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November 4, 2021

Professional Standards and Teacher Education Board  
MSDE  
200 West Baltimore Street  
Baltimore, MD 21201

Dear Members of the Professional Standards and Teacher Education Board,

There has been a lot of work on the proposed licensure and program regulation changes, and I commend the Professional Standards and Teacher Education Board (PSTEB) for your tireless work in trying to ensure the new regulations help to maintain and promote the professionalism of our profession while aligning with the many changes in statute with the passage of the Blueprint for Maryland's Future. While we recognize strides made in the right direction in the crafting of the current proposed regulations, there are still many areas that need addressed. That is why we strongly believe the proposed regulations should not be promulgated.

As the president of the Maryland State Education Association, representing over 75,000 educators across Maryland, I come before you today to highlight some areas that are still in need of revision. We believe that these changes are necessary to not only help local districts carry out the regulations in an effective and feasible manner, but more importantly, to set in place good practices and remove unnecessary barriers for quality candidates to enter the profession and for dedicated, passionate educators to stay and excel in the profession. We are currently faced with an unprecedented and continuously growing staffing shortage in all areas of education, most critically in the classification of teachers. Regulations on licensure and programs should work to enhance and streamline the process for individuals to be successful and to assist school districts to meet the needs of their students and communities, not to increase confusion and put in place unnecessary bureaucracy. We believe the suggested revisions, among others brought forward, must be considered and addressed before the adoption of the regulations.

#### **Mentors as defined in the proposed regulations**

The proposed regulations 13A.07.06.09, Programs for Professionally Licensed Personnel, defines mentors as part of the clinical experience and makes them part of the formal evaluation process. Traditionally, mentors in Maryland have served in a non-evaluative, confidential capacity. See COMAR13A.07.05, Comprehensive Teacher Induction program. The traditional concept of a mentor was preserved in the Blueprint when it provided that *a mentor teacher for a teacher in an induction program shall be a highly competent teacher selected by the local school system who will work to instill in the teacher the skills and knowledge for the next generation of teachers*. We believe this is a valuable role in the system that is lost in the currently proposed regulations. Specifically, the proposed regulations conflate the definition of lead teacher (Level 4 Teacher Leadership Track) as defined in the Blueprint with that of a mentor as currently defined in the proposed Program regulations and relevant portions of the

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Blueprint. *Compare* 13A.07.06.02B(20) and 13A.07.06.09B. This fusion of two very distinct roles will make it difficult for educators to understand the role of mentors and will strictly limit the available number of qualified candidates to fulfill the critical mentor position. A position that is also pivotal to a peer assistance and review program of evaluation.

Personally, I have served as a classroom teacher and a mentor and know first-hand that when a new or struggling teacher relies on their mentor and is vulnerable as they work to improve their craft, the mentor cannot be effective if they have evaluative capabilities. The mentor can observe and provide assessment-type feedback on pedagogy and content mastery, but this must be separate from the formal observation and evaluation process. That, however, is not what is provided for in the proposed regulations. We believe a distinct mentor classification separate from a lead teacher must be preserved. The blending of positions/qualifications of a mentor and lead teacher will substantially limit the number of educators eligible to fulfill roles in the induction programs. Not having enough support for educators increases the chance for us to lose them which isn't the purpose of induction or career ladder programs.

#### **Testing requirements**

The current regulations have a series of testing requirements for teachers that are not fully aligned to the Blueprint which added additional tests within the statute. There needs to be alignment and an examination of the additional requirements being expected by statute before new regulatory tests are added. It is worth repeating that we are experiencing an educator shortage at crisis levels in many districts. It's likely to get worse before it gets better, compounded onto the fact that Maryland is an import state with a history of high turnover. We must stop the exodus of current teachers because we don't even have a pipeline to fill our current vacancies. So, adding more tests, and most often tests that are bias in construct, will not help Maryland retain or recruit educators, especially educators of color. We know that additional testing of students doesn't help them learn. Additional testing of teachers doesn't make them better teachers. Let's find a way to work smarter to figure this out and get it right.

#### **Out of endorsement area assignments**

The current proposed language relative to out-of-field assignments is completely untenable and will again work to drive educators from the profession when we should be working to keep them. Teachers are assigned to a placement to teach at the discretion of administration. Educators complete college preparation programs and seek endorsements for fields within the profession they choose and are passionate about teaching. I know because that's why I became an elementary school teacher and not a high school or kindergarten teacher. To receive an endorsement and truly be a professional teacher or related service provider, it typically requires four years of higher education and for some fields a master's degree is required. The proposed regulations state that someone assigned to teach outside of their endorsement area(s) must complete the needed coursework and testing to be fully certified for that additional area by the end of the year in which they were placed in that out-of-area placement. Someone will need to explain to me and our teachers how someone teaching in a subject area about which they know nothing while simultaneously taking college course in such a condensed window makes sense. How is that even possible? Not to mention if they have a family or need to work a second job just to make ends meet. Who would want to do that and

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how? Would any of you volunteer to take on that out-of-field assignment? You have a teacher who may have been kind to an administrator and a team player by agreeing to teach outside of their licensed field because the classes can't be offered to students and for their kindness they are crushed. Or, in those rare instances when an administrator wants to drive out a teacher, they could assign the teacher to those out-of-endorsement classes forcing that teacher to get the endorsement in one year which would instead likely drive them out of the school or profession. I would also point out to this board that there is more flexibility provided within the proposed regulations to adjunct teachers with no teaching certification than in this case. Furthermore, this language is not needed; it is not an element of the Blueprint. Let me remind you again—we have a teacher shortage.

### **Professional Development Points**

The proposed regulation also introduces Professional Development Points (PDP) and requires educators to complete PDP's related to five different areas to renew their licenses. While we support the importance of the five areas, we do not believe that all five elements are attainable for all educators equally during each renewal period depending on the individual academic achievements of the educator. Specifically, most content-specific courses are offered through degree programs, while pedagogy-based courses are more readily available throughout a teaching career. Therefore, we recommend collapsing some of the areas together. Since both are equally valid, we propose that either a content or pedagogy course would benefit educators and students. Requiring that the professional development opportunity require, separately, both components will most likely lead to educators not completing their renewal process and exacerbating the teacher shortage.

The four items described above are not the only areas that need further examination. There are other key items where there is misalignment between the Blueprint and the proposed regulations or simply items that were not thought through for local certification offices, administrators, and teachers to try to figure out and cracks which people can fall through that will negatively impact the current teacher shortage. I know you as a board have been trying to go through the proposed regulation language to address areas that need more attention, but with the late passage of the Blueprint and needed legislative changes, the proposed regulations are simply not ready for primetime. I propose the following lens through which to look at the regulations as you move forward: Are they intended to provide for a professional workforce through common sense and attainable pathways and are they regulations that further that goal; or are they set to have more bureaucracy, arbitrary hoops to go through, and create technical issues in certification offices and human resources departments already overworked and short staffed? As you ponder that thought, I would also encourage you to make sure you are applying a race equity lens to the proposed regulations as to not

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disproportionately set up barriers or remove needed supports for educators and teacher candidates of color. MSEA stands ready to collaborate on these regulations so when they are finally promulgated they truly meet the needs of ensuring we have a workforce in place and that Maryland is attractive to high quality candidates to provide all students the best public education.

Sincerely,

A handwritten signature in black ink that reads "Cheryl Bost". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Cheryl Bost  
President

