

Concise Explanatory Statement For Rulemaking Adoption:

Findings required for rulemaking adoption:

Findings MUST include:

- Reasons for adopting rule, including any findings otherwise required by law of the agency, and a summary of any independent analysis done by the agency;
- Reasons for any change between the published proposed rule and the final rule; and
- Reasons for not accepting substantive arguments made through public comment.

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Specific statutory or other authority authorizing rulemaking:
Sections 22-2-1, 22-2-2, and 22-10A-6 NMSA 1978.

Rule adoption date:
December 15, 2021

Rule effective date:
December 28, 2021

Reasons for adopting rule:

The rule establishes pathways and competencies for secondary teachers to earn an endorsement in computer science, supporting effective computer science instruction in seventh through 12th grade.

Reasons for any change between the published proposed rule and the final rule:

Changes between the published proposed rule and the final rule reflect requests submitted during the public comment period to clarify language and incorrect section numbering.

The department reviewed and considered all written and oral feedback submitted during the public comment period. For the department's response to public comment, please see "6.64.20 NMAC, Response to Public Comment," attached.

Issuing authority (If delegated, authority letter must be on file with ALD):

Name:

Gwen Perea Warniment, Ph.D.

Check if authority has been delegated

Title:

Deputy Secretary of Teaching, Learning, and Assessment

Signature: (BLACK ink only OR Digital Signature)

Date signed:

DocuSigned by:

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12/15/2021

Response to Public Comment
6.64.20 NMAC, Competencies for Secondary Computer Science Teachers



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Public Comment Period: October 26, 2021 – November 29, 2021

The New Mexico Public Education Department (PED) received eight public comments for 6.64.20 NMAC, Competencies for Secondary Computer Science Teachers. All substantive comments have been summarized below. Comments that are not substantive in nature or fall outside the scope of the rule have not been included.

Rigor of Pathways	
Summary of Comments	PED Response
An industry certification is not as rigorous as the licensure exam, 15 college credits, 60 hours of professional development, or two years of teaching experience.	PED staff understand these comments arise from a genuine desire to create high expectations for teachers and students. However, PED staff believes the inclusion of work experience, industry certifications, teaching experience, and professional development are important pathways to recruit and expand opportunities for prospective computer science teachers. All teachers will still need to meet the minimum requirements for licensure, and two of the “grandfather” pathways will sunset on January 1, 2025.
The “grandfather” pathways, including two years of work experience, an industry certification, 60 hours of professional development, and three years of teaching experience, are not as rigorous as a licensure exam or 15 college credits.	
Information technology certifications do not require a deep knowledge of computer science – the rule should specify which certifications will be accepted.	
Administrators should be required to fill out a form to verify teachers were performing well during their years of teaching experience.	
There should be a preference for in-person professional development, rather than online workshops that are often not rigorous. Professional development providers should be vetted.	
	PED staff believe the good faith act of drafting a letter to PED is an affirmative endorsement of an educator’s high performance.
	Regardless of the method of delivery, PED staff believe 60 hours of professional development is a significant undertaking and demonstrates a commitment to computer science inquiry and growth.

Semantic Issues	
Summary of Comment	PED Response
It is more appropriate to require 15 hours of postsecondary course credit hours in “computer science,” rather than in “computer science education.”	Changed “education” to “coursework.”
Items (e) and (f) of “computer science knowledge and skills” should be reprioritized to be the first competencies.	Reordered for these two competencies to be listed first, though it should be noted that all competencies are equally important.
Middle school principals should also be allowed to verify years of teaching experience.	Changed “high school” to “secondary school.”
Verify section and paragraph numbering is correct.	Fixed incorrect numbering for sections and paragraphs.