to any candidate who:

(1) holds a level 2 or level 3 teaching license; and

(2) has at least six full school years of experience in administration at a regionally accredited college or university. Administrators shall be in a position of supervision which shall include but are not limited to:

(a) dean;

(b) president; or

(c) vice president.

B. Alternatively licensed educational administrators shall complete an internship of at least 180 hours. Upon completion of the internship, the candidate shall be issued a level 3B administrator license so long as they have met the administrator licensure competencies and indicators outlined in 6.62.2.10 NMAC, as verified to the department by the candidate's employer.

[6.60.3.11 NMAC - Rp, 6.60.3.11 NMAC, 8/13/2019]

6.60.3.12 REQUIREMENTS FOR ALTERNATIVE STUDENT SUCCESS ADVISOR LICENSURE:

A. Applicants for an alternative student success advisor license shall:

(1) be at least 18 years of age;

(2) hold either a bachelor of arts or science degree from a regionally accredited college or university; and

(3) complete a background check in accordance with 6.60.8 NMAC.

B. Applicants who meet the criteria established in Subsection A of 6.60.3.13 NMAC shall be issued a five-year alternative license to serve as a student success advisor. Student success advisors shall:

(1) work with students in grades seven through 12; and

(2) sign an ethical statement, prescribed by the department, stating that the licensee shall not provide mental health services while employed as a student success advisor.

C. Alternative student success advisor licenses shall be non-renewable. Student success advisors shall complete the requirements to earn a school counselor license defined in 6.63.6 NMAC within the five-year term of their alternative license to maintain employment in the role of a student advisor or to transition into the role of school counselor.

D. Responsibilities of the student success advisor may include any of the following:

(1) maintaining accurate and complete records and reports as required by federal and state law and regulation, department guidance, and district and charter school policies;

(2) analyzing transcripts;

(3) guiding student and parent decision making regarding courses and graduation pathways;

(4) supporting students with the college application and admission process, including preparation for college admissions tests;

(5) developing master schedules;

(6) arranging for dual or concurrent enrollment, career technical education, and advanced placement course offerings;

(7) informing students about postsecondary financing options such as the free application for federal student aid that can be used to support advanced education and training;

Commented [SO8]: This doesn't align with the current statutes. Shouldn't this not be required?

Commented [AC9]: I would add Director, or supervisory administrator to this list.

(8) supporting student documentation of career preparedness, including industry-recognized credentials or certificates, test results, grades, samples of student work, resumes, and cover letters to prospective employers;

(9) planning and conducting activities focused on increasing career awareness;

(10) conducting orientation and training programs for students, parents, and staff;

(11) serving as a district or school test coordinator or administrator as defined in 6.10.7

NMAC; and

(12) supporting students in meeting the requirements for a New Mexico diploma of excellence by providing guidance on coursework and demonstration of competency requirements.

E. Responsibilities of the student success advisor shall not include providing mental health services. [6.60.3.12 NMAC - Rp, 6.60.3.12 NMAC, 8/13/2019]

HISTORY OF 6.60.3 NMAC:

PRE-NMAC HISTORY: The material in this part was derived from that previously filed with State Records Center and Archives under:

SBE Regulation No. 86-6, Alternative Licensure, filed July 14, 1986; and

SBE Regulation No. 86-6, Amendment No. 1, Alternative Licensure filed December 4, 1990.

HISTORY OF REPEALED MATERIAL:

6 NMAC 4.2.2.1, Alternative Licensure, was repealed by the State Board of Education effective July 1, 2000 and repromulgated effective July 1, 2000.

6.60.3 NMAC, Alternative Licensure, filed June 1, 2001 - was repealed and replaced by 6.60.3 NMAC, Alternative Licensure, effective 10/31/2007.

6.60.3 NMAC, Alternative Licensure, filed 10/31/2007 - was repealed and replaced by 6.60.3 NMAC, Alternative Licensure, effective 11/27/2018.

6.60.3 NMAC, Alternative Licensure, filed 11/27/2018 - was repealed and replaced by 6.60.3 NMAC, Alternative Licensure, effective 8/13/2019.

[EXT] Public Comment NMAC 6.60.3

Cecilia Hernandez <cecimh@nmsu.edu>

Thu 7/25/2019 6:06 PM

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

Cc:Gwendolyn Perea Perea Warniment <gpw@nmsu.edu>;

 1 attachment

6.60.3_Alt-Licensure-Integrated_web written suggestions.docx;

Attached please find my comments to the proposed rule change of NMAC 6.60.3

Thank you,

Dr. Hernandez

+++++

Dr. Cecilia Hernandez

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TITLE 6 PRIMARY AND SECONDARY EDUCATION
CHAPTER 60 SCHOOL PERSONNEL - GENERAL PROVISIONS
PART 3 ALTERNATIVE LICENSURE

6.60.3.1 ISSUING AGENCY: Public Education Department, herein after the department.
[6.60.3.1 NMAC - Rp, 6.60.3.1 NMAC, 8/13/2019]

6.60.3.2 SCOPE: Applicants for alternative teaching licensure, alternative administrative licensure, or student success advisor licensure. **The original rule passed and published, 10-31-07, had a much more robust definition and explanation of the scope of the rule that is not in this current iteration, nor in the one passed and published in July 2018. In my opinion, by removing the description below, the proposed rule is limited and leaves it open to a variety of interpretations.**

6.60.3.2 SCOPE: *This rule establishes alternative pathways to teacher licensure in early childhood education, elementary education, middle level education, pre K-12 specialty area education, secondary education, or special education for persons who have earned at least a baccalaureate degree from a regionally accredited college or university but have never completed an educator preparation program and for persons who hold a post-baccalaureate degree and have teaching experience at the post-secondary level. This rule also establishes an alternative licensure pathway in administration for persons who hold a post-baccalaureate degree and have administration experience at the post-secondary level. The alternative pathways to teaching licensure in this rule may also be used by teachers employed in New Mexico public schools, charter schools, accredited or private schools who hold standard teaching licensure, to obtain additional licensure at the same level as their existing license or licenses.*
[6.60.3.2 NMAC - Rp, 6.60.3.2 NMAC, 10-31-07; A, 06-15-09]

[6.60.3.2 NMAC - Rp, 6.60.3.2 NMAC, 8/13/2019]

6.60.3.3 STATUTORY AUTHORITY: Sections 22-2-1, 22-2-2, 22-10A-6, and 22-10A-8 NMSA 1978.
[6.60.3.3 NMAC - Rp, 6.60.3.3 NMAC, 8/13/2019]

6.60.3.4 DURATION: Permanent
[6.60.3.4 NMAC - Rp, 6.60.3.4 NMAC, 8/13/2019]

6.60.3.5 EFFECTIVE DATE: August 13, 2019 unless a later date is cited in the history note at the end of a section.
[6.60.3.5 NMAC - Rp, 6.60.3.5 NMAC, 8/13/2019]

6.60.3.6 OBJECTIVE: To define the requirements for obtaining an alternative teaching license, alternative administrator license, or student success advisor license.
[6.60.3.6 NMAC - Rp, 6.60.3.6 NMAC, 8/13/2019]

6.60.3.7 DEFINITIONS:

A. “Alternative license” means:

- not yet meet the requirements for a level 1 standard license but is participating in an alternative route to licensure;
- (1) a temporary, two-year teaching license issued by the department to a candidate who does not yet meet the requirements for a level 1 standard license but is participating in an alternative route to licensure;
 - (2) a temporary, one-year teaching license issued by the department to a candidate who does not yet meet the requirements for a level 1 standard license but is participating in an alternative route to **licensure**;
 - (3) a temporary, one-year administrator certificate or license issued by the department to a candidate who does not yet meet the requirements for a level 3B administrator license but is participating in an alternative route to licensure; or
 - (4) a temporary, five-year alternative student success advisor license issued by the department to a candidate who does not yet meet the requirements for school counselor licensure but is working toward meeting the requirements established in Rule 6.63.6 NMAC.

B. “Competencies for licensure” means the content knowledge and skills a teacher shall know and apply in order to demonstrate competency in a particular content area as defined in Rules 6.64.2 through 6.64.18 NMAC. **The Definitions provided in the 2007 rule have a more detailed and defined outline of requirements that provides information without having to navigate to another rules page. It also provides those of us who**

direct EPP programs a more direct link to each level of instruction especially when determining eligibility for elementary and secondary candidates.

B. “Appertains and corresponds to the subject area of instruction and level of instruction” means:

(1) that for early childhood licensure, the degree, including the credit hours, shall be related to early childhood education, birth through grade 3;

(2) that for elementary licensure, the degree, including the credit hours, shall include completed course work in any combination of the subject areas of language arts, mathematics, science, social studies, history, fine or performing arts and foreign language;

(3) that for middle level, secondary, and pre K-12 specialty area licensure the degree, including the credit hours, shall be in the license or endorsement area being sought; and,

(4) that for special education licensure, the degree, including the credit hours, shall include completed course work in any combination of the subject areas of language arts, mathematics, science, social studies, history, fine or performing arts and foreign language, or shall be related to special education (such as general elementary or secondary education, special education, psychology, child development, reading education).

C. “EPP” means an educator preparation program that offers coursework intended to lead to teacher or administration licensure upon a candidate’s successful completion of the program requirements.

D. “Department-approved EPP” means an EPP that has been approved by the department pursuant to Rule 6.65.3 NMAC.

E. “Educator effectiveness system” means the department-approved educator evaluation system.

F. “Full school year” means, for the purposes of this rule and as used herein, for K-12 schools, a minimum of 160 instructional days or, for post-secondary institutions, two consecutive semesters commencing in the fall. An equivalent number of instructional hours may be accepted for those teachers who do not teach every day. Instructional days may include teaching in summer school or similar educational setting.

G. “Internship” means an official program with practical experience in which candidates for administrative licensure assume all responsibilities of a school administrator under the guidance of a mentor for a **minimum of 180 clock hours throughout one full school year**, including those responsibilities that are unique to the beginning and end of the school year. A candidate’s internship must be served at a public school, private school, or state educational institution. **So, does this apply only to the administrator alternative pathway?**

H. “LEA” means a local educational agency as defined in 34 CFR Sec. 300.28.

I. “Mental health services” means the responsibilities of a school counselor as outlines in Subsection D and E of 6.63.6.9 NMAC.

J. “New Mexico teacher assessments” means the department-approved tests required for individuals seeking initial New Mexico licensure.

K. “Regionally accredited college or university” means a higher education institution accredited by one of several regional organizations recognized by the United States department of education.

L. “Standard teaching license” means a certificate or license issued by the department at five-year and nine-year intervals authorizing a person to teach, supervise an instructional program, counsel, provide special instructional services, or serve as an administrator in a New Mexico public school.

M. “Teacher of record” means the recipient of an alternative teaching license named in an employment contract with an LEA responsible for teaching students and managing a classroom the majority (**What is the “majority of the time”? Part or all of the school day? Does this have to be content specific or could the candidate serve as an educational assistant (e.g. Academic Educational Specialist?)**) of the time. The teacher of record is responsible for lesson planning, assigning grades, meeting with parents, and completing all duties of a classroom teacher with a standard teaching license.

[6.60.3.7 NMAC - Rp, 6.60.3.7 NMAC, 8/13/2019]

6.60.3.8 ALTERNATIVE PATHWAYS FOR TEACHING LICENSURE: Three alternative pathways shall be available for candidates seeking to obtain a teaching license in New Mexico.

A. **Alternative EPP pathway.** A two-year alternative teaching license may be granted to candidates who simultaneously complete face-to-face or online courses through a department-approved EPP while serving as a teacher of record for two years. Candidates who complete the EPP and meet coursework and testing

requirements at the conclusion of the two-year alternative license period shall be eligible to apply for a level 1 standard teaching license.

B. Alternative educator effectiveness pathway. A two-year alternative teaching license may be granted to candidates who simultaneously complete required teaching of reading coursework and testing requirements while serving as a teacher of record. Candidates who complete coursework and testing requirements and who earn two consecutive ratings of effective or higher on the summative report at the completion of the two-year alternative license period shall be eligible to apply for a level 1 standard teaching license.

C. Alternative post-secondary experience pathway. A one-year alternative teaching license may be granted to candidates who have obtained a bachelor's and master's degree in a field outside education and who have taught at a regionally accredited college or university for at least five full school years. Candidates who serve as the teacher of record for one full school year and who satisfactorily demonstrate teaching competencies for the type and level of licensure being sought, as determined by the LEA, shall be eligible to apply for a level 2 or level 3A standard teaching license. Candidates following the alternative post-secondary experience pathway shall not be required to complete testing requirements.

[6.60.3.8 NMAC - Rp, 6.60.3.8 NMAC, 8/13/2019]

6.60.3.9 REQUIREMENTS FOR ALTERNATIVE TEACHING LICENSURE:

A. General requirements. All applicants for alternative teaching licensure shall:

- (1) be at least 18 years of age;
- (2) hold either a bachelor of arts or science degree, master of arts or science degree, or doctorate degree from a regionally accredited college or university;
- (3) complete a background check in accordance with 6.60.8 NMAC;
- (4) have no licensure requirements waived on an emergency or temporary basis, or for any other reason; and
- (5) meet the application requirements for the license being sought.

B. Alternative EPP pathway. Applicants following the alternative EPP pathway shall:

- (1) participate in a department-approved EPP with an alternative licensure program;
- (2) serve as a teacher of record for two full school years;
- (3) complete no fewer than six semester hours including required hours of coursework in the teaching of reading aligned with the competencies for licensure for entry-level teachers for the type of license being sought;
- (4) complete a student-teaching or **field-based component course** as provided by the program; and **How is "field-based component course" defined? Above in section B, it states that the ALC is the teacher of record, what form of "student teaching" or "field-based course" would be acceptable?**
- (5) pass all department-approved New Mexico teacher assessments within two years. **Should a person with an undergraduate degree be required to complete the essential academic skills exams if they were able to earn a degree from an accredited institution? What about a master's or doctoral degree in the field? Since it is likely that many Ph.D. candidates have taught at the post-secondary level and are not required to take the exams, why would a Ph.D. candidate have to take a basic skills exam if they choose the EPP pathway?**

I might be helpful to consider the 2007 version:

6.60.3.8 REQUIREMENTS FOR ALTERNATIVE TEACHING LICENSURE: To receive a level 1, five-year alternative teaching license, an applicant must meet the following requirements:

A. Degree requirements - An applicant for alternative licensure must meet the provisions of Subsection A, Paragraphs (1), (2) or (3):

(1) must possess a Bachelor of Arts or science degree from a regionally accredited college or university including completion of a minimum of thirty semester hours of graduate or undergraduate credit in a particular field that appertains and corresponds to the subject area of instruction and level of instruction that will enable the applicant to teach in a competent manner as determined by the PED; or

(2) must possess a Master of Arts or science degree from a regionally accredited college or university including completion of a minimum of twelve graduate credit hours in a

particular field that appertains and corresponds to the subject area of instruction and level of instruction that will enable the applicant to teach in a competent manner as determined by the PED; or

(3) must possess a doctor's degree from a regionally accredited college or university; the degree shall correspond to the subject area of instruction and particular grade level that will enable the applicant to teach in a competent manner as determined by the PED.

B. Professional teacher education requirements - An applicant for alternative licensure who has earned at least a baccalaureate degree from a regionally accredited college or university but has never completed an educator preparation program must meet the provisions of Paragraphs (1), (2), or (3) or (4) of this subsection.

(1) Persons seeking either early childhood birth-grade 3, elementary K-8, or special education pre K-12 licensure, must complete various semester hours of credit earned through a regionally accredited college or university that has a PED-approved alternative licensure program containing no less than twelve (12) nor more than twenty-one (21) semester hours of credit and meeting the following criteria:

(a) the credits must include six (6) semester hours of coursework in the teaching of reading; and

(b) the credits must include the PED competencies for entry level teachers that correspond to the license being sought; and

(c) the credits must be in a program approved by the PED; and

(d) the program must include a student teaching or field-based component.

(2) Persons seeking either middle level 5-9, secondary 7-12 or specialty area pre K-12 licensure, must complete various semester hours of credit earned through a regionally accredited college or university that has a PED-approved alternative licensure program containing no less than twelve (12) nor more than eighteen (18) semester hours of credit and meeting the following criteria:

(a) the credits must include three (3) semester hours of coursework in the teaching of reading; and

(b) the credits must include the PED's competencies for entry level teachers that correspond to the license being sought; and

(c) the credits must be in a program approved by the PED; and

(d) the program must include a student teaching or field-based component.

C. **Alternative educator effectiveness pathway.** Applicants following the alternative educator effectiveness pathway shall:

(1) serve as a teacher of record for two full school years;

(2) receive two consecutive ratings of effective or higher on the summative report; and

(3) complete required coursework in the teaching of reading.

(a) Applicants seeking early childhood birth to pre-K, early childhood age three to age eight, elementary K-8, or special education pre K-12 licensure, shall complete six semester hours of coursework in the teaching of reading.

(b) Applicants seeking middle level 5-9, secondary 7-12, or specialty area pre K-12 licensure, shall complete three semester hours of coursework in the teaching of reading. **It would be helpful to include this level of detail above in the EPP pathway as well.**

D. **Alternative post-secondary experience pathway.** Applicants following the post-secondary experience pathway shall:

(1) provide documentation of at least five full school years' experience teaching at a regionally accredited college or university; **A full school year meaning two 16 week semesters that the candidates is the teacher of record in a college or university? Does this apply to Ph.D. candidates who teach post-secondary courses while in their program of study?**

(a) Applicants with at least five full school years' experience shall be issued a level 2 license upon completion of the alternative post-secondary experience pathway.

(b) Applicants with six or more years shall be issued a level 3A license upon completion of the alternative post-secondary experience pathway.

(2) complete at least one full school year as a teacher of record while holding an alternative license; and

(3) complete required coursework in the teaching of reading.

(a) Applicants seeking early childhood birth to pre-K, early childhood age three to age eight, elementary K-8, or special education pre K-12 licensure, shall complete six semester hours of coursework in the teaching of reading.

(b) Applicants seeking middle level 5-9, secondary 7-12, or specialty area pre K-12 licensure, shall complete three semester hours of coursework in the teaching of reading.

[6.60.3.9 NMAC - Rp, 6.60.3.9 NMAC, 8/13/2019]

6.60.3.10 APPLICATION FOR ALTERNATIVE TEACHING LICENSURE:

A. Alternative EPP pathway. Applicants following the alternative EPP pathway who meet the criteria for alternative licensure as defined in 6.60.3 NMAC shall be issued a two-year alternative license and shall be permitted to serve as a teacher of record prior to completion of licensure requirements. The licensee shall complete coursework requirements within the two-year period and shall provide the department with documentation of coursework completion. All years completed on an alternative license shall count toward advancement to a level 2 license. Candidates with alternative licensure may be issued a one-year extension to allow additional time for completing coursework and testing requirements if they can demonstrate good standing with the LEA or EPP. Applicants for alternative licensure via the alternative EPP pathway shall provide:

(1) official sealed bachelor's degree transcript with at least 30 semester hours in the license subject area of instruction to include language arts, mathematics, science, social studies, fine or performing arts, foreign language or humanities;

(2) master's degree transcript with at least 12 graduate hours in the license subject area of instruction to include language arts, mathematics, science, social studies, fine or performing arts, foreign language or humanities;

(3) doctoral degree in the license subject area of instruction to include language arts, mathematics, science, social studies, fine or performing arts, foreign language or humanities; and

(4) a letter of acceptance into a department-approved EPP.

B. Alternative post-secondary experience pathway. Applicants following the alternative post-secondary experience pathway who meet the criteria for alternative licensure as defined in 6.60.3 NMAC shall be issued a one-year alternative license and shall be permitted to serve as a teacher of record prior to completion of licensure requirements. Applicants shall provide verification of at least five-years' teaching experience at a regionally accredited college or university.

[6.60.3.10 NMAC - Rp, 6.60.3.11 NMAC, 8/13/2019]

6.60.3.11 REQUIREMENTS FOR ALTERNATIVE ADMINISTRATOR LICENSURE:

A. A one-year alternative license in educational administration may be issued to any candidate who:

(1) holds a level 2 or level 3 teaching license; and

(2) has at least six full school years of experience in administration at a regionally accredited college or university. Administrators shall be in a position of supervision which shall include but are not limited to:

(a) dean;

(b) president; or

(c) vice president.

B. Alternatively licensed educational administrators shall complete an internship of at least 180 hours. Upon completion of the internship, the candidate shall be issued a level 3B administrator license so long as they have met the administrator licensure competencies and indicators outlined in 6.62.2.10 NMAC, as verified to the department by the candidate's employer.

[6.60.3.11 NMAC - Rp, 6.60.3.11 NMAC, 8/13/2019]

6.60.3.12 REQUIREMENTS FOR ALTERNATIVE STUDENT SUCCESS ADVISOR LICENSURE:

A. Applicants for an alternative student success advisor license shall:

(1) be at least 18 years of age;

(2) hold either a bachelor of arts or science degree from a regionally accredited college or university; and

(3) complete a background check in accordance with 6.60.8 NMAC.

B. Applicants who meet the criteria established in Subsection A of 6.60.3.13 NMAC shall be issued a five-year alternative license to serve as a student success advisor. Student success advisors shall:

- (1) work with students in grades seven through 12; and
- (2) sign an ethical statement, prescribed by the department, stating that the licensee shall not provide mental health services while employed as a student success advisor.

C. Alternative student success advisor licenses shall be non-renewable. Student success advisors shall complete the requirements to earn a school counselor license defined in 6.63.6 NMAC within the five-year term of their alternative license to maintain employment in the role of a student advisor or to transition into the role of school counselor.

D. Responsibilities of the student success advisor may include any of the following:

- (1) maintaining accurate and complete records and reports as required by federal and state law and regulation, department guidance, and district and charter school policies;
- (2) analyzing transcripts;
- (3) guiding student and parent decision making regarding courses and graduation pathways;
- (4) supporting students with the college application and admission process, including preparation for college admissions tests;
- (5) developing master schedules;
- (6) arranging for dual or concurrent enrollment, career technical education, and advanced placement course offerings;
- (7) informing students about postsecondary financing options such as the free application for federal student aid that can be used to support advanced education and training;
- (8) supporting student documentation of career preparedness, including industry-recognized credentials or certificates, test results, grades, samples of student work, resumes, and cover letters to prospective employers;
- (9) planning and conducting activities focused on increasing career awareness;
- (10) conducting orientation and training programs for students, parents, and staff;
- (11) serving as a district or school test coordinator or administrator as defined in 6.10.7 NMAC; and
- (12) supporting students in meeting the requirements for a New Mexico diploma of excellence by providing guidance on coursework and demonstration of competency requirements.

E. Responsibilities of the student success advisor shall not include providing mental health services. [6.60.3.12 NMAC - Rp, 6.60.3.12 NMAC, 8/13/2019]

HISTORY OF 6.60.3 NMAC:

PRE-NMAC HISTORY: The material in this part was derived from that previously filed with State Records Center and Archives under:
SBE Regulation No. 86-6, Alternative Licensure, filed July 14, 1986; and
SBE Regulation No. 86-6, Amendment No, 1, Alternative Licensure filed December 4, 1990.

HISTORY OF REPEALED MATERIAL:

6 NMAC 4.2.2.1, Alternative Licensure, was repealed by the State Board of Education effective July 1, 2000 and repromulgated effective July 1, 2000.

6.60.3 NMAC, Alternative Licensure, filed June 1, 2001 - was repealed and replaced by 6.60.3 NMAC, Alternative Licensure, effective 10/31/2007.

6.60.3 NMAC, Alternative Licensure, filed 10/31/2007 - was repealed and replaced by 6.60.3 NMAC, Alternative Licensure, effective 11/27/2018.

6.60.3 NMAC, Alternative Licensure, filed 11/27/2018 - was repealed and replaced by 6.60.3 NMAC, Alternative Licensure, effective 8/13/2019.

[EXT] Comments on 6.60.3 NMAC, Alternative Licensure

Charles Bowyer <cbowyer@neanm.org>

Fri 7/26/2019 3:54 PM

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

 1 attachment

6.60.3 NMAC, Alternative Licensure written comment.pdf;

Sent from [Mail](#) for Windows 10

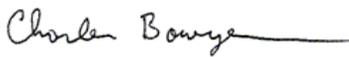
I have attached a NEA Policy on alternative pathways to teacher licensing.

While we support the proposed changes to 6.60.3 NMAC, Alternative Licensure, because we have a real urgency to get licensed teachers into New Mexico classrooms; we certainly support removing references to NMTEACH.

However, we support future changes in the rule that will make all alternative pathways comport with the NEA policy document. Neither the alternative educator effectiveness pathway nor the alternative post-secondary experience pathway contained in the rule meet the standards of the policy brief. Of course, neither did the pathways as described in the previous rule adopted under the previous administration last November.

The changes in reference to NMTEACH and the allowance of years spent teaching with an alternative license to count toward required years to apply for a level two license are both sensible changes.

We would, however, like to move forward on changes to 6.60.3 NMAC that create pathways that ensure all students are taught by teachers who have been fully trained through quality preparation programs and licensed through systems based on high and consistent professional standards.

A handwritten signature in cursive script that reads "Charles Bowyer". The signature is written in black ink and is positioned above the printed name.

Charles Bowyer

One License – Many Routes: NEA and Alternative Routes to Licensure

Improving state policies to recruit, retain, and reward quality teachers is essential if we are to offer a great public school to every student. NEA opposes fast-track alternate routes to licensure that not only fail to provide candidates the training they need to be successful educators, but also shortchange our students and cost states money they can ill afford for retraining or replacing poorly prepared teachers.

Every student deserves a high-quality teacher.

Debate about “traditional” versus “alternative” routes to the teaching profession may obscure a more troubling dilemma: the lack of rigorous

standards for teacher preparation and licensure that are required for all beginning teachers—regardless of the route taken to the profession. Quality public schools require knowledgeable and well-prepared teachers, but the lack of uniformly applied standards for beginning teachers jeopardizes the quality of instruction available to all students.

The National Education Association advocates for rigorous licensure standards for entry into the teaching profession. While coursework, field experience, and test score requirements vary by state, the one constant in the profession is a license to teach. All teachers must be licensed by the state in which they teach once they complete the specified courses. NEA believes these standards, ideally established by professional licensing boards, must include:

- Demonstrated high academic performance
- Extensive clinical experience
- Demonstrated knowledge of subject matter, pedagogy, and child development.

Research shows that teacher quality is the single most important school-related variable affecting student achievement.¹ Assuring that beginning teachers possess the knowledge and skills necessary to serve effectively as teachers of record means that preparation and licensure systems should be current, comprehensive, and enforced. Unfortunately, the unchecked proliferation of alternative route programs has resulted in a dizzying array of options for prospective teachers, some of which openly circumvent state standards. These licensure loopholes were created in response to selected teacher shortages, or as part of a broader strategy to deregulate the teaching profession.

NEA policy states that “Every candidate, including those entering the profession via alternative routes, should meet every standard prior to being granted a teaching license.”² NEA’s rejection of fast-track shortcuts to teaching that do not equip beginning teachers for effective practice is *not* a rejection of alternative routes to licensure. Rather, NEA recognizes the need for alternatives to the traditional preparation programs for mid-career recruits or others possessing substantial training and expertise in a discipline. Established standards governing teacher licensure must be consistent, regardless of the preparation and licensure route taken.

Most classroom teachers enter the profession through comprehensive teacher preparation

programs, most often four- or five-year university-based programs, which are structured to enable graduates to meet state licensing requirements. Alternative routes to licensure are typically more condensed training programs and often target individuals with certain subject area/content majors. There are programs for career changers, military retirees, undergraduates who want short-term commitments, and individuals who want to take a test and teach immediately. The ultimate goal for prospective teachers in both comprehensive and alternative route programs is the same: to obtain a state license to teach.

The teachers we need

Every student deserves a well-prepared teacher.

Approximately 200,000 teachers must be hired every school year to replace those who leave the profession, retire, or transfer to other schools.³ According to the National Center for Alternative Certification, the number of teachers entering the profession through alternative route programs almost tripled between 2001 and 2006, growing from 20,000 to almost 60,000 teachers annually.⁴ The growing number of teachers entering the profession through alternative routes and the range of experience each brings to the classroom creates new challenges for states and districts committed to recruiting and retaining quality educators.

NEA believes in the academic potential of all students and insists on high standards for teacher preparation and licensure to ensure that all students truly do have access to well-prepared teachers. To promote uniform quality, in 2008, NEA's Professional Standards and Practice Committee established the following criteria to govern all state licensure requirements – regardless of the route taken to meet them:

- Every candidate must obtain a bachelor's degree that includes a liberal arts curriculum that ensures adequate basic skills in reading, writing, and computation.

- Every candidate must have preparation in and demonstration of subject matter knowledge in core teaching area and have an academic major in that same teaching area.
- Every candidate must have preparation in and demonstration of professional and pedagogical skills, knowledge, and ability.
- Every candidate must participate in supervised clinical practice via an internship, student teaching, and/or mentoring program.
- Every candidate must participate in a new teacher induction program that includes mentoring from a qualified teacher in addition to support and/or mentoring from university faculty, school administrators, and new teacher peers.
- A candidate receives a full professional license only after demonstrating effective classroom practice as a teacher of record.

Recruiting and retaining well-prepared teachers to staff high-needs schools is especially challenging, but fast-track programs only exacerbate the problem of the “revolving door” of teacher turnover by emphasizing short-cut preparation and short-term commitments in the very environments that need teacher stability the most.

One promising strategy for attracting, developing, and retaining high-quality teaching recruits is the urban teacher residency model. Residency models incorporate critical components of NEA's policy into their programs in that they screen, recruit, and support talented college graduates who seek long-term teaching careers in urban school districts. The teacher residents participate in a year-long, paid residency during which they study under a master teacher, take coursework at a partner university, and ultimately teach in the master teacher's class. There is ongoing communication between the master teacher and the residency sponsor, with the candidate's field experience and coursework

leading to state licensure and a master's degree. Established programs currently exist in Denver, Boston, and Chicago.⁵

For all students to have access to well-prepared teachers, states must insist on the same high standards for all preparation programs. The National Council for the Accreditation of Teacher Education (NCATE), which has developed national standards for teacher preparation programs⁶, works with state agencies and educator groups to integrate its standards into state licensure systems. Through its professional accrediting process, NCATE determines which programs meet its rigorous standards for preparing teachers and other school specialists. It has experience working with both comprehensive and alternative preparation programs.

NEA's Principles of Professional Practice can guide policy decisions

Great public schools need great teachers.

Quality teacher preparation and licensing are not about the route chosen but about the training and experiences that these programs provide. To guide policymakers and educators in their development of systems to prepare, license, induct, and continually support classroom teachers, the NEA advances its *Principles of Professional Practice*. To meet the needs of the next generation of learners, we need teaching professionals who:

- Design and facilitate instruction that incorporates the students' developmental levels, skills, and interests with content knowledge.
- Develop collaborative relationships and partners with colleagues, families, and communities focused on meaningful and deep learning.
- Provide leadership and advocacy for students, quality education, and the education profession.
- Demonstrate in-depth content and professional knowledge.

- Participate in ongoing professional learning as an individual and within the professional learning community.
- Utilize multiple and varied forms of assessment and student data to inform instruction, assess student learning, and drive school improvement efforts.
- Establish environments conducive to effective teaching and learning.
- Integrate cultural competence and an understanding of the diversity of students and communities into teaching practice to enhance student learning.
- Utilize professional practices that recognize public education as vital to strengthening our society and building respect for the worth, dignity and equality of every individual.
- Strive to overcome the internal and external barriers that impact student learning.⁷

All students should be taught by teachers who have been fully trained through quality preparation programs and licensed through systems based on high and consistent professional standards. Fast-track preparation and licensure programs fail to address the components of quality teaching and do not assure a great public school for every student.

References

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² NEA Handbook, Resolution G-3, Licensure, 2008.

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Darling-Hammond, Linda, "A Future Worthy of Teaching For America," *Phi Delta Kappan*, June 2008, 730-736.

⁶ www.ncate.org/institutions/unitstandardsrubrics.asp?ch=

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Resources

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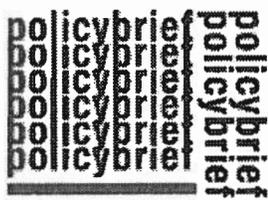
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