

**From:** [Todd Knouse](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Input on 6.60.6  
**Date:** Saturday, December 3, 2022 7:22:48 PM

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I'm writing with input on the proposed changes to NMAC 6.60.6.

There is mention of "department approved educator evaluation system" throughout these changes. I suggest that this be amended to explicitly include evaluation systems that charter schools have developed locally in accordance with 22-8B-5.

Perhaps a definition of "department approved educator evaluation systems" is appropriate?  
Something like "any system for educator evaluation that is approved by the public education department or by a duly authorized charter school for use within that charter school."

Todd Knouse  
Head of School  
New Mexico International School

**From:** [Mitchell Freedman](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Dossier replacement may be even worse than the dossier. Both must go.  
**Date:** Monday, December 5, 2022 6:34:41 AM

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I think I have a unique perspective on this. I was a practicing lawyer for over 35 years, mostly in CA and two years in NM. I represented mostly businesses and professionals in complex litigation. I also did employment law, real estate law, insurance coverage, insurance defense law (products liability, major vehicular accidents, libel cases, etc.). I am now a certified public school teacher in NM, thanks to the wonderful ATL program I took through CNM, and am currently teaching AP US History, US History, Gov/Politics and Econ (as well as AP in both when enough students want it :). In representing other professionals, though, I learned a lot about how each profession functions.

Yes, I took a 70% pay cut to become a teacher. But I did it because I had long wanted to teach, and I do find meaning in helping open young minds to critical thinking. That is no excuse for the still limited pay for teachers, which I will return to later. Everyone knows teachers are poorly paid professionals, and shouldn't be.

But, too often, politicians and too many citizens don't talk about is the continuing rise in administrative oriented paperwork that first Bush II, and then Obama, and various governors, threw at teachers over decades. The worst of these onerous paperwork obligations I ever saw or read about is the NM teachers' dossier. And worse, your solution is 50-80 hours plus testing with 85% or better on every test. Plus, \$300 total payout to the State or whoever.

Let's compare professions on extra paperwork and additional obligations:

When a doctor, lawyer, accountant, dentist enter the licensed status, they take a test. They pass, they're in. Then, over the years, mostly starting at the end of the 1990s and early 2000s, yearly paperwork was added, too. However, it is ONLY listening or watching videos for what is called "Continuing Education." Now, let's talk lawyers, who I know best:

In CA, a lawyer needs 25 unit hours over three years (though the talk at the State Bar of CA is to go to 12 hours a year, which a lot of states do already). In NM, it is 12 unit hours a year. There is NO TEST where a lawyer has to get an 85% or better to keep his/her/their license. In regard to cost, it is less than what you guys are doing to teachers, who earn on average far less than lawyers. For lawyers, there are national organizations which allow me to meet my continuing education requirements at the same time in both states, and the cost is \$149 total for the videos I watch or lectures I attend.

The same is true with doctors, dentists, and accountants. None have to do anything like a dossier at any time. And none have to keep taking tests to get through from one level to another.

I so admire our State's governor (who I do admit calling the Greatest Governor in the Country) for raising starting teacher salaries to just over \$50K and have even had an opportunity to say to her that it should be \$60K a year to start--which would be a good way to get some pre-law and pre-engineer college students to think about teaching as a first career. That was the first step Finland took in nearly fifty years ago to reform their education system, and they went from the bottom of the European nations to the top. It is not the only step, but it something the PED would do well to look more seriously at. The idea that Finland is a small country is irrelevant because there are less students in NM than in Finland. But, I digress.

The main point is there is no good reason to have a dossier system. It was dumb and punitive when it began and it needs to just...STOP. Teachers should get their Level II just by being teachers for three years. If there is a problem with a teacher's skills or performance, start to look instead at the performances of principals--and what the principal is doing with respect to a teacher to "coach up" that

teacher. I was in law office management and know what it means to manage people and offices. I also did a lot of employment litigation, and led seminars for dealing with problem employees--document, document, document is the first mantra. That can be done in a union environment or a civil service environment. By the way, I am a strong supporter of unions and the teachers' unions in particular. So, let's not blame unions, as too many are wont to do. It is about effective managing of an office or operation.

But, one thing is clear: THE DOSSIERS HAVE TO COMPLETELY GO AWAY. NOW.

I am open to further questions, comments, or even a debate. I was a litigation lawyer, after all. LOL.

Mitchell J. Freedman  
Rio Rancho, NM  
December 5, 2022

**From:** [Noemi Bonilla](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Rule change/licensure  
**Date:** Friday, December 9, 2022 7:16:46 PM

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Hello,

Will level 2 teachers who completed their Masters be able to automatically move to a level 3 licensure with the rule change?

-Jasmine  
3rd grade bilingual educator

**From:** [Karen Rademacher](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Micro-credential  
**Date:** Monday, December 12, 2022 7:21:12 AM

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Since the PED is already enrolling people in the micro-credentialing process, seems like they've already made up their mind. I busted my butt to complete the Dossiers so I would want the micro-credentialing to be just as rigorous.

--

Karen Rademacher, MA Ed., Ed.S  
Assistant Principal  
Ventana Ranch Elementary School  
(505) 890-7375 ext. 42635

**From:** [John Judkins](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Micro-credentialing Proposal  
**Date:** Monday, December 12, 2022 9:33:08 AM

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I like the proposal for the most part. I do wonder what would be the effect of breaking the credentialing down to even smaller parts, using outside workshops and evidence-based assessments that more closely align with the teacher's professional needs. For example, a food science teacher could learn and demonstrate content and skill knowledge through evidence provided by catering events videos and documentation.

I also wonder about the level III teachers. They should also be required to do ongoing PD. As a level III teacher, I do a lot of PD on my own but get no recognition and it is not required. I think PD is essential to professional growth.

Thank you,  
John Judkins  
(505) 400-4547

--

Dr John Judkins, PhD  
Special Education Science Teacher.  
B212

**From:** [Beth Lindsey](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] educator licensure  
**Date:** Monday, December 12, 2022 10:22:56 AM

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Regarding the changes to educator licensure, I only have the ATF's comparison chart and not the proposed changes to the rule. Given what I have reviewed, it raises several questions along with the assumption that licensure changes will result in evaluation changes.

- I see MLSS as a micro-credential, but I wonder how that applies to special education teachers providing tier 3 instruction. Does this account for the differences in special education classrooms from intensive needs to gifted? I am currently providing preK inclusion support. How would MLSS apply to me in my current position? We refer to Childfind.

- What is meant by "assessment literacy"? Is that understanding formative and summative assessments? Or are we talking about high-stakes assessments? Assessment is only one piece of instruction. What you do with the results of the assessment is far more important. Data-driven instruction would be a better title for this.

- Culturally linguistically responsive instruction. This completely ignores using differentiated instruction or using modern instructional practices. Gone are the days of lecturing for 45 minutes in front of a class, and yet that is still going on. Teachers need to be able to demonstrate flexibility in instructional practices and responsiveness during instruction. Teachers need to demonstrate their ability to connect with students where the students are and to engage them in instruction rather than just lecture at them. This goes to the core question of what education is - do we teach students how to learn or how to memorize?

- Many licensed teachers are not working in classrooms but at school or district levels. How does this licensing/evaluation impact us?

- Social-emotional learning and restorative practices are completely missing from this process. Emotional intelligence is a critical skill for teachers and administrators. It impacts both instructional effectiveness and family engagement.

- What is the fee structure for advancing through National Board certification instead of completing micro-credentials?

- How are annual evaluations going to align with this credentialing system? How will an administrator observe and evaluate these areas if the teacher has not completed them yet? Will there be different evaluation standards based on what micro-credentials have been completed, or whether a person has a masters degree, or national board certification?

- Who has been involved in informing these changes? I have been actively calling for changes to the teacher licensure/evaluation standards for many years,

particularly when it comes to special education teachers for students with significant needs. Our voice is frequently overlooked.

- What ongoing PD will be required after achieving a licensure level? There has to be something to keep teachers current with best practices. (My previous license in Massachusetts required 150 hours of PD in specific categories in order to renew every 5 years.)

- Where does superintendent approval fit in with the micro-credentialing process?

The rest of my questions are more particular to teaching standards and evaluation, when that is updated. Evaluations need to be teacher-centered and teacher-driven with administrators validating the evidence that teachers provide, much like the ways domains 1 and 4 are currently handled. Let's foster growth, competency and trust in professional educators.

Elizabeth Lindsey

20 year educator/administrator

#322212, 3-A Special Education (2029), 3-B Admin (2025), NBCT ECYA-ENS (2030)

**From:** [Arturo Candelaria](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Level III License  
**Date:** Monday, December 12, 2022 12:15:04 PM

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What if you already have a level III license. Do you have to participate in this process?

Arturo Candelaria, HSMT, EDS, MED, BS  
"Goals Without a Plan are Just Dreams"

**From:** [Cristina Rincon](#)  
**To:** [FeedBack, Rule, PED](#)  
**Cc:** [Cristina Rincon](#); [Bernstein, Ellen](#)  
**Subject:** [EXTERNAL] Resp. from Fed Rep at Adobe Acres Elem. ABQ  
**Date:** Wednesday, December 14, 2022 6:23:19 AM

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My main response is: Does this align with what we need to recruit teachers to New Mexico schools?

Any time you put more demands on teachers, you are working against the goal of recruiting and retaining teachers.

Requirements went from 3 to 5.

You went from a more personalized system to an on-line system. COVID demonstrated that online learning rarely surpasses in person learning.

Where will this leave teachers who already have a masters and/or national board certification?

We are in a time where we should be lessening the load of teachers. Teacher retention is an on-going problem.

How can we make our profession more attractive? How can retain teacher in NM (National Board teachers get recruited out-of-state quite often)

...that is the question NM PED should be considering every time it attempts to revamp any current program.

Sincerely,

Cristina Rincon

**From:** [Kenneth Brooks](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Micro-credentials (APLI-II)  
**Date:** Wednesday, December 14, 2022 6:36:30 AM

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I am sending this email in order to record *my support* for the switch to the Micro-credential system.

Again, I am in favor of the Micro-credentials.

Thank you.

--

Ken Brooks

Teacher

Room #MA-106

West Mesa High School

December 16, 2022

To whom it may concern,

Thank you for the opportunity to respond and comment to the proposed rule changes to 6.31.2.10 NMAC. The following are concerns regarding the proposed changes.

I would like to acknowledge that providing clarification on guidance regarding timelines for the process of identification, evaluation and services is very helpful. However, the currently proposed timelines will create significant challenges for school districts, particularly during a time when staff shortages are high. Additionally, the current timelines will limit the ability of staff to conduct quality and thorough evaluations, limit the ability to apply thorough analysis to the referral questions, and the one exception does not address the reality of staffing issues in NM schools.

I outline these concerns in more detail below and also provide some alternate suggestions I hope the Department will take into consideration.

#### **6.31.2.10 (E) Evaluation requests and referrals**

(1) Either a parent of a child or a public agency may initiate a request for a full and individual evaluation to determine if the child is a child with a disability or may request a reevaluation to determine if the child's educational needs have changed.

(2) The request for initial evaluation or reevaluation by a parent may be made in writing or orally. A parental request for a full and individual evaluation made to any employee of the school in which the student attends shall be forwarded or communicated to the school or district special education director or a school or district administrator as soon as possible after it is received.

(3) The public agency shall respond to a parental request for initial evaluation or reevaluation to the public agency no later than 15 school days from the receipt of the request. If a parent request for an evaluation or reevaluation is received within 15 school days before the start of a scheduled period in which student attendance is not required for at least 14 calendar days, the public agency shall respond no later than 30 calendar days from the date of the request.

(4) The public agency shall respond to a parental request for initial evaluation or reevaluation by:

(a) providing prior written notice consistent with 34 CFR Sec. 300.503 that proposes to conduct the requested evaluation or reevaluation, providing a copy of the procedural safeguards notice to parents required by 34 CFR Sec. 300.504, and seeking parental consent for the evaluation; or  
(b) providing prior written notice consistent with 34 CFR Sec. 300.503 of the public agency’s refusal to conduct the evaluation or reevaluation and a copy of the procedural safeguards notice required by 34 CFR Sec. 300.504.

**(1) Each public agency shall maintain a record of the receipt, processing, and disposition of any request**

#### Concerns/Suggestions

- “any employee of the school”, implies that the request can be made to custodial staff, cafeteria staff, aides, teachers, administrator, etc.
  - “receipt of the request” is not clear. Is this receipt from the parent to any school staff member, or is this receipt of the request by a staff member to an administrator?
  - *In order to establish, track, and document a proper timeline (15 school days), and ensure the parent request is responded to appropriately, it is less ambiguous for all parties if the request for evaluation by a parent (either orally or in writing) is to be made to an administrator.*
- 1. 6.31.2.10 (E)( 3) and (5) Evaluation requests and referrals**
- (re: Exception to the 15 school days and 14-calendar day break)
    - The exception to the timeline accounts for a two week break. Which would include both the winter break and summer. According to the proposed rule, a school would have 30 days to respond from the request following a 14 day break. In this scenario, if a request either by the parent, or a SAT is made the last two weeks of school, it would require the district to respond with PWN in June. I understand there are situations where conducting summer evaluations are necessary, but it is not the norm. The majority of districts are not required to maintain staff during summer months. It is challenging to find staff during the school year, but it can be almost impossible during June and July, especially in rural NM, even when you look to contracting agencies.
    - *In order to ensure requests made before a break in instructional time longer than 14 days do not get lost within the system, implement the timeline upon return from any 14 day break. i.e., respond within 15 school days following the end of the break. This still sets the clock in motion, but when schools are required to be in session.*

#### 6.31.2.10 (F) Timeline for evaluations

(1) “All appropriate evaluation data, including complete Student Assistance Team file documentation, multi layered systems of supports data,…”

##### Concerns/Suggestions

- Current guidance from the Public Education Department’s Curriculum and Instruction Division regarding MLSS, is that documentation of interventions is not required. I agree with this proposal to include this information as this data is vital in appropriate determination of eligibility, particularly with Specific Learning Disabilities, and no more so than with Dual Discrepancy.
- In order to ensure appropriate documentation, it will require documentation to occur as part of the MLSS process and the guidance from C and I to match the NMAC proposals.

(2) “ The initial evaluation and written evaluation report shall be completed within 60 calendar days of receiving parental consent for evaluation.”

##### Concerns/Suggestions

- This proposal is truly the most concerning of the recommendations.
- Determining the identification of a disability for a child is not a matter that should be taken lightly. It is a serious responsibility. Having the entire 60 days to do the evaluation is imperative for multiple reasons outlined below.
- The completion of the written report, inclusive of the 60 day timeline, (particularly in very involved evaluation cases such as AU, ED, MD, OHI or combination), will decrease an already challenging timeframe for conducting a full and individual evaluation that meets the standards and requirement for conducting a compliant and most importantly, comprehensive and quality evaluation.
- The entire 60 day timeframe (calendar days) is critical for conducting a comprehensive and thorough evaluation. In involved evaluations such as AU, OHI, ED or when looking at Multiple Disabilities, or any combination, the initial evaluation shall include all of the highly recommended components of each eligibility category as outlined in the NM TEAM. A good evaluation requires a thorough analysis of the information and this takes time.
  1. Requiring the written report during this time frame greatly reduces completing all of the highly recommended components.

2. Additionally, the written report on evaluation of this magnitude could be quite extensive, requires thorough analysis and consultation *by the entire evaluation team*, differential diagnosis, and may take several days to write.
- There is no flexibility in the 60 day (calendar days) timeline for non-instructional times (breaks, weekends). This already puts a strain on the system to complete an evaluation currently and this does not include the completion of the report.
    1. Example: If consent is obtained prior to Thanksgiving. Using this year as an example, November 17th, the 60 day timeline falls on January 15th. There are approximately **26 school days** during this 60 day time frame for schools in session 5 days per week. For a small rural school in session 4 days a week, **there are only 20 school days** with most providers available one day per week and this does not include any student absences.
  - **Another solution: Require the EDT be held within 30 days of the completion of the evaluation.**
    1. this allows for:
      - a. the full 60 day timeline to be devoted exclusively to conducting a comprehensive evaluation,
      - b. time to complete a thorough analysis of the evaluation data for the written report,
      - c. the completed EDT report to be provided to the IEP team in advance of the meeting, and;
      - d. for the report to be provided to the parents within 2 calendar days of the meeting.

**6.31.2.10 G. Procedures for conducting evaluations and reevaluations.**

(4) The public agency shall provide the parents with a written report of the evaluation or reevaluation at least two calendar days before the eligibility determination team meeting.

- Concerns/Suggestions-See above. This is reasonable with a 30 day timeline for the EDT to be held.

**6.31.2.10 J. Eligibility determinations**

(1) “If an individual evaluation is completed during a scheduled period in which student attendance is not required for at least 14 calendar days, **the public agency shall convene both a meeting of the eligibility determination team and (if the child is determined eligible) a meeting of the IEP team** to develop or revise the child’s IEP no later than 15 school days from the first day when the student attendance resumes.”

Concerns/Suggestions

- Why does this include the IEP meeting? The federal requirement states the IEP be held no later than 30 days after the EDT decision has been made.
  - *"300.323 (C) (1) A meeting to develop an IEP for a child is conducted within 30 days of a determination that the child needs special education and related services ;and.*
  - In most cases, the IEP is held in conjunction with the EDT. However, there are instances in which it may not be feasible to hold them on the same day, including a parent schedule that does not allow for time to attend both meetings or parent fatigue.
  - Parent fatigue may limit meaningful participation. Sitting through an eligibility determination meeting and hearing about their child's disability for the first time may be emotional and draining for a parent, even when they are the entity seeking the evaluation. It may not be appropriate to hold an IEP meeting following the EDT or on the same day when a parent has not had the opportunity to process the information.
- (2) Optional use of developmentally delayed classification for children aged three through nine.
- (a) The developmentally delayed classification may be used at the option of individual local educational agencies but may only be used for children *who do not qualify* for special education under any other disability category.

Concerns/Suggestions

- The term “who does not qualify” is inconsistent with the NM TEAM and NMAC. The term *who is not eligible* is more appropriate.

**6.31.2 K. Criteria for identifying children with suspected specific learning disabilities.**

Concerns/Suggestions

- Should this section not reflect the same language from 6.31.2.10 (E)(3) or include a reference to (E)(3), i.e., 15 day timeline?
  - (d) “A parent may request a full and individual evaluation for eligibility for special education at any time during the public agency’s implementation of the multi-layered system of supports. If the public agency agrees with the parent that the child may be a child who is eligible for special education services, the public agency shall evaluate the child. If the public agency declines the parent’s request for an evaluation, the public agency shall issue prior written notice in accordance with 34 CFR Sec. 300.503 and Subsection E of this section. The parent may challenge the

decision to decline a request for evaluation by requesting mediation or a due process hearing or by submitting a state complaint. “

(3) Public agencies shall use the dual discrepancy model to identify children with specific learning disabilities in kindergarten through grade 12 as described in the **New Mexico technical evaluation and assessment manual.**

Concerns/Suggestions

- Should be capitalized as in (G)(1) New Mexico Technical Evaluation and Assessment Manual (New Mexico T.E.A.M.)

Thank you for your consideration of these matters. I welcome the opportunity for any questions you may have. I would be pleased to discuss these concerns further.

Sincerely,

*Dahn Freed*

Deputy Director, Region 9 Education Cooperative  
Director, Educational Services (Ancillary, Consultants, Professional Development)Region 9  
Licensed Educational Diagnostician  
Consultant and Project Coordinator to the Special Education Division for New Mexico Technical Evaluation Manual and Developing Quality IEPs

**From:** [Jordan](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Dossier  
**Date:** Friday, December 16, 2022 7:07:23 AM

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With the new changes to the dossier system, what happens to teachers like me who are right in the middle of writing it for level 3. Am I going to be able to submit my document since it has taken me so long to do?

Thank you

**From:** [Brian Kruis](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Licensure changes  
**Date:** Monday, December 19, 2022 12:39:12 PM

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This looks like a great change - if Level 2 can move up to level 3 with a masters degree, this is an awesome improvement because we are not piling "hoops" to jump through for teachers who have just done tons of work for their masters. My wife is level 2 and just completed her masters, how soon can this take affect and can she just apply for level 3 as soon as the new policy is in place?

Thanks,

Brian Kruis

--

Brian Kruis

[brian.kruis@aps.edu](mailto:brian.kruis@aps.edu)

La Cueva High School

505-823-2327 ext 33118

"An investment in knowledge pays the best interest". Ben Franklin

**From:** [Brian Kruis](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Changes  
**Date:** Tuesday, December 20, 2022 5:38:04 AM

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Am I interpreting this correctly?

Successfully completing APLII-III, a master's degree or receiving certification from the national board for professional teaching standards.

If a teacher is at level 2 and completes their masters, they will move right up to level 3? That would be smart since we are in a teacher shortage and when a teacher completes their masters - their hard work should be recognized without them having to jump through additional hoops.

Thanks for making this process smarter and better for kids so that we can retain better teachers in NM!!!!!!

Merry Christmas!

Brian Kruis

--

Brian Kruis

[brian.kruis@aps.edu](mailto:brian.kruis@aps.edu)

La Cueva High School

505-823-2327 ext 33118

"An investment in knowledge pays the best interest". Ben Franklin

**From:** [Julie Radoslovich](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Is this available by zoom?  
**Date:** Monday, January 2, 2023 9:15:37 PM

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I am interested in attending this meeting, but is it available virtually? I don't see a link. Thank you.

Julie Radoslovich  
505-352-4440

**From:** [Aja Currey](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Micro-Credential Rule Hearing  
**Date:** Monday, January 2, 2023 9:32:06 PM  
**Attachments:** [MC Rule Hearing Jan.3 2023.docx](#)

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Please find attached a letter regarding tomorrows rule hearing on the micro-credentials.

Thank you!

Aja Currey  
Rio Gallinas Charter School Principal

Sent from [Outlook](#)

Good afternoon,

My name is Aja Currey and I am the Principal at Rio Gallinas Charter School in Las Vegas, NM. I have been in education about 15 years now and have served as a classroom teacher, a special education teacher for most of my career, a special education coordinator, and a Dean of Students before taking the principalship this year. I have served as a NM Teach Plus Policy Fellow and Senior Policy Fellow as well as a National Senior Research Fellow for three years. Through my time as an educator, administrator, and an advocate for high quality education in New Mexico, I have gained a firm understanding in professional development and what works to increase the capacity of our teachers in order to most effectively serve our students.

Since most of my time has been spent as a special educator, one of the biggest takeaways and biggest things to remember in daily practice, is that every student is different and learns differently. There are multiple pathways to learning and as adults we do things in different ways, as well. Trying to teach a one-size fits all approach will simply fail your students and fail your teaching practice, as well. Strengths vary from student to student and the same goes for teachers. Using a one-size fits all approach in evaluating teachers as they move between levels does not make sense and ends up failing some who simply had difficulty with the process. Just as with our students, there should be true opportunities for assessing skills rather than whether or not the individual is able to jump through enough hoops to complete the process.

I completed and passed my dossier some years ago to move from Level I to Level II, before receiving my 3B Admin license. Through these years, I have also watched and supported several other educators as they moved through the dossier process between Levels I to II and also between Level II to Level III. I also know others that just feel like they can't muster up the strength and time to work through the dossier process on top of teaching full time and living life and stay put at Level I. Some of these folks are excellent teachers who may eventually leave the profession, if not given a different opportunity.

With my time with Teach Plus, I have been able to advocate for various systems and initiatives related to teacher quality, training, and professional development. As an educator and a principal, I am a strong advocate for using the micro-credential system as a replacement to the dossier process in licensure advancement. The micro-credential provides opportunities for teachers to not only prove that they are ready to move between levels, but also to learn, practice, and implement necessary skills into their classrooms. The dossier doesn't teach anything, it just asks for teachers to prove something they are doing, through reflection and work samples. Too much of the dossier is open for teachers to create submissions that are not actually reflective and meaningful for the teacher, just so they can jump through the necessary hoop. The micro-credential is a process that can be refined and improved on a continuous basis, offers real time feedback to teachers through active facilitators/coaches, and gives opportunity to prove readiness for advancement through actual real-time assignments that provide impact to a teacher's classroom and their quality of instruction.

My recommendations to be considered in this rule change hearing are to:

1. Involve teachers and administrators in designing the micro-credentials to ensure the courses are relevant and meaningful.
2. Ensure facilitators and teachers in the courses have a system in place to provide real-time coaching as they grade assignments in the micro-credential.
3. Move forward with replacing the Level 1 to Level 2 dossier with the micro-credential option.
4. Begin the process of looking at micro-credentials as a replacement to the Level 3 dossier in statute, as this should be a fluid system of advancement for both levels.

The replacement of micro-credentials to the dossier will improve the quality of instruction in our educators. Educators do not come out of college and university programs fully prepared and do not always get everything they need once they're in the classroom. With such a range of individuals going into teaching including alternative licensed teachers, the micro-credential courses have the capacity to provide leveled and targeted instruction that teachers must participate in while advancing what they can provide for New Mexico students.

Thank you!

Aja Currey

**From:** [Julie Radoslovich](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Re: Is this available by zoom?  
**Date:** Monday, January 2, 2023 9:47:58 PM

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It appears this meeting is scheduled in Santa Fe on 1/3 at 1:00. I would like to attend virtually.

On Mon, Jan 2, 2023 at 9:15 PM Julie Radoslovich <[julieradoslovich@gmail.com](mailto:julieradoslovich@gmail.com)> wrote:

I am interested in attending this meeting, but is it available virtually? I don't see a link.  
Thank you.

Julie Radoslovich  
505-352-4440

**From:** [Alisa Cooper de Uribe](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] In Favor of Micro-credential Rule Change  
**Date:** Tuesday, January 3, 2023 7:33:58 AM

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Hello! My name is Alisa Cooper de Uribe, a 1st grade dual-language teacher at NM International School, the 2021 NM Teacher of the Year, and a current Teach Plus Senior Policy Fellow. Thank you for the opportunity for New Mexicans to share their variety of perspectives in this public forum.

I voice support for the rule change to incorporate micro-credentialing into the licensure system to advance to a Level II teaching license. I began my teaching career in New Mexico through an Alternative Licensure program, and while my studies prepared me well to enter the profession as a bilingual educator, there is only so much that a program like mine, or an even lengthier one, can do to equip a teacher with all they need to evolve in ongoing excellence. For the first few years of my career, I learned more about teaching from my colleagues, at conferences, and even from my own mom who Googled classroom management strategies for me on the evenings when self-doubt about my abilities crept into the forefront. They were years of trial, error, fun, and learning alongside my students, and I especially appreciated the feedback and ideas I received from my school leadership and experienced staff.

When it was time for me to prepare my first dossier, I put much of what I'd learned in the field to use, and while I felt that I prepared an adequate picture of my practice for leveling up in licensure, I was left wondering if there were still gaps in my pedagogy, and what it was exactly about my dossier that led to its approval. Two key things were missing from the process: tailored and in-depth professional development to build on my university studies, and feedback outside my school environment on the results of my initial years of teaching.

This is why I find the micro-credentialing system to be a promisingly effective pathway for teachers to advance to Level II licensure, and encourage the rule change to prioritize what we call at my school Voice, Choice, and Ownership of the process. I support a system in which teachers themselves are a part of the ongoing

development of courses, as they have first-hand knowledge of what is needed and relevant. I also believe it is key for educators to have the ability to choose the credentials that best meet their needs as growing educators from a system that is easy to navigate. And related to my own desire to have received more feedback throughout my time preparing for Level II licensure, I reiterate the importance of coaching, support, and feedback during the micro-credentialing process. Lastly, since this new system would require thoughtful and intentional scheduling in order to complete, I recommend that it be aligned with annual Professional Development Plans for teachers who hold an Level I license.

Thank you again for your time and consideration. I appreciate these efforts to best prepare our teachers in New Mexico

**From:** [Tennise Lucas](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] 6.60.6 NMAC, Continuing Licensure for Licensed Educator in New Mexico  
**Date:** Tuesday, January 3, 2023 8:14:38 AM  
**Attachments:** [MC Rule Hearing Jan.3 2023 \(1\).pdf](#)

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Hello. Please see my attached public comment.

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*Tennise Lucas, M.Ed*  
Teach Plus Fellow Alumni  
Choose Love Ambassador



Good afternoon,

My name is Aimee Parra and I am the Network Coordinator for Teach Plus New Mexico. As an educator with 13 years of classroom experience, I know first hand the dedication and immense effort it requires to provide a safe, positive, effective and relevant classroom in order to reach the individual learning needs of 20 plus students at a time. In my teaching career I have completed two dossiers, earning a level two license then later advancing to level 3. Always striving to be the best educator I could be for my students, I believed passion, data, and feedback are what pushed my professional growth. In all honesty I did not receive any feedback on my dossiers other than I had met expectations. In the case of my level 3 dossier, I submitted it one afternoon and learned I was successful the next day.

In fact, half of the teachers and dossier reviewers surveyed by our Policy Fellows reported that the dossier process very ineffective and did not necessarily identify or give feedback on effective classroom teaching.

One of our fellows wrote after learning that her first level three dossier submission was unsuccessful, "If the New Mexico dossier system were to improve and if teachers were to receive meaningful feedback throughout the process, I believe that more educators would remain in the classroom, teaching and inspiring students."

For the past several years Teach Plus has studied and advocated for improved systems related to ongoing teacher training. Teachers, like students, need access to differentiated support. We believe Micro-credentialing is a system that can provide that.

Our four recommendations to be considered in this rule change hearing are to:

1. Provide educators with a consistently formatted micro-credentialing system that allows teachers to choose the topics they need support in order to meet their professional goals and abilities.
2. Involve teacher expertise in designing these courses and activities to ensure the courses are relevant and meaningful. Our network was able to create one of these courses this summer with the goal that an educator completing the course should demonstrate instructional effectiveness and growth in their practice.
3. Ensure coaching plays a central role throughout the courses so teachers receive the support they need to successfully grow as a professional,
4. Establish a system that allows easy access to the courses. These courses have been filling up quickly, leaving out many of our educators who are ready to advance and demonstrate their instructional effectiveness.

It has been an honor and privilege to work on the development of the Micro-credentialing courses and to see how these courses have evolved to provide a more equitable and effective way of developing our classroom teachers as instructional leaders. We feel our teachers, and moreover our students' learning, would greatly benefit from the full implementation of micro-credentialing as a pathway to advance in teacher licensure, showing a teacher's professional growth and effectiveness in their classroom.

Thank you!

Final Testimony-1/3/2023

*I'm a Teach Plus  
and  
fellow*

Hello, I'm Chris Kenner, and I'm a 3rd-grade teacher in Albuquerque. This is my 8<sup>th</sup> year teaching and after having gone through the dossier system to advance from level I to II and then to a level III, I'm well aware of the dossier system and you will soon find that I have a unique perspective of the micro-credential program.

I went through the dossier process during a time when feedback for teachers was not there. My first attempt to move from a level II to a III failed. There was a glitch in the system that prevented me from seeing my feedback. That failure led me to write an op-ed about my experiences with the dossier system and try again. I ended up passing my 2<sup>nd</sup> attempt with the help of a dossier coach.

During this time I was also a part of the 6<sup>th</sup> cohort for Teach PLUS. My team and I were assigned to the project Micro-Credentials. Together we met with Leaders in PED, dossier readers and teachers gather information that would make micro-credentials successful for our New Mexico educators. We've found that two thirds of our teacher respondents indicated they did not believe the dossier process was an appropriate strategy to accurately evaluate the effectiveness of their teaching. .

That project in Teach plus led me to another opportunity, to help write the first Micro-Credential Course: Classroom Environment. My team and I researched best practices for level I teachers to implement in order to move to level II.

Today, I'm now a facilitator for the first cohort of micro-credentials. This micro-credential allows teachers to implement effective strategies for student engagement in real time, with real time feedback. Some of the best reflective responses I've read from the teachers so far all include the line of "My students loved it! I can't wait to implement more of this" when talking about brain breaks and response cues. I've been able to read how these level I teachers are

trying new strategies with their students and they are seeing how effective they are and how much more motivated their students are.

\*In order for my students to learn and grow from their mistakes, they need constant feedback from their teacher; when they make mistakes, and most importantly, when they grow They need to know what to do in order to improve and reach their goals. As a facilitator, I'm able to do this for the teachers as well.

Micro-Credentials allow for teachers to be reflective and implement new strategies

Micro-credentials allow for flexibility in a plethora of areas, not only can they be completed on teachers own time, but it allows for a wide range of educators to advance in licensure. I have elementary, middle school teachers, cosmetology and automotive educators, and librarians. All of these educators are gaining new strategies for student engagement which will lead to more active learning.

My experiences with the dossier system has led me to this: Micro-credentials. I'm able to provide meaningful feedback to my teachers. I love my job because I'm allowed to be creative and I have opportunities for growth. Those are the things I love about teaching that I want other teachers to love too.

Moving forward we need to ensure that micro-credentials are available for all teachers have access to the courses and involve our best Level III teachers in the development and coaching of the courses.

Good afternoon,

My name is Darlene Fortier and I am a second-grade teacher in the Santa Fe Public School district. I am also a Teach Plus New Mexico Alumni and a former Teach Plus National Researcher. It is my pleasure to address you today.

As a level III educator who has done not one, but two dossiers, I urge you to move to the use of micro-credentials to allow teachers a more meaningful way to move within the levels of the 3-Tiered Licensure System. Leveling up with confidence using micro-credentialing gives feedback to success, something the dossier does not. With a pass/fail system and no feedback, it leaves one wondering what wasn't successful and how to improve upon it when there is a no-pass situation. A shot in the dark so to speak.

Another concern with the dossier process is the opportunity for one to copy and paste from outside sources giving voice to plagiarism. The first time I heard a teacher say this, I was mortified. The process should be authentic and tied to the classroom practices of the educator and not the ability to copy/paste/alter educational best practices.

I am a co-creator of, and currently, a facilitator for the Classroom Environment micro-credential course offered to educators moving from level I to level II during the inaugural rollout of the micro-credentialing option.

This experience has not only been rewarding for me but empowering to educators as they are provided feedback on best practices reflecting on their own experiences. It also negates the opportunity to plagiarize as the activities within the courses are driven by authentic experiences within the teachers' classrooms. Knowing grade levels, and teacher locale helps the facilitator, such as myself, assess the micro-credentialing course on a case-by-case basis. It is no longer a one-size-fits-all but a tailored look at a specific classroom and the teacher.

I support moving from the dossier process to the micro-credentialing opportunity for these reasons:

1. A more authentic look at the practices of our educators
2. Feedback relevant to the process
3. It is a transparent experience

Thank you for your time today.

Good afternoon,

My name is Aimee Parra and I am the Network Coordinator for Teach Plus New Mexico. Before taking on this position, I was a kindergarten teacher. My kindergarten class was like a small town community. Each day, Shyla, our 5-year-old mayor, shared our learning goals and reviewed the academic skills we previously covered. Olive, our meteorologist, shared the daily weather report and Aziah, our record keeper, reminded me, during the pandemic, to record our Zoom sessions for those absent that day.

Every day, this learning community helped my kindergartners to achieve academically and succeed in life. Teachers as learners are not so different from students. We strive to become the best educators we can be for students like Shayla, Olive, and Aziah. And just like our students, we need timely and useful feedback that is based on data. This means that we need an effective dossier process. In my teaching career I have completed two dossiers, earning a level two license, then later advancing to level 3. I did not receive any feedback on my dossiers other than I had met expectations. In the case of my level 3 dossier, I submitted it one afternoon and learned I was successful the next day. How much more effective could I have been in the classroom if I had gotten feedback?

In fact, half of the teachers and dossier reviewers surveyed by Teach Plus Policy Fellows reported that they found dossier process very ineffective. They neither received nor gave feedback on effective classroom teaching.

For the past several years Teach Plus has advocated for improved systems related to ongoing teacher training. Teachers, like students, need access to differentiated support. We believe micro-credentialing is a system that can provide that.

Our four recommendations to be considered in this rule change hearing are to:

1. Provide educators with a micro-credentialing system that allows teachers to choose the topics they need support in order to meet their professional goals and abilities.
2. Involve teachers in designing the system to ensure the courses are relevant and meaningful.
3. Ensure coaching plays a central role throughout the courses so teachers receive the support they need to successfully grow as a professional,
4. Establish a system that allows easy access to the courses, to give access to all our educators who are ready to advance and demonstrate their instructional effectiveness.

We know that our teachers, and our students' learning, would greatly benefit from the full implementation of micro-credentialing as a pathway to advance in teacher licensure, showing a teacher's professional growth and effectiveness in their classroom.

Thank you!

**From:** [Chrissie Souders](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] Written Comment 6.69.4 NMAC, Performance Evaluation System Requirements for Teachers.  
**Date:** Tuesday, January 3, 2023 12:44:27 PM  
**Attachments:** [January 3 Letter.docx](#)

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Good afternoon.

Please see the attached document for my public comment. Thank you

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**Chrissie Souders**  
**5th Grade ELA Teacher**  
**GW Stout Elementary**  
**2022-2023 NM Teach Plus Senior Fellow**

January 3, 2023

To Whom It May Concern:

My name is Chrissie Souders. I am a 5<sup>th</sup> grade ELA teacher in Silver City, NM with 24 years of teaching at GW Stout Elementary. I am currently 2022-2023 NM Senior Policy Fellow with Teach Plus. I am writing today in my support of the repeal and replace of **6.69.4 NMAC, Performance Evaluation System Requirements for Teachers**. The replacement of using micro-credentialing rather than the dossier will help the state keep teachers instead of losing teachers to other careers because the requirements to move from Level 1 to Level 2 through the dossier system is challenging. Especially right now when education is in crisis with teachers leaving the field and New Mexico having a high vacancy rate for teachers. I have personally seen teachers in my building that have gone through the dossier process struggle to pass and they are excellent teachers. My colleagues having to resubmit sections without feedback not knowing how to improve so they can pass. The frustration at the system, which has led to some teachers reevaluating staying in education. The micro-credentialing system can improve the pathway for teachers to move levels and in the process make teachers more effective educators in the classroom.

I can personally say the dossier process is very frustrating and challenging. As I am currently working on moving from my Level 2 to Level 3. I have had access to classes to help me write my dossier which is helpful, but I feel there has to be a better way to show that I am highly qualified educator. Writing pages and pages of my teaching to be evaluated by a reader to see if I am highly qualified is stressful. I can honestly say that I could have done my dossier years ago, but I just couldn't put myself through the stress of this process, but now as I am getting up in years in my career I see I need to have my Level 3 license.

NMPED is taking the right steps in replacing the dossier with the micro-credentialing system to provide teachers with successful opportunities to move from Level 1 to Level 2 that will provide a system to keep and retain high quality educators for our students in New Mexico. I fully support NMPED making this change. Thank you for your time and consideration on this very important change.

Chrissie Souders  
GW Stout Elementary 5<sup>th</sup> Grade ELA Teacher/Lead Teacher  
2022-2023 NM Senior Teach Plus Fellow  
[csouders@silverschools.org](mailto:csouders@silverschools.org)  
575-590-7621

**From:** [Brian Laurent](#)  
**To:** [FeedBack, Rule, PED](#)  
**Subject:** [EXTERNAL] feedback on proposed rules  
**Date:** Tuesday, January 3, 2023 4:11:53 PM

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To the New Mexico Public Education Department:

My name is Brian Laurent, Jr. I am halfway through my fourth year as a special education teacher at James Monroe Middle School in Albuquerque. I teach 7th grade math in a cross-categorical setting. The majority of my students have specific learning disabilities with a median current math ability of 3rd grade. I also serve on the Governing Council of Mountain Mahogany Community School. Before transitioning to the classroom, I served as the Director of Accountability for the New Mexico Public Education Department (NMPED). I am writing to provide feedback on the proposed repeal and replacement of 6.60.6 NMAC and 6.69.4 NMAC, specifically the portions that address the recently implemented Advancement Program for Level I – Level II (APLI-II). This feedback represents my personal views alone.

The Professional Development Dossier (PDD) is flawed and requires hours of tedious, unpaid work outside of the contract day. The PDD does not fully represent my day-to-day work as a special education teacher. Most importantly, the PDD does not increase student learning or strengthen my relationships with my students and their families. The PDD is the proverbial box to be checked. As someone who is intrinsically motivated, the promise of an increased salary resulting from the completion of a successful PDD has not been enough to overcome the lack of value I see in the current advancement system.

This fall, I was pleased to learn about the much-needed changes to the system of licensure advancement. I would be able to use APLI-II to grow as an educator while advancing my license. The challenge, however, is that NMPED has created a replacement system that maintains the flaws of its predecessor while introducing new weaknesses. It is unconscionable and unrealistic to expect educators to spend “approximately 10-16 hours” of unpaid time outside of the contract day on each of the five micro-credentials. I already work 15-20 uncompensated hours each week because I view this additional time as necessary to meet the high expectations of being an educator of students with significant skill gaps. I do not understand why I must give even more of myself in order to advance as an educator.

The APLI-II is incredibly condescending, as it assumes that Level 1 educators have not previously implemented and reflected upon the tasks required in the “Classroom Environment” micro-credential. Topics in this micro-credential include physical arrangement of the classroom, access to materials, flexible seating, engagement strategies, response methods, and the development of a classroom management plan. I learned about and demonstrated competency on each of these topics during my introductory coursework at Central New Mexico Community College’s excellent alternative licensure program before my first day with students in the classroom. It is insulting to expect me to complete these tasks again after three and a half years of successfully serving at-risk students. I do not need “learning opportunities that support what ‘Applying’ and ‘Innovating’ teachers do on a regular basis” because all of my evaluations reflect scores of “Applying” or “Innovating” across all domains. My students, their families, my colleagues, and even an APS board member have commended my abilities as a special education teacher. My current professional development requirements exceed what is currently available through the PDD and APLI-II.

It is unclear why NMPED has decided to micromanage the state’s educators and assume that the needs of all Level 1 teachers are identical. The PDD and APLI-II certainly do not fit my individual needs. I am fully capable of identifying professional development opportunities that will allow me to grow as an educator. For example, I have completed two of the four courses and earned a passing score on the related Praxis assessment required for the gifted endorsement. I am pursuing this endorsement to better serve the twice-exceptional students in my classroom. Additionally, unlike the APLI-II, the endorsement is a true credential that NMPED clearly values, as demonstrated by the department’s endorsement requirements. I would be unable to serve as the teacher of record in a gifted setting without it. NMPED

should, therefore, allow alternate, rigorous options such as the gifted endorsement for licensure advancement.

The "Classroom Environment" micro-credential is due January 15, 2023. I have not started the module, and I do not plan to begin the work. My current decision is whether to summon the motivation to complete the PDD before my Level 1 license expires on June 30, 2024, or prematurely exit the classroom at the end of this school year or next school year. If I choose to pursue other career options, this letter will serve as evidence, albeit from just one educator, of some of the reasons behind the unsuccessful efforts to retain high-quality educators in New Mexico and the consistently low academic outcomes in our state.

Sincerely,  
Brian Laurent, Jr.

**From:** [Ellen Bernstein](#)  
**To:** [FeedBack, Rule, PED](#)  
**Cc:** [Whitney Holland](#)  
**Subject:** [EXTERNAL] Comments from ATF to PED about rule 6.60.6  
**Date:** Tuesday, January 3, 2023 4:48:00 PM  
**Attachments:** [Comments from ATF to PED about rule 6.60.6 .pdf](#)

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To: Dr. Kurt Steinhaus, Secretary of Education for the state of New Mexico

From: Dr. Ellen Bernstein, President, Albuquerque Teachers Federation

Re: Comments on behalf of the over 5,000 licensed teachers in the Albuquerque Public Schools to the New Mexico Public Education Department concerning the proposal to repeal and replace rule 6.60.6 which establishes the requirements for individuals holding New Mexico licensure who are seeking continuing licensure.

Ellen Bernstein, Ed.D.  
President, Albuquerque Teachers Federation  
Tel: 505.262.2657 Ext. 202  
website: [www.atfunion.org](http://www.atfunion.org)



530 Jefferson Street NE  
 Albuquerque, New Mexico 87108  
 505.262.2657, fax 505.266.1967

**ELLEN BERNSTEIN**  
 PRESIDENT

January 3, 2023

To: Dr. Kurt Steinhaus, Secretary of Education for the state of New Mexico

From: Dr. Ellen Bernstein, President, Albuquerque Teachers Federation

Re: Comments on behalf of the over 5,000 licensed teachers in the Albuquerque Public Schools to the New Mexico Public Education Department concerning the proposal to repeal and replace rule 6.60.6 which establishes the requirements for individuals holding New Mexico licensure who are seeking continuing licensure.

In December of 2022 the Albuquerque Teachers Federation (ATF) conducted a survey of the licensed teachers in the Albuquerque Public Schools (APS) about the proposed rule change.

We explained that although the PED already announced that they are changing licensure advancement from a dossier system to a micro-credentialing system there is a rule making process and we asked for their feedback. This chart (link) described for the teachers the differences between the two systems.

	<b>Dossier</b>	<b>Micro-credentials (APLI-II)</b>
requirements	Licensure advancement is based on a Professional Development Dossier (PDD) that includes evidence of a teachers' practice in nine teacher competencies divided into three strands: <ol style="list-style-type: none"> <li>1. Instruction</li> <li>2. Student learning</li> <li>3. Professional learning</li> </ol>	Licensure advancement is based on the successful completion and demonstrated mastery in five "micro-credentials" areas. <ol style="list-style-type: none"> <li>1. Classroom environment</li> <li>2. Multi-layered systems of support</li> <li>3. Assessment literacy</li> <li>4. Culturally linguistically responsive instruction</li> <li>5. Family engagement</li> </ol>
process	The PDD is a <b>reflective process</b> in which teachers describe why they make the instructional decisions they make and the impact those decisions have on student learning.  The Dossier requires teachers to explain how they know whether students are making progress, and what targeted instruction they need to provide to help their students make progress.	Micro-credentials are a <b>skills-based/competency-based</b> process made up of several on-line courses, each focused on a discrete skill or area aligned with the educator evaluation system.  There is a reflection process embedded in each credential.

	Teachers show professional growth they have made in Strand C, by detailing how they have investigated and implemented change in their practice, as well as how they collaborate with others for student learning.	Can be completed “step by step.” The successful completion of each micro-credential will make an educator eligible to progress to the next micro-credential.
Time requirement	Must be submitted as single, completed compilation.  Submitted in the 3 <sup>rd</sup> to 5 <sup>th</sup> year of teaching, or any time after teaching 3 years on a Level 2 license.  A Dossier is expected to take up to one year to complete.	One micro-credential course takes 6-12 weeks to complete.  Must be completed by the 5 <sup>th</sup> year with a level 1 license.  Year 1 and 2 educators are encouraged to begin process for Level II license “as soon as they are able” because program is designed to take approximately 15 months.
Success criteria	Passing for each strand is based on “exceeds standards/meets standards/does not meet standards” rating system.  Strands either pass or do not pass. Strands can be resubmitted.	Micro-credential courses are considered completed upon demonstrating mastery of 85 percent or higher.
Cost	Initial submission fee is \$320. Fee for resubmission of one or two strand is \$110 per strand. Fee for complete resubmission is \$320.	Fee for each micro-credential is \$60 each, for a total of \$300.
Advancement Criteria from Level 1-2	Successfully passing all three strands of the PDD; and completion of the mentorship requirement for beginning teachers.	Successfully completing APLI-II or receiving certification from the national board for professional teaching standards; and completion of the mentorship requirement for beginning teachers.
Advancement Criteria from Level 2-3	Successfully passing all three strands of the PDD, a master’s degree or a certification from the national board for professional teaching standards	Successfully completing APLII-III, a master’s degree or receiving certification from the national board for professional teaching standards.

**We asked the following questions:**

Have you completed a dossier?

- Yes
- No
- Yes, twice

Do you agree with the changes proposed by the PED.

- Yes – why
- No -why

Do you have concerns about this change?

Do you have questions about this change?

Elementary teachers:

ATF is concerned that the micro-credentialing work on top of the LETRS requirement is a heavy lift for beginning teachers.

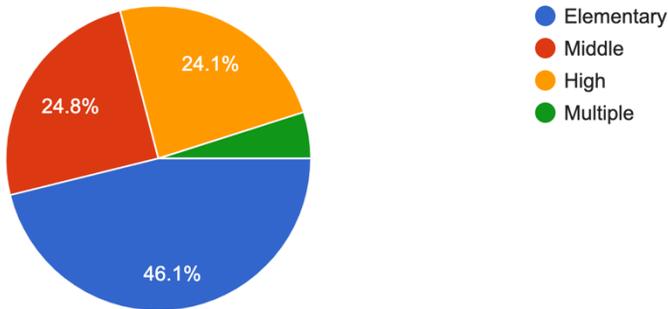
Do you share that concern?

- Yes
- No
- Please comment

**ATF Survey Results:**

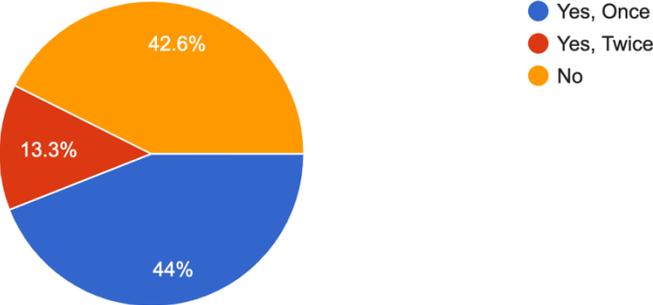
At what level do you teach?

427 responses



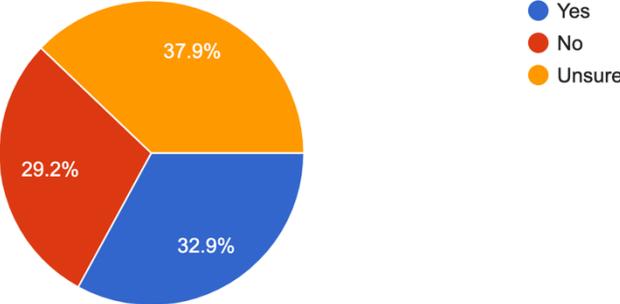
Have you completed a dossier?

427 responses



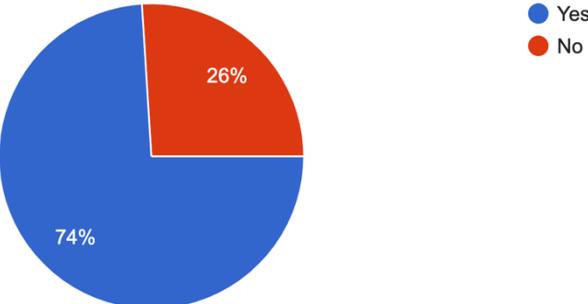
Do you agree with the changes proposed by the PED.

425 responses



Elementary teachers: ATF is concerned that the micro-credentialing work on top of the LETRS requirement is a heavy lift for beginning teachers. Do you share that concern?

304 responses



## Sample Comments:

### Teachers who agree with the change

It is a different type of pathway that allows teachers to work on their credentials without creating too much burden in a single semester.

I feel the microcredentials are a more structured and more instructive process

The courses will hopefully give new teachers more teaching techniques and strategies. The course work seems to be less subjective than someone grading work based on a rubric. The lower cost is simply respectful. The fact that we have to pay in order to advance our levels is ridiculous especially when it is required that everyone advance from level 1 to 2.

Yes! If I understand it correctly, I am able to move from a level 2 to a level 3 without a Masters Degree and Dossier. I would have gone to grad school already but having to go to grad school and then also spend a year completing the Dossier just seemed like a slap in the face. The whole process was not worth it. I understand this new process is still a lot of work and time investment but sounds overall more accessible than a Masters + Dossier.

Just as in the field of education, educators understand that students have strengths in different areas and need multiple opportunities and avenues to demonstrate proficiency, these same expectations need to be expanded to educators themselves. Taking into account the stresses and mental health of educators' personal/professional lives the micro-credential avenue for licensure advancement elevates some of the stress associated with successful submission, evidence gathering, and reflection of the three strands for the dossier.

In my opinion, it's better to train better teachers through micro-credentials than it is to have them write an essay that will be skimmed over. It would be nice to be able to substitute some of these micro-credentials for other extended learning credits. However, the quality and ethics of the organization does matter.

I have heard from and seen many amazing teachers struggle with the dossier process for a variety of reasons; teachers have struggled for reasons that go beyond their professional capabilities and capacities. For instance, paying \$300+ dollars to advance is a lot of money, especially for a level one teacher! Further, APS has denied me the ability to even begin my dossier, even though I am in my fourth year of teaching, because I did my first two years of teaching in Taos.

I am in support of this change because being able to advance my license within the next year doing the microcredentials gives me the clear pathway to advancement that I have been denied as a teacher who began teaching in the 18-19SY, one year before COVID hit and disrupted teacher evaluations.

I believe that by taking classes specifically designed for teacher development and mastery of what they are teaching would be better than having a teacher put together the massive details of how the dossier

is to be completed independently. I appreciate direct instruction.

I like the fact that it is a course-based advancement. I feel like it will be easier for me to fit into my life between work and family commitments. I also like that you can start it in advance of your actual leveling up.

Having the micro-credential courses that are skills-based rather than reflection-based will more properly justify good teachers for keeping jobs and provide more flexibility to meet the 85% completion online, rather than only getting feedback from a failed dossier strand after-the-fact.

I believe it will feel more attainable to complete while teachers are working. It also is more financially attainable since it is not expecting teachers to pay a large lump sum all at once with the fear that they will have to pay it again if not passing a strand.

Allows teachers to move at their own pace and is not a "one shot" deal. Seems less stressful. Hopefully the micro credentials are more relevant to the actual classroom experience and not just how well one can write a paper. I have seen really poor teachers write a great Dossier and really great teachers not pass their dossier. Also Micro credentialing allow from breaks if needed for family time/a baby etc. Dossier HAS to be done in one year.

#### Teachers who do not agree with the change

The new proposal changes a practice-based dossier that can be completed at one's own pace into a ridiculous amount of coursework to be done over 15 months. These changes weaken the licensure process into busy work as opposed to the current academic self-directed dossier. It's like going backwards in progress from an engaging project-based learning modality to a tedious multiple-choice test. This is exactly the opposite of what teachers are supposed to be doing in practice; student ownership. The proposed changes reduce teacher ownership. It also reduces the likelihood of teachers staying in our field.

The Dossier Process is more streamlined and faster for teachers to advance to the next tier. Micro-credentialling is just another way to make the advancement process longer and puts more work for teachers who have more than enough duties to do in their jobs. The Micro credentialling process should not take more than 1 year like the dossier process.

The process sounds great for someone who started teaching right after college. But for the teachers who made a career change to teaching and already have a Master's or Doctorate are at a great disadvantage. I do not wish to spend more money on a program or to be nationally board certified when I would like to obtain my doctorate and move into administration. It would be helpful to have the micro-credentials in hours required instead of weeks. I applied to start my dossier earlier this year and was denied because I did not have 3 evaluations. I will have my third evaluation in January 2023 which

means I won't finish the new program until around June 2024. I had already created a timeline and goal for the dossier. Under the new program, I would have not been denied earlier this year. Now teachers who have less experience than me will move to level 2 at the same time as me and many will not have a master's degree.

I think the credentialing process takes the most beneficial part of doing the dossier - it is an incredible professional development exercise and also allows teachers to practice the type of reflection necessary to complete National Board Certification in the future. I think that if changes want to be made, they should be made to the questions the Dossier asks (to include aspects that are important to the PED but that are not covered as in depth in the Dossier). Completing an "online" course is a joke and a waste of time. Completing a Dossier on the other hand forces teachers to think about why they do what they do in the classroom and how they can work to improve.

Teachers should still be given the option to write a dossier on our own time and pace and not have to be locked into micro-credential timelines.

It seems like too much to manage. I would much prefer to complete the dossier at my own pace instead of needing to map out my plan for the mini credentials (if I was at that point in my career.) I can imagine it will be a deterrent for some.

Having completed both the Dossier Process (once) and the National Board Certification process, I liked that the Dossier process aligns (somewhat) with what is expected on the National Board Certification. I don't think it should change. The Dossier Process also allowed some flexibility for teachers to work at their own pace.

I believe the dossier is a more rounded approach for evaluation and completion. Enacting so much extra coursework is even more on a teacher's plate.

The micro credentialing process is not yet guaranteed to provide feedback and two-way communication. Without that guarantee, it's just more hours of watching videos (like the 18 hours at the beginning of each year) and completing paperwork, without improving practice.

The dossier process was very effective in giving me the tools to really reflect on my teaching practices based on the 9 competencies that I was supposed to demonstrate. I did this for level three as well and was able to think even more into my teaching practice. From what I can ascertain, the new micro-credentialing rule requires more time of the teacher and less reflecting. It costs about the same from what I read in the chart but seems to tax the teacher more in terms of time outside of the workday. I would be overwhelmed trying to complete LETRS Training on top of those online courses if that were the pathway to advanced licensure. I already feel like our plates are more than full now that we are doing MTSS plans for attendance (for example). If PED wants to add in MTSS or MLSS as part of the dossier, then why not add a few questions that pertain specifically to that? Also, how do teachers show they are reflecting on their practice (much like they are required to do in the National Board Submission Process)? This credential pathway seems like it only requires that 85% pass rate.

The microcredentialing process, especially regarding the implementation and management of MLSS plans is highly subjective. How and why should a teacher be evaluated on the process of writing and implementing these plans; if the teacher focuses on Strand B- student learning, this is a deeper look into the demographic and dynamic in the classroom this component is self-explanatory. There are different ways to gauge if a teacher is implementing these plans. All of the current strands in the three-tier licensure system are objective, reflective and much more meaningful than a microcredentialing/micromanaging process.

The requirement for reflection inclines the applicant to critically consider what he/she will do in the future. "Embedding" the reflection into a skills-based, online program lessens this much-needed consideration. As well, by not requiring a masters or NBTC, we have dumbed down the teacher requirements just like what is being considered by PED right now (removing Algebra II from graduation requirements).

First, I am not sure why the dossier needs to be replaced. Secondly, I found that the process of the dossier was very reflective from beginning to end. I believe each time I completed one, I became a better teacher. As explained, the new system has teachers completing modules, which sounds expensive to me, but also doesn't engage them in the process as much as a dossier. The dossier is something for teachers to be proud of because it is we take ownership over something we have written and designed. Going through many modules sounds like memorization and application, boring!

#### Teachers who are unsure about the change

I'm interested in whichever process ensures better mastery and practice, while respecting our limited time and resources as active teachers. I'm close to leaving the profession altogether because of the many hoops and now extra costs.

It appears like teachers who are currently composing their dossier will be forced to wait another two years before advancement, which financially outweighs the \$20 they might save doing the micro-credentials. We get paid too little as it is.

I never had to complete a dossier to advance to level 2 because my student test scores were high enough that I didn't have to. However, I have looked into the dossier system and requirements, just in case. With that in mind, I like that the micro-credential system is "self-paced" and online, making it much more accessible than the dossier was. I'm not sure what the "courses" will actually look like, hence the "unsure" answer above, but I hope it's a huge improvement to the dossier system.

The proposed method of advancement seems to be straightforward, as well as cheaper. I am unsure how this will look in practice, and I am concerned about availability/time requirements. I would support having the option to choose a method until the process of micro-credentials has been shown to work well.

I am currently taking the first class. It has a lot of great information, and I feel like it is definitely benefiting my students. My only issue is that it is a little difficult to fit it in with all of the paperwork; not that big of a deal. My major issue is that I will not be able to be level 2 for a year and a half. I am still considering writing my dossier for this reason.

I think it sounds fine. However, I am starting my 5th year of teaching this upcoming August. I was completing my alternative licensure the first two years and then. I have been enrolled in LETRS this year and last so I have been planning to complete the requirements for leveling up next year. But the info provided for this new system says it will take 15 months. Will they have the program up and running in time for teachers to complete it within the needed time frame?

The systems seem similar and comparable in structure, time, and cost. The PDD is more educator driven while the micro credentials are PED driven. However, the topics addressed in the micro credentials are severe gap areas in NM public education.

I like that the micro-credentialing is skill based, however, I have some concerns. The first is that it takes over a year to complete, while the dossier is only one year. This means it will take longer to level up and receive a raise. I'm also concerned that the classes filled up so quickly, which makes the process take even longer. If it is all self-paced then there should be enough spots for all teachers and we should be able to complete it in one year.

I think it would depend on when the change takes place. I know a lot of teachers who are very close to being able to move up in a level. For them to have to start with this huge number of classes now instead of being able to be grandfathered in to writing a dossier may cause some teachers to leave the profession. If it applies starting only with new teachers or teachers who just moved to level 2, I could be in favor of it. I think the amount of time needed to complete it is a lot to ask of teachers, especially those who are already being asked to devote a lot of time outside of the duty day to LETRS training.

I'm wondering if the time commitment would be overwhelming for a first or second year teacher. They have several other requirements as they start their career. Would these courses make their lives harder or actually help them in building their lessons?

While the idea of micro-credentialing has the potential to assist educators in deepening their skills as professionals, I'm concerned about the particular micro-credentialing course types being mandated. Education is such a diverse profession and giving educators the ability to select which micro-credentialing courses they would like to fulfill from a predetermined list from the PED would allow educators to focus on areas, not only of interest, but of the most relevance to their area of instruction.

**ATF is concerned that the micro-credentialing work on top of the LETRS requirement is a heavy lift for beginning teachers.**

Comments from elementary teachers in agreement:

As new teachers we are required to attend LETRS training, TELL training while some teachers are going to grad school and continuing their professional development. It's a lot of added training for new teachers.

When are we supposed to teacher and plan? My students and family will suffer!

Teachers already have so much on their plate, their voices must be heard!

Teachers go through a rigorous process to get certified in the first place. Putting more and more unnecessary burdens on them will not improve our public education system in New Mexico. It will only drive teachers to other professional fields where they are actually treated as professionals.

Both proposals are very, VERY TIME CONSUMING. As educators we can only do so much on top of our regular workload.

Teacher retention must be the number one concern. The drop-out rates of teachers within the first five years of teaching is a huge concern.

I had to complete LETRS training twice since I did it in person and missed a day and doing it online was extensive and would rather have done it in person. Feel the stress of paperwork already on the new teacher's caseload is enough for now.

Comments from elementary teachers not in agreement:

I was in the first phase of LETRS, and it is quite a bit of work. HOWEVER, I do not believe that LETRS and micro-credentialing are themselves similar enough to warrant an either-or scenario. It is a lot of work, which is why teachers should be given more time to complete them, but both are important to showing mastery of necessary content.

LETRS is time consuming but essential information for everyone teaching reading. We are fairly compensated for our time. This is completely irrelevant to the question about micro credentialing.

**ATF's Comments**

As the leadership team of the Albuquerque Teachers Federation analyzed these responses, many questions about micro-credentials and the future of the "leveling up" process emerged:

1. If there is a writing component, who will evaluate it?
2. What is the accountability/criteria for understanding the content of the course?
3. Is a physical class an option to differentiate for adult learners?
4. Is the content of the courses differentiated for different teaching assignments?
5. How will the courses relate to teacher's individual practice and reflection?
6. How will this propel teachers forward as reflective practitioners in the state of New Mexico?
7. Will district evaluations continue to be a part of leveling up?
8. Who is designing the content, and what is their criteria?
9. How do the courses align to the New Mexico state competencies?
10. How will a teacher demonstrate mastery of the skill or area the course taught?
11. Are these courses research-based?
12. Has this system been used and proven to be effective at developing skilled practitioners and retaining educators?
13. What does NMPED expect the teaching cadre to look like after 5 years of implementation of this system?
14. What if a level 1 teacher "fails" or doesn't achieve a credential?

The profession of teaching is constantly evolving and we as practitioners are cognizant of the need to evolve our practices along with it. However, significant changes should not be done lightly and without meaningful stakeholder input.

We are hopeful that going forward the voices of educators will be heard, and the many diverse perspectives shared here will be taken into consideration when decisions that impact the professionals our union represents are made.