

## [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] NMAC 6.60.3; 6.60.7; 6.65.3

Yolanda Archambeault <yarchambeault@sfps.k12.nm.us>

Wed 6/26/2019 9:03 AM

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

Cc:Yolanda Archambeault <yarchambeault@sfps.k12.nm.us>;

Feedback Department Team:

I am a high school mathematics educator with 17 years teaching experience licensed through an alternative program. I spent 30 years in the military and brought those skills into the classroom. I have mentored several second career teachers.

It is my belief that alternative teacher licensing program is critical to fill the teacher vacancies. My biggest concern is that the internship time spent in the classroom is not what it should be. Current draft is written as indicated below

**6.65.3F.** EPPs shall conduct a minimum of three formally documented observations that include verbal and written feedback on the candidate's practice.

**(1)** Observations and evaluations of candidates shall be aligned with the four domains of EES:

**(a)** planning and preparation;

**(b)** creating an environment for learning;

**(c)** teaching for learning; and

**(d)** professionalism.

The way this is written it is to make it easier for the evaluation documents, but has little to do with the classroom management itself. Student management in the classroom is why people do not survive in the classroom. A person seeking an alternative license already has the professional knowledge what they do not have is how to manage the 27-32 different people in a classroom.

Planning and preparation lessons is build into the curriculum mapping, teaching the placement of skilled knowledge, and professionalism is the principals expectations. With the said the creating the environment for learning is the main area.

First this internships should be conducted in "**General Education**" regular classrooms not gifted, honors, or specialized programs where student has been pre-selected. New people to the field of teaching should be exposed to the everyday challenges:

Managing how the student is engaged. How to discipline fairly and with respect; How to diffuse tense situations; How to handle disinterest; How do respectfully handle cell phone abuse; How to stop students from doing other course homework in your class; How do handle the large number of students in the classroom; How much time it takes to counsel for grades; How much time it takes to grade work and provide feedback; How do you provide constructive informal feedback.

Teaching is so much more than standing and delivering; it is the awareness of how to approach and hone the readiness to accept learning on the part of the students. So in simple words it is the psychology of the human experience and how the brain learns.

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**Arch**

Yolanda Archambeault

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467-1073 (best time 4:00-4:30

Capital High School, Room G220

Department of Mathematics

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## [EXT] NMAC 6.65.3 Feedback

COE Assessment <coeassessment@unm.edu>

Tue 7/16/2019 3:30 PM

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

Cc:Deborah Rifenbary <riffer@unm.edu>; Madsen, Ann <madsen@unm.edu>; Smith, Frederick <smithxix@unm.edu>; Amy Korzekwa <akorzekw@unm.edu>;

 1 attachment

UNM Questions and Suggestions - revised NMAC 6.65.3 - 7-11-2019.docx;

Hello,

Our faculty have reviewed the proposed rule and have compiled some feedback. The majority of the feedback is questions for clarification. Please let us know if you have any questions about our feedback, or would like to discuss anything further.

Thank you,  
Amy

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Amy Korzekwa  
Director of Assessment and Accreditation  
College of Education  
University of New Mexico  
coeassessment@unm.edu  
[COE Data Request Form](#)

## UNM: Questions and Suggestions for the revised NMAC 6.65.3 – July 10, 2019

### 6.65.3.7

#### C. Clinical Experiences

- There is no distinction between all experiences in the field and full student teaching. Is this correct?

#### G. Cooperating Teacher

- What is the “necessary performance level”?
- What does it mean to be the primary evaluator?
  - CT conducts most of the observations? CT determines if candidate may graduate?
    - CT should have an influence over the candidate’s scores but should not be able to make the final decisions about the candidate completing the program.
    - Candidates with exceptional circumstances (intern licenses, changes in placements, etc.) may not have a CT who is able to be the primary evaluator.
  - *Suggestion: “and is an evaluator of the candidate along with the university supervisor.”*
    - Research suggests that evaluation is best done by dyads and triads, not a single assessor.
- What does “under the appropriate license” mean?
  - Does that include content area for secondary teachers?
  - Does it include license level?
- For alternative candidates, especially those on an intern license, not all of them have a Cooperating Teacher. Does this section apply to Mentor Teachers as well?
  - Mentor teachers are selected solely by the LEA, the EPP has no part of the process.

#### J. Day-one ready educator

- This term is unclear and potentially implies that the teacher is already performing at the level of an experienced teacher, rather than a well-prepared novice teacher.
  - *Suggestion: “Professionally prepared educator” or “Professional educator”.*

### 6.65.3.9

#### A. Entry Requirements

- What is the “approval process”?
- *Suggestion: Should “successful completion of the department’s required background check” be the “successful clearance of the department’s required background check”?*
  - Emphasizes that the candidate must pass the background check, not just complete it.

#### C. Parent and Family engagement

- Could you clarify what you are expecting in this section?
- Many of our schools do not allow student teachers to communicate with families.

#### F. Three formal observations

- Do these all need to be completed by the CT (if they are the primary evaluator)?
- Should each observation contain all 4 areas? Or should all 4 areas be observed/evaluated 3 times? Or 3 observations/evaluations containing at least one area?
- Do we need all 3 assessments occurring in the final semester of student teaching? Or can they occur throughout all the clinical experiences in the program?

#### G. Exit Requirements

- “(1) successful demonstration of competency in all relevant areas, subjects, or categories of NMTA”: Does this mean ALL licensure tests must be passed before candidates can graduate, including EAS, Content, and Pedagogy?

#### H. Support to candidates

- Could you spell out what are the licensure requirements, department processes, and assessments covered here?
- Does this apply to completers who have already left our program, or only to candidates still in the program?

#### 6.65.3.10

##### A. EARS

- “(1) the standards for entering and exiting the program” – Does this refer to requirements for entering and exiting, or educational standards like InTASC? If requirements, then the language is confusing.
- “(3) ... developmental coursework upon entering the program” – This question doesn’t make sense for us: if this is referring to remedial coursework and entering the teacher preparation program, then students should not be taking developmental coursework at this point. All developmental coursework should occur upon entry to the university, prior to applying to the teacher preparation program (especially if we have rigorous entry standards). Perhaps we are misunderstanding the question, or it will make sense for other EPPs.

##### B. Performance Objectives

- (6) – Does “teachers trained in technology” refer to computer science?

##### C. Completer Survey

- Should this be required of the EPPs if we are piloting one from the NMPED?

#### 6.65.3.11

##### C. Classifications

- “Industry leader” does not seem appropriate, as education is not an industry.
  - *Suggestion: “exemplary”, “exceptional”, “outstanding”*

#### **Additional Notes:**

As noted in the section on cooperating teachers: alternative licensure programs, particularly those who work with candidates with I-licenses, may require exceptions to some of these items. We recommend adding additional language to those sections explaining what they mean for alternative programs.

## [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>;

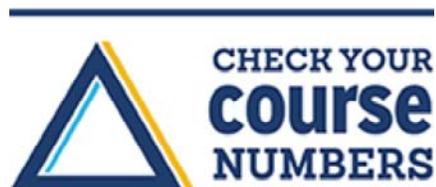
 2 attachments

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](http://www.cnm.edu/ccnc)

**TITLE 6        PRIMARY AND SECONDARY EDUCATION**  
**CHAPTER 65    SCHOOL PERSONNEL EDUCATOR PREPARATION**  
**PART 3        EDUCATOR PREPARATION PROGRAM ACCOUNTABILITY**

**6.65.3.1** ——— **ISSUING AGENCY:** Public Education Department, herein after the department.  
[6.65.3.1 NMAC – N, 7/1/2018]

**6.65.3.2** ——— **SCOPE:** This rule applies to all educator preparation programs serving candidates in New Mexico. If any part or application of this rule is held invalid, its remainder or application to other situations, shall not be affected.  
[6.65.3.2 NMAC – N, 7/1/2018]

**6.65.3.3** ——— **STATUTORY AUTHORITY:** Section 22-10A-19.2 NMSA 1978, Section 22-2-1 NMSA 1978, and Section 21-22E-3 NMSA 1978  
[6.65.3.3 NMAC – N, 7/1/2018]

**6.65.3.4** ——— **DURATION:** Permanent.  
[6.65.3.4 NMAC – N, 7/1/2018]

**6.65.3.5** ——— **EFFECTIVE DATE:** July 1, 2018, unless a later date is cited at the end of a section.  
[6.65.3.5 NMAC – N, 7/1/2018]

**6.65.3.6** ——— **OBJECTIVE:** To improve and strengthen the preparation of day-one ready New Mexico educators through streamlined evaluation, review, and approval of educator preparation programs in the state.  
[6.65.3.6 NMAC – N, 7/1/2018]

**6.65.3.7** ——— **DEFINITIONS:**

**A.** ——— **“Candidate”** means an individual enrolled in an educator preparation program for licensure offered through a department-approved educator preparation program provider.

**B.** ——— **“Certified review team”** means the team trained by the department to conduct comprehensive site visit reviews. Members of the certified review team may serve in multiple roles. The following shall be represented:

- (1) ——— a representative of the department;
- (2) ——— a dean from another department-approved educator preparation program;
- (3) ——— a director from another department-approved educator preparation program;
- (4) ——— a faculty member from another department-approved educator preparation program approved in New Mexico;
- (5) ——— a member of a local education agency administrative team; and
- (6) ——— a principal or eligible cooperating teacher from a local school.

**C.** ——— **“Clinical experience”** means the guided, hands-on application of knowledge and theory to actual practice through collaborative and facilitated learning activities taking place in field-based assignments.

**D.** ——— **“Clinical supervisor”** means the employee of the educator preparation program who works with and provides feedback to candidates during their clinical experience that is both trained and certified in NMTEACH and trained or experienced in the field in which they are supervising.

**E.** ——— **“Cohort”** means a set of individuals who enter an educator preparation program or exit an educator preparation program in the same year, or both.

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

**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. The department may allow an educator who recently relocated to New Mexico and does not yet have an NMTEACH evaluation to serve as a cooperating teacher if:

- (1) ——— the teacher has taught for at least three years; and

\_\_\_\_\_ (2) \_\_\_\_\_ the teacher is either nationally board certified or has an effectiveness rating on their out-of-state evaluation equivalent to highly effective or exemplary.

\_\_\_\_\_ **H.** \_\_\_\_\_ “**Comprehensive site visit review**” means the visit conducted by a certified review team to evaluate educator preparation program performance.

\_\_\_\_\_ **I.** \_\_\_\_\_ “**Day-one ready educator**” means a teacher who positively impacts measurable student achievement from the first day the educator begins teaching by demonstrating deep content knowledge, the ability to motivate and actively engage students, the ability to personalize learning based on students’ needs, and a willingness to engage in continuous efforts to improve teaching abilities.

\_\_\_\_\_ **J.** \_\_\_\_\_ “**Disposition**” means the level of professionalism demonstrated by a candidate indicating capacity to be a day-one ready educator.

\_\_\_\_\_ **K.** \_\_\_\_\_ “**Educator preparation program advisory board**” means the group of individuals appointed by the EPP who have unique knowledge regarding the educational needs of the local community.

\_\_\_\_\_ **L.** \_\_\_\_\_ “**Educator preparation program**” or “**EPP**” means an educational program offered by an educational preparation provider that is intended to lead to teacher licensure upon candidates’ successful completion of the program.

\_\_\_\_\_ **M.** \_\_\_\_\_ “**EPP provider**” means any individual, private or public education association, corporation, or institution of higher education offering an educator preparation program.

\_\_\_\_\_ **N.** \_\_\_\_\_ “**High-needs areas**” shall include one or more of the following:

\_\_\_\_\_ (1) \_\_\_\_\_ schools earning a “D” or “F” on the school grading system pursuant to 6.19.8 NMAC;

\_\_\_\_\_ (2) \_\_\_\_\_ schools with a high percentage of students qualifying as economically disadvantaged;

\_\_\_\_\_ (3) \_\_\_\_\_ schools with a high percentage of students qualifying for special education services;

\_\_\_\_\_ (4) \_\_\_\_\_ schools with a high percentage of students qualifying as English learners; or

\_\_\_\_\_ (5) \_\_\_\_\_ other schools determined by the department.

\_\_\_\_\_ **O.** \_\_\_\_\_ “**Initial approval**” means the first time an educator preparation program provider seeks and is granted approval from the professional practices and standards council to create a new educator preparation program in the state of New Mexico.

\_\_\_\_\_ **P.** \_\_\_\_\_ “**Local education agency**” or “**LEA**” means a school district or a state chartered charter school.

\_\_\_\_\_ **Q.** \_\_\_\_\_ “**New Mexico teacher assessments**” or “**NMTA**” means the tests required for individuals seeking initial New Mexico licensure.

\_\_\_\_\_ **R.** \_\_\_\_\_ “**NMTEACH educator effectiveness system**” or “**NMTEACH**” means the department-approved educator evaluation system defined in 6.69.8 NMAC that measures teacher performance on five components:

\_\_\_\_\_ (1) \_\_\_\_\_ improved student achievement;

\_\_\_\_\_ (2) \_\_\_\_\_ classroom observation;

\_\_\_\_\_ (3) \_\_\_\_\_ planning, preparation, and professionalism;

\_\_\_\_\_ (4) \_\_\_\_\_ student or parent surveys; and

\_\_\_\_\_ (5) \_\_\_\_\_ teacher attendance.

\_\_\_\_\_ **S.** \_\_\_\_\_ “**Professional practices and standards council**” or “**PPSC**” means the body that approves new educator preparation programs as defined in 6.2.8 NMAC.

\_\_\_\_\_ **T.** \_\_\_\_\_ “**Program revision**” means the addition of new licensure programming or modifications made to an existing department-approved educator preparation program including changes to standards.

\_\_\_\_\_ **U.** \_\_\_\_\_ “**Quality review rubric**” means the tool used by the certified review team during a comprehensive site visit review to determine an EPP’s status according to a series of aligned indicators and subcomponents that contribute to an overall rating on a five-level performance scale.

\_\_\_\_\_ **V.** \_\_\_\_\_ “**Revocation**” means the department decision to no longer recognize an educator preparation program as approved nor to license candidates completing coursework at the revoked educator preparation program within three semesters of revocation.

\_\_\_\_\_ **W.** \_\_\_\_\_ “**Scorecard**” means the annual report prepared and released by the department to rate educator preparation program performance on an A through F scale.

\_\_\_\_\_ **X.** \_\_\_\_\_ “**Theory of action**” means the collection of cause and effect relationships developed by the educator preparation program to guide and achieve demonstrable outcomes.

[6.65.3.7 NMAC – N, 7/1/2018]

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

\_\_\_\_\_ **A.** \_\_\_\_\_ EPP providers existing at the time of the enactment of 6.65.3 NMAC shall be required to reapply through the PPSC no later than the end of the 2018–2019 school year.

~~B.~~ EPP providers seeking a program revision for an existing department approved EPP and EPP providers seeking initial approval shall submit an application to the department to be reviewed by the PPSC.

~~C.~~ Applications shall provide the information outlined in the PPSC manual and meet the general requirements of 6.65.3.9 NMAC.  
[6.65.3.8 NMAC – N, 7/1/2018]

**6.65.3.9 EDUCATOR PREPARATION PROGRAM GENERAL REQUIREMENTS:** EPPs shall meet requirements as stated in state statute, regulation, and the following additional requirements:

~~A.~~ EPPs shall establish rigorous entry requirements including:

- ~~(1)~~ passage of all NMTA essential academic skills tests prior to admission;
- ~~(2)~~ candidate undergraduate grade point average of at least 2.75 on a 4.0 scale; and
- ~~(3)~~ successful completion of the department's required background check and approval process.

~~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.
- ~~(2)~~ The majority of clinical experiences shall align with the area, subject, or category of certification or license being sought by the candidate.
- ~~(3)~~ During at least one of candidates' multiple clinical experiences, candidates shall serve as a teacher in a school under the supervision of a cooperating teacher and plan and deliver independent instruction to students on a regularly scheduled basis.

~~C.~~ EPPs shall ensure that candidates embrace and execute upon their responsibility as educators to develop the skills and capacities to implement meaningful practices for parent and family engagement, notably 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:

~~D.~~ EPPs shall establish partnerships with stakeholder groups to fulfill requirements related to clinical experiences and meet the needs of LEAs. At a minimum, partners shall include:

- ~~(1)~~ classroom teachers;
- ~~(2)~~ principals;
- ~~(3)~~ superintendents;
- ~~(4)~~ human resource directors;
- ~~(5)~~ curriculum directors; and
- ~~(6)~~ the EPP advisory board.

~~E.~~ Programs for all teachers shall include instruction in pedagogy that is aligned with department standards pursuant to 6.61.2 NMAC through 6.61.12 NMAC.

~~F.~~ EPPs shall conduct a minimum of three formally documented observations that include verbal and written feedback on the candidate's practice:

~~(1)~~ Observations and evaluations of candidates shall be aligned with the four domains of NMTEACH:

- ~~(a)~~ planning and preparation;
- ~~(b)~~ creating an environment for learning;
- ~~(c)~~ teaching for learning; and
- ~~(d)~~ professionalism.

~~(2)~~ Results of evaluations shall inform program interaction with the candidate including feedback, placement, remediation, and support.

~~(3)~~ Documentation of observations shall be stored by the EPP for a minimum of five years after candidate completion and shall be available to the completer and the department upon request.

~~G.~~ EPPs shall establish rigorous exit requirements in alignment with those required to seek licensure from the department including:

- ~~(1)~~ successful demonstration of competency in all relevant areas, subjects, or categories of NMTA; and
- ~~(2)~~ a written recommendation from the EPP that the candidate demonstrates the dispositions necessary for success in the classroom and other learning environments.

~~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.

~~I. EPPs shall fully comply, in a timely manner, with all requirements that allow the department to generate a scorecard and conduct the comprehensive site visit review in accordance with 6.65.3.11 NMAC and 6.65.3.12 NMAC. [6.65.3.9 NMAC – N, 7/1/2018]~~

~~**6.65.3.10 ENTRY REQUIREMENTS THAT MAY BE WAIVED BY EDUCATOR PREPARATION PROGRAMS:** EPPs may waive entrance requirements outlined in Paragraphs (1) and (2) of Subsection A of 6.65.3.9 NMAC for certain candidates.~~

~~A. Candidates admitted under a waiver specific to Paragraph (1) of Subsection A of 6.65.3.9 shall be provided remedial services designed to support the candidate to pass all NMTA tests. Documentation of the remedial support provided to the candidate and documentation that the candidate passes all NMTA tests within one year of admittance under a waiver shall be available to the department upon request. For each cohort, waivers for candidates who do not pass the NMTA essential academic skills tests or for candidates not meeting the required minimum GPA shall not exceed ten percent in each category.~~

~~B. EPPs shall provide support, as needed, to candidates admitted under a waiver.~~

~~C. Candidates admitted under waivers who do not meet the entry requirements outlined in Subsection A of 6.65.3.9 NMAC within one year of enrollment shall be exited from the EPP. EPPs shall not readmit said candidates until they meet all requirements of Subsection A of 6.65.3.9 NMAC. [6.65.3.10 NMAC – N, 7/1/2018]~~

~~**6.65.3.11 EDUCATOR PREPARATION PROGRAM SCORECARDS:** The department shall issue an annual scorecard to each department-approved EPP in the state of New Mexico. EPPs earning initial approval after the enactment of 6.65.3 NMAC shall be issued their first scorecard after the completion of their first two years of operation.~~

~~A. The EPP scorecard shall:~~

- ~~(1) evaluate the effectiveness of the EPP;~~
- ~~(2) rate EPP performance on an A through F scale;~~
- ~~(3) be issued annually by the department for all EPPs with at least 10 candidates; and~~
- ~~(4) be publicly released by the department.~~

~~B. The scorecard shall be organized into four domains:~~

- ~~(1) admissions;~~
- ~~(2) candidate promise;~~
- ~~(3) hiring and retention; and~~
- ~~(4) graduate performance.~~

~~C. The department shall, in the technical manual, state which specific indicators shall be included in the calculations for the domains defined in Subsection B of 6.65.3.11 NMAC. The technical manual shall be published annually on the department website prior to the release of the scorecards and in accordance with memoranda of understanding between the EPPs and the department.~~

~~D. The indicators measured by the department shall include the following:~~

- ~~(1) acceptance rate;~~
- ~~(2) candidate aptitude based on department-approved assessments;~~
- ~~(3) diversity of cohort;~~
- ~~(4) candidate performance on licensure tests;~~
- ~~(5) hiring and retention rates for completers teaching in New Mexico;~~
- ~~(6) multiple measures of effectiveness of completers, as measured by NMTEACH;~~
- ~~(7) student growth based on department-approved assessments;~~
- ~~(8) student achievement based on department-approved assessments;~~
- ~~(9) completers serving in high needs areas;~~
- ~~(10) candidate perception surveys; or~~
- ~~(11) employer perception surveys.~~

~~[6.65.3.11 NMAC – N, 7/1/2018]~~

~~**6.65.3.12 COMPREHENSIVE SITE VISIT REVIEW PROCESS:** EPPs shall fully cooperate with the comprehensive site visit review process. The department shall develop an EPP manual outlining the comprehensive site visit process that shall include all documents necessary for the site visit review. Site visits shall occur every four years on a calendar determined by the department unless the status of a program, as outlined in 6.65.3.13 NMAC,~~

changes in a way that merits more frequent visits. EPPs receiving initial approval after the enactment of 6.65.3 NMAC shall participate in their first comprehensive site visit review after the completion of their first two years of operation.

A. The comprehensive site visit review process shall assess the performance of the EPP on the four components of the quality review rubric:

- (1) curriculum design and delivery;
- (2) clinical experience;
- (3) candidate quality; and
- (4) continuous improvement.

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;
- (b) quality review worksheets for each of the four key components on the quality review rubric; and

(c) data and artifacts listed as supplemental evidence in the EPP manual accompanied by any releases for such information, if necessary.

(2) **Site visit.** The certified review team shall conduct the site visit and review the EPP using the quality review rubric.

(3) **Summative conference.** The certified review team shall debrief the site visit with the EPP and present their initial findings.

C. At the end of the comprehensive site visit review process, the EPP shall be assessed on its overall performance and shall be rated with one of following site visit classifications defined in the EPP manual:

- (1) industry leader;
- (2) well-developed;
- (3) proficient;
- (4) developing; or
- (5) underdeveloped.

D. The certified review team shall release a final written report to the EPP containing the EPP's scores on each component of the quality review rubric and their overall performance no later than 90 calendar days after the comprehensive site visit review.

E. EPPs shall have 14 calendar days after receiving the report to submit a response, in writing, to the department to indicate any alleged factual errors and to provide any documentation deemed necessary to support the allegations. If, after review of the EPP's response, the department determines the error to be valid, the report shall be amended within 20 calendar days.

[6.65.3.12 NMAC - N, 7/1/2018]

**6.65.3.13 DETERMINATION OF EPP STATUS:** The scorecard grade and the site visit classification shall determine whether an EPP earns approval for continued operation, is placed on probation, or has its approval revoked. The EPP status shall determine the frequency of comprehensive site visit reviews and the scope of EPP responsibilities. EPPs shall be notified of their status by the department no later than November 30 annually.

A. **Approval for continued operation.** Approval for continued operation shall be granted to EPPs earning a C or better on the department scorecard and proficient or better on the comprehensive site visit review. Approval for continued operation shall last four years unless the EPP scorecard grade falls below a C during the four year approval period. Any approved EPP falling below a C during their approval period shall have their status changed to probation.

B. **Probation.** EPPs shall be placed on probation if they earn less than a C on the department scorecard or below proficient on the comprehensive site visit review. During the two-year probation period, EPPs shall not be eligible to seek approval for new programs from the PPSC. EPPs may continue to accept candidates for entry while on probation.

- (1) Responsibilities of EPPs on probation shall include:
- (a) development of an improvement plan that addresses program deficiencies that shall be submitted to the department for approval within 90 calendar days of notification of probation status;
  - (b) annual submittal of a report to the department detailing progress made on the improvement plan;

\_\_\_\_\_ (c) participation in a comprehensive site visit review at the end of the two-year probation period;

\_\_\_\_\_ (d) participation in professional development and technical assistance prescribed by the department; and

\_\_\_\_\_ (e) individual, written notification informing current candidates of the EPP's probation status within 30 calendar days of department notification.

\_\_\_\_\_ (2) Probation shall last two years unless the EPP scorecard grade improves to a C or above after the first year of probation.

\_\_\_\_\_ (3) The department shall monitor the EPP's progress toward improving the areas noted in the comprehensive site review process throughout the probationary period by reviewing the required data reports and conducting monitoring visits as deemed necessary by the department.

\_\_\_\_\_ (4) Any EPP not exiting probation after the conclusion of the two-year probation period may be moved to a status of revocation or may be granted an additional year of probation. EPPs on a third year of probation shall:

\_\_\_\_\_ (a) participate in an additional comprehensive site visit review at the end of the third year of probation;

\_\_\_\_\_ (b) provide documentation of candidate notification of continued probation to the department; and

\_\_\_\_\_ (c) cease acceptance of new candidates.

\_\_\_\_\_ (5) EPPs not making necessary improvements to exit probation after three years on probation shall have their status changed to revocation.

**C. Revocation.**

\_\_\_\_\_ (1) The department may revoke an EPP's approval for any of the following reasons:

\_\_\_\_\_ (a) earning a grade of F on the scorecard or underdeveloped on the comprehensive site visit review;

\_\_\_\_\_ (b) not exiting probation status;

\_\_\_\_\_ (c) failing to meet reporting or compliance requirements as set forth by statute, department regulation, or guidance provided in department manuals; or

\_\_\_\_\_ (d) having 10 or fewer completers for at least two consecutive years.

\_\_\_\_\_ (2) The department shall notify EPPs of revocation in writing. Immediately upon receipt of a notice of revocation, the EPP shall:

\_\_\_\_\_ (a) cease recruitment and acceptance of new candidates;

\_\_\_\_\_ (b) allow candidates currently enrolled in the EPP to complete the licensure program, provided they complete the program within three semesters of the notice of revocation; and

\_\_\_\_\_ (c) work with candidates unable to complete the licensure program within three semesters by providing options for transfer to another EPP.

\_\_\_\_\_ (3) An EPP provider that has received a notice of revocation may file a request for reconsideration by the department no later than 30 calendar days after the notice of revocation has been received.

\_\_\_\_\_ (a) The department shall review the materials submitted by the EPP provider including written statements of position, documents, and comments supporting the claim.

\_\_\_\_\_ (b) The department, after considering the request, shall make a decision and inform the EPP provider in writing of its decision within 60 calendar days of receipt of the request for reconsideration.

\_\_\_\_\_ (c) The decision of the department shall be final.

\_\_\_\_\_ (4) An EPP with revoked approval shall wait two years following the date of revocation before reapplying via the application process defined in 6.65.3.8 NMAC. [6.65.3.13 NMAC - N, 7/1/2018]

**History of 6.65.3 NMAC: [RESERVED]**

**6.65.3.1 ISSUING AGENCY:** Public Education Department, hereinafter the department. [6.65.3.1 NMAC - Rp, 8/13/2019]

**6.65.3.2 SCOPE:** All educator preparation programs serving candidates in New Mexico. [6.65.3.2 NMAC - Rp, 8/13/2019]

**6.65.3.3 STATUTORY AUTHORITY:** Section 22-2-1 NMSA 1978, Section 22-2-2 NMSA 1978, Section 22-10A-19.2 NMSA 1978, and Section 21-22E-3 NMSA 1978.  
[6.65.3.3 NMAC - Rp, 8/13/2019]

**6.65.3.4 DURATION:** Permanent.  
[6.65.3.4 NMAC - Rp, 8/13/2019]

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

**6.65.3.6 OBJECTIVE:** To improve the preparation of day-one ready New Mexico educators through streamlined evaluation, review, and approval of educator preparation programs in the state.  
[6.65.3.6 NMAC - Rp, 8/13/2019]

**6.65.3.7 DEFINITIONS:**

**A. "Candidate"** means an individual enrolled in an EPP for licensure offered through a department-approved EPP provider.

**B. "Certified review team"** means the team trained by the department to conduct comprehensive state EPP approvals. Members of the certified review team may serve in multiple roles. The following shall be represented:

- (1) a representative of the department;
- (2) a dean or director from another department-approved educator preparation program;
- (3) a faculty member from another department-approved educator preparation program approved in New Mexico;
- (4) a member of a local education agency administrative team; and
- (5) a principal or eligible cooperating teacher from a local public school.

**C. "Clinical experience"** means the guided, hands-on application of knowledge and theory to actual practice through collaborative and facilitated learning activities taking place in field-based assignments.

**D. "Clinical supervisor"** means the employee of the EPP who works with and provides feedback to candidates during their clinical experience who is both trained and certified in the department-approved educator effectiveness system and trained or experienced in the field in which they are supervising.

**E. "Completer"** means a candidate who earns a certificate or diploma from an EPP approved by the department.

**F. "Cooperating teacher"** means an educator who meets the following qualifications:

- (1) is employed by a LEA;
- (2) is mutually selected by the LEA and the EPP;
- (3) has at least three years of experience under the appropriate license;
- (4) is the primary evaluator of the candidate during their clinical experience; and
- (5) either meets the necessary performance level as defined by the department on their

educator effectiveness report or for an educator who recently relocated to New Mexico and does not yet have an educator effectiveness report to have met one of the following requirements:

- (a) the teacher is a level three teacher with a minimum of six years teaching experience; or
- (b) the teacher is a nationally board certified teacher.

**G. "Comprehensive state approval"** means the process conducted by the certified review team to evaluate and approve educator preparation programs.

**H. "Comprehensive state approval site visit"** means the visit conducted by a certified review team to evaluate educator preparation program performance for certification.

**I. "Day-one ready educator"** means a teacher who positively impacts measurable student success from the first day the educator begins teaching by demonstrating deep content knowledge, the ability to motivate and actively engage students, the ability to personalize learning based on students' needs, and a willingness to engage in continuous efforts to improve teaching abilities.

**J. "Disposition"** means the professionalism demonstrated by a candidate indicating capacity to be a day-one ready educator.

**K. "EAR"** means educator accountability report required annually and designed to create a uniform statewide educator accountability reporting system to measure and track teacher and administrator education

Commented [TS1]: What department?

Commented [AC2]: This needs to be defined. What is the "necessary performance level." It should be mutually defined by the EPPs and the department.

Commented [TS3]: This needs to be defined as day 1 teaching AFTER program completion. Many teachers start teaching before completing a program and will not have these skills until program completion.

candidates from pre-entry to post-graduation in order to benchmark the productivity and accountability of New Mexico's educator workforce.

**L.** “**Educator preparation program advisory board**” means the group of individuals appointed by the EPP who have unique knowledge regarding the educational needs of the local community.

**M.** “**EPP**” means an educational preparation program offered by an educational preparation provider that is intended to lead to teacher licensure upon candidates’ successful completion of the program.

**N.** “**EPP application**” means a written request on a department approved form, to the PPSC to be a department approved EPP.

**O.** “**EPP provider**” means any individual, private or public education association, corporation, or institution of higher education offering an EPP.

**P.** “**EES**” means the department-approved educator evaluation system.

**Q.** “**Initial approval**” means the first time an educator preparation program provider seeks and is granted approval from the professional practices and standards council to create a new educator preparation program in the state of New Mexico.

**R.** “**LEA**” means a local educational agency. An LEA may be a public school district, a state-chartered charter school, or a state-educational agency.

**S.** “**New Mexico teacher assessments**” means the tests required for individuals seeking initial New Mexico licensure.

**T.** “**PPSC**” means the professional practices and standards council, which approves EPP programs as defined in 6.2.8 NMAC.

**U.** “**Program revision**” means the addition of new licensure programming or modifications made to an existing department-approved educator preparation program including changes to standards.

**V.** “**Quality review rubric**” means the department-approved tool used by the certified review team during a comprehensive state approval site visit.

**W.** “**Revocation**” for the purposes of this rule, means a department decision to no longer recognize an EPP as approved by the department nor to license candidates completing coursework at the revoked EPP provider within three semesters of revocation.

**X.** “**Theory of action**” means the collection of cause and effect relationships developed by the educator preparation program to guide and achieve demonstrable outcomes.  
[6.65.3.7 NMAC - Rp, 8/13/2019]

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

**A.** EPP providers seeking a program revision for an existing department-approved EPP and EPP providers seeking initial approval of an EPP shall submit an EPP application to the department.

**B.** Applications shall provide the information outlined in the PPSC manual and meet the general requirements of rule 6.65.3.9 NMAC.

#### **6.65.3.9 EDUCATOR PREPARATION PROGRAM GENERAL REQUIREMENTS:** EPPs shall meet requirements as stated in state statute, regulation, and the following additional requirements.

**A.** EPPs shall establish rigorous entry requirements including a successful completion of the department’s required background check and approval process.

**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.

(2) The majority of clinical experiences shall align with the area, subject, or category of certification or license being sought by the candidate.

(3) During at least one of the candidate’s multiple clinical experiences, candidates shall serve as a teacher in a school under the supervision of a cooperating teacher and plan and deliver independent instruction to students on a regularly scheduled basis.

**C.** EPPs shall ensure that candidates embrace and execute upon their responsibility as educators to develop the skills and capacities to implement meaningful practices for parent and family engagement, notably 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.

**D.** EPPs shall establish partnerships with stakeholder groups to fulfill requirements related to clinical experiences and meet the needs of LEAs. At a minimum, partners shall include:

(1) classroom teachers;

**Commented [TS4]:** Will this be included in the legislation so it is transparent and not changed or modified?

**Commented [TS5]:** If a background check is required for entry requirements, NMPED will need to provide clearance upon receipt of the background check to EPPs. EPPs are not responsible for clearing background checks, this lies with the NMPED and the districts.

- (2) principals;
- (3) superintendents;
- (4) human resource directors;
- (5) curriculum directors; and
- (6) the EPP advisory board.

**E.** Programs for all teachers shall include instruction in pedagogy that is aligned with department standards pursuant to 6.61.2 NMAC through 6.61.12 NMAC.

**F.** EPPs shall conduct a minimum of three formally documented observations that include verbal and written feedback on the candidate's practice.

(1) Observations and evaluations of candidates shall be aligned with the four domains of EES:

- (a) planning and preparation;
- (b) creating an environment for learning;
- (c) teaching for learning; and
- (d) professionalism.

(2) Results of evaluations and observations shall inform program interaction with the candidate including feedback, placement, remediation, and support.

(3) Documentation of observations shall be stored by the EPP for a minimum of five years after candidate completion and shall be available to the completer and the department upon request.

**G.** EPP providers shall establish rigorous exit requirements in alignment with those required to seek licensure from the department. These exit requirements must, at a minimum, include:

- (1) successful demonstration of competency in all relevant areas, subjects, or categories of New Mexico teacher assessments; and
- (2) a written recommendation from the EPP that the candidate demonstrates the dispositions necessary for success in the classroom and other learning environments.

**H.** EPP providers shall detail in the EPP application how the EPP provider plans to provide support to the candidates regarding the passage of all teaching licensure requirements, department processes, and assessments.

**I.** In a form approved by the department and no later than September 1, all EPPs shall annually submit candidate level data required by the EAR. Failure to comply with data reporting and collection requests may result in revocation of the EPP's approval.

**J.** EPPs shall fully comply, in a timely manner, with all requirements that allow the department to generate the EAR and the comprehensive state approval.  
[6.65.3.9 NMAC - Rp, 8/13/2019]

**6.65.3.10 EDUCATOR ACCOUNTABILITY REPORT:**

**A.** Each educator preparation program's annual EAR shall include the following information and indicators of program success:

- (1) the standards for entering and exiting the program;
- (2) the number of hours required for clinical experience;
- (3) the number and percentage of candidates needing developmental course work upon entering the program;
- (4) the number and percentage of completers for each program;
- (5) the number and types of degrees received by completers;
- (6) the number and percentage of completers who pass the New Mexico teacher assessments for initial licensure on the first attempt;
- (7) a description of each program's placement practices;
- (8) the number and percentage of completers hired by New Mexico school districts; and
- (9) the demographics of an EPP's candidates and completers.

**B.** The educator accountability report shall include an evaluation plan that includes high performance objectives. The plan shall include objectives and measures for increasing the following:

- (1) student achievement for all students;
- (2) teacher and administrator retention, particularly in the first three years of a teacher's or administrator's career;
- (3) the percentage of students who pass the New Mexico teacher assessments for initial licensure on the first attempt;

**Commented [TS6]:** This is not applicable for alternative licensure programs

**Commented [TS7]:** This is not applicable for alternative licensure programs. We issue certificates.

**Commented [TS8]:** This is only available through the testing company, Title II, and NMPED. EPPs do not have this data.

**Commented [TS9]:** Will this be provided by state? EPPs cannot track students beyond program completion accurately.

(4) the percentage of secondary school classes taught in core academic subject areas by teachers who demonstrate by means of rigorous content area assessments a high level of subject area mastery and a thorough knowledge of the state's academic content and performance standards;

(5) the percentage of elementary school classes taught by teachers who demonstrate by means of a high level of performance in core academic subject areas their mastery of the state academic content and performance standards;

(6) the number of teachers trained in math, science and technology;

(7) the number of teachers trained in special education;

(8) the number of teachers teaching in low socioeconomic schools; and

(9) the number of teachers retained in teaching in New Mexico.

C. EPPs shall administer a completer survey that measures the completer's perception of their own readiness and individual effectiveness in the classroom.

D. EPPs shall initiate all necessary data requests to fill EAR requirements and shall be responsible for collecting, analyzing, and reporting data.  
[6.65.3.11 NMAC - Rp, 8/13/2019]

**Commented [AC10]:** Many of the data points are outside of EPP (ex. first time pass rates). This needs to be changed to be a collaborative process with the department and the EPP to fulfill the data requests.

**6.65.3.11 COMPREHENSIVE STATE APPROVAL VISITS:** EPPs shall fully cooperate with the comprehensive state approval process. The department shall develop and publish on the department website an EPP manual outlining the comprehensive site visit process that shall include all documents necessary for the state approval. Site visits shall occur every three years on a calendar determined by the department unless the status of a program, as outlined in 6.65.3.13 NMAC, changes in a way that merits more frequent visits.

**Commented [TS11]:** How far in advance will it be available for EPPs to prepare? A minimum of 6 months before a site visit.

A. The comprehensive state approval process shall assess the performance of the EPP on the four components of the quality review rubric:

(1) curriculum design and delivery;

(2) clinical experience;

(3) candidate quality; and

(4) continuous improvement.

**Commented [TS12]:** What constitutes candidate quality?

B. The comprehensive state approval site visit 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 4 weeks prior to the site visit. Documents shall include:

(a) quality review rubric;

(b) quality review worksheets for each of the four key components on the quality

review rubric; and

(c) data and other documentation listed as supplemental evidence in the EPP

manual accompanied by any releases for such information, if necessary.

(2) Comprehensive state approval site visit. The certified review team shall conduct the site visit and review the EPP using the quality review rubric.

(3) Summative conference. The certified review team shall debrief the site visit with the EPP and present their initial findings.

C. At the end of the comprehensive state approval site visit, the EPP shall be assessed on its overall performance and shall be rated with one of following site visit classifications defined in the EPP manual:

(1) industry leader;

(2) well-developed;

(3) proficient;

(4) developing; or

(5) underdeveloped.

D. The certified review team shall release a final written report to the EPP containing the EPP's scores on each component of the quality review rubric and their overall performance no later than 90 calendar days after the comprehensive state approval site visit.

E. EPPs shall have 14 calendar days after receiving the report to submit a response, in writing, to the department to indicate any alleged factual errors and to provide any documentation deemed necessary to support the allegations. If, after review of the EPP's response, the department determines the error to be valid, the report shall be amended within 20 calendar days.  
[6.65.3.12 NMAC - Rp, 8/13/2019]

**Commented [TS13]:** At a minimum, the self-evaluation documents should be available 6 months in advance of visit. Many departments have few staff and will need sufficient time to complete the process.

**Commented [TS14]:** Can something be added about how long in advance it will be available before a visit? The rubric will need to be published and sent with other materials 6 months in advance.

**Commented [TS15]:** This time frame is extremely short. CNM recommends 60 days to respond. If someone is out on leave or at the beginning or end of the term this will be impossible to meet.

**6.65.3.12 COMPREHENSIVE STATE APPROVAL PROCESS:** The comprehensive state approval process shall determine whether an EPP earns approval for continued operation, is placed on probation, or has its approval revoked. The EPP status shall determine the frequency of comprehensive state approval site visits and the scope of EPP responsibilities. EPPs shall be notified of their status by the department no later than November 30 annually.

**A.** Level one probation. EPPs shall be placed on level one probation if the EPP fails to demonstrate progress toward meeting objectives included in its EAR or if the certified review team identifies an issue during the comprehensive state approval site visit resulting in an underdeveloped designation outlined in Subsection C of 6.65.3.12 NMAC. The secretary shall notify the EPP of level one probation status in writing. Responsibilities of EPPs on level two probation shall include the following:

(1) participation in professional development and technical assistance prescribed by the department;

(2) development of an improvement plan that addresses program deficiencies that shall be submitted to the certified review team for approval within 90 calendar days of notification of level one probation status; and

(3) participation in department monitoring to ensure implementation and progress as outlined in the approved improvement plan.

(4) An EPP may exit level one probation after one academic year and upon fulfillment of its probationary responsibilities and demonstration of progress toward EAR objectives.

**B.** Level two probation. EPPs shall be placed on level two probation if the EPP fails to demonstrate substantial progress outlined in the improvement plan. The secretary shall notify the EPP of level two probation status in writing. Responsibilities of EPPs on level three probation shall include the following:

(1) participation in professional development and technical assistance prescribed by the department;

(2) development or amendment of an improvement plan that addresses program deficiencies that shall be submitted to the certified review team for approval within 90 calendar days of notification of level two probation status;

(3) participation in department monitoring to ensure implementation and progress as outlined in the approved improvement plan; and

(4) participation in an annual state approval site visit until EPP exits level two probation.

(5) An EPP may exit level two probation to level one probation after one academic year and upon fulfillment of its probationary responsibilities and demonstration of progress toward EAR objectives.

**C.** Revocation.

(1) The department may revoke an EPP's approval for any of the following reasons:

(a) not exiting probation status; or

(b) failing to meet reporting or compliance requirements as set forth by statute, department regulation, or guidance provided in department manuals.

(2) The department shall notify EPP providers of revocation in writing. Immediately upon receipt of a notice of revocation, the EPP provider shall:

(a) cease recruitment and acceptance of new candidates;

(b) allow candidates currently enrolled in the EPP to complete the licensure program, provided they complete the program within three semesters of the notice of revocation; and

(c) work with candidates unable to complete the licensure program within three semesters by providing options for transfer to another EPP.

(3) An EPP provider that has received a notice of revocation may file a request for reconsideration by the department no later than 30 calendar days after the notice of revocation has been received.

(a) The department shall review the materials submitted by the EPP provider for reconsideration including written statements of position, documents, and comments supporting the claim.

(b) The department, after considering the request, shall make a decision and inform the EPP provider in writing of its decision within 60 calendar days of receipt of the request for reconsideration.

(c) The decision of the department shall be final.

(4) An EPP with revoked approval shall wait two years following the date of revocation before reapplying via the application process defined in 6.65.3.8 NMAC.

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

**History of 6.65.3 NMAC: [RESERVED]**

Commented [TS16]: Why is level two under level 1? TYPO?

Commented [TS17]: Over what time frame every 60 days?

Commented [TS18]: Why level 3 listed in level II? Is there a level III probation?

Commented [TS19]: Is there no way to be completely remove from level 2 probation if improvement is exceptional?

Commented [TS20]: For how many years?

Commented [TS21]: Who in department will make this decision?

6.65.3 NMAC, Educator Preparation Program Accountability, filed 7/1/2018 - was repealed and replaced by 6.65.3 NMAC, Educator Preparation Program Accountability, effective 8/13/2019.

DRAFT

## [EXT] 6.65.3 EPP Accountability

Jerry Harmon <jrh010352@gmail.com>

Fri 7/26/2019 1:33 PM

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

### Overall Comments:

1. The rule does not provide a deadline or schedule for existing NMPED approved EPP's to renew their approval under the provisions of the rule.
2. The deadline for submitting the EARS on September 1 of each year does not provide sufficient time to accrue the best current year data. A spring date could provide more current data.
3. The rubrics provided in the manual for NMPED EPP approval are substandard to the Council for the Accreditation Educator Preparation (CAEP) which are national standards. There are currently 38 states in partnership with CAEP for accreditation purposes.
  - a. The substandard NMPED elements include but are not limited to 1) nationally recognized and rigorously trained peer review teams vs. in-state teams which have conflicts of interest inherent with NM public HED institutions, 2) assessments of teacher candidates and completers require a higher standard of validity and reliability, 3) standard rubrics in CAEP are written with higher actionable expectations, 4) use of technology and expectations for diversity are better articulated and integrated throughout program expectations, and 5) the co-construction and continuous improvement expectations of the EPP with k-12 stakeholders is higher than simpler advisory intentions stated in the NMPED manual.
4. Since 5 (five) of the 4 year universities already have CAEP accreditation (UNM, NMSU, WNMU, NNMC, and NMHU) and all except ENMU are seeking reaccreditation, the NMPED should create a state partnership with CAEP as in the past. A partnership streamlines and enhances significant efficiency for the time, effort and expenditures burdened by the institutions. CAEP also has a longer period of accreditation term of 7 years. And as state above, have more rigorous expectations leading to better qualified candidates on their first day.
  - a. While these comments outline that the 4 year institutions should be exempt from this rule (in lieu of a CAEP state partnership), they do need to participate in the annual EARS reporting process.
5. Since the community colleges also require an NMPED EPP approval [process and typically find the CAEP process too problematic and not practical to their limited programs, NMAC 6.65.3 should be adopted for community college EPP NMPED approval.

I am available for further explanation if desired.

*JHarmon*

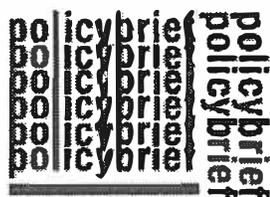
Dr. Jerry Harmon  
575-219-1102  
Retired Dean and Professor of Education  
Eastern New Mexico University

Sent from [Mail](#) for Windows 10

# 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.*

**E**very 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.<sup>1</sup> 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.”<sup>2</sup> 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.<sup>3</sup> 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.<sup>4</sup> 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.<sup>5</sup>

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 programs<sup>6</sup>, 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.<sup>7</sup>

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

<sup>1</sup> National Commission on Teaching and America's Future (NCTAF), *What Matters Most: Teaching for America's Future*. New York: New York, 1996, [www.nctaf.org/documents/WhatMattersMost.pdf](http://www.nctaf.org/documents/WhatMattersMost.pdf).

<sup>2</sup> NEA Handbook, Resolution G-3, Licensure, 2008.

<sup>3</sup> "The Power of Preparation: Teacher Training Gives New Educators a Head Start," *Edutopia.org*, August 2001, [www.edutopia.org/power-preparation](http://www.edutopia.org/power-preparation).

<sup>4</sup> National Center for Alternative Certification, *Overview of Alternative Routes to Teacher Certification in Alternative Teacher Certification: A State-by-State Analysis* 2008.

<sup>5</sup> Berry, B., Montgomery, D., Curtis, R., Hernandez, M., and J. Wurtzel. *Creating and Sustaining Urban Teacher Residencies: A New Way to Recruit, Prepare, and Retain Effective Teachers in High-Needs Districts*, The Aspen Institute and Center for Teaching Quality, August 2008, [www.aspeninstitute.org/atf/cf/%7Bdeb6f227-659b-4ec8-8f84-8df23ca704f5%7D/CREATINGANDSUSTAININGUTR.FINAL.PDF](http://www.aspeninstitute.org/atf/cf/%7Bdeb6f227-659b-4ec8-8f84-8df23ca704f5%7D/CREATINGANDSUSTAININGUTR.FINAL.PDF)

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

<sup>6</sup> [www.ncate.org/institutions/unitstandardsrubrics.asp?ch=](http://www.ncate.org/institutions/unitstandardsrubrics.asp?ch=)

<sup>7</sup> NEA Professional Standards and Practice Committee, *Principles of Professional Practice*, Washington, DC, Adopted July 2008.

## Resources

**Center for Teaching Quality (CTQ)** seeks to improve student learning and advance the teaching profession by promoting teacher leadership, conducting timely research, and crafting policy — all in an effort to ensure that every student in America has a qualified, well-supported, and effective teacher. [www.teachingquality.org](http://www.teachingquality.org)

**National Council for the Accreditation of Teacher Education (NCATE)** is the profession's mechanism to help establish high quality teacher preparation. NCATE's performance-based system of accreditation seeks to foster competent classroom teachers and other educators who work to improve the education of all P-12 students. NCATE believes every student deserves a caring, competent, and highly qualified teacher. [www.ncate.org](http://www.ncate.org)

**National Center for Alternative Certification (NCAC)** is a clearinghouse for information about alternative routes to certification in the United States. Through a toll-free call center and an interactive Web site, NCAC provides answers to questions and guidance for individuals interested in becoming teachers, as well as for policymakers, legislators, educators, researchers, and members of the public. [www.teach-now.org](http://www.teach-now.org)

