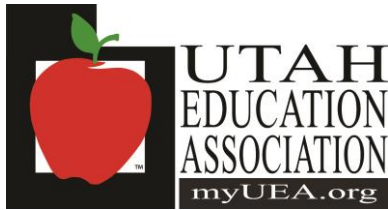


## R277-301, EDUCATOR LICENSING

Received final approval by the Utah State Board of Education on May 3, 2018

WRITTEN PUBLIC COMMENTS RECEIVED AS OF JULY 25, 2018



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## Memo

**To:** Utah State Board of Education

**From:** Dr. Sara Jones, Director of Education Excellence and Government Relations  
Utah Education Association

**Date:** July 16, 2018  
R277-301 Educator Licensing

**Subject:** USBE Public Hearing  
July 12, 2018

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UEA requested this hearing because we remain concerned that the new license framework fails to establish common, consistent and high standards of entry into the profession, no matter the licensing pathway. We acknowledge the very real difficulties facing schools that struggle to find teachers for every classroom in the midst of a teacher shortage.

But while the licensing changes may provide some help in hiring more teachers more quickly, the changes do not adequately prepare all teachers. And, these changes may exacerbate the teacher shortage by increasing the number of underprepared teachers in the classroom. Research by the Learning Policy Institute states:

“Having strong preparation for teachers enhances teachers’ sense of efficacy and their effectiveness, improving student outcomes. Strong preparation also increases the likelihood that teachers will remain in the profession. A comprehensive preparation program typically includes observing others teaching, student teaching at least a full semester, receiving feedback, taking courses in teaching methods, learning theory and selecting instructional materials. Teachers who enter the profession without these elements of preparation have been found to be two to three times more likely to leave the profession than those who are comprehensively prepared.” (*Solving the Teacher Shortage: How to Attract and Retain Excellent Educators*, Learning Policy Institute, Sept 2016).

To be clear, the alternate pathways the Board has created in this rule do not provide any of the elements just described as best practice for educator preparation. In addition, underprepared teachers place greater demands on their veteran colleagues who often work as informal and unpaid mentors to support new teachers. More underprepared teachers is not a formula for improving retention of either new or veteran teachers. While the intent may be to help relieve the teacher shortage, you may very well be creating higher teacher turnover. And while there are some unique circumstances when an alternate license pathway is necessary, this rule implements policy that could make alternate licensure

– that is a license where a teacher has not completed rigorous coursework and supervised teaching before becoming the teacher of record – routine and commonplace.

The UEA is asking the Board to take two actions:

First, we ask that the Board create a long-term plan to address teacher recruitment and retention. This plan should establish clear and incremental steps to ensure that within 10 years every classroom is led by a university-trained, professionally licensed teacher on day one.

With such a plan in place, the need for the types of short-term solutions in this rule are tolerable because it is clear the Board is committed to and moving in a direction that, over time, will result in highly prepared and effective teachers in every classroom.

This is a critical issue of student equity. Imagine your child could have a first-year teacher that graduated from a university preparation program that included extensive coursework and a supervised student teaching experience or your child could have a first-year teacher who has never actually taught a classroom of students and has had only a couple of learning “modules” before being left to learn and practice on the job as the teacher of record. Which teacher might you choose?

While an alternately prepared teacher may one day reach the qualifications to earn a Professional license, the concern is timing. University prepared teachers will enter the profession with a certain level of knowledge, training and experience. But, alternately prepared teachers, by definition, will only gain that experience once they are in the classroom instructing students. And even one year with an underprepared teacher can negatively impact a student’s learning for years. It’s just not possible that two such different preparation pathways both meet Board strategic goals of ensuring student equity.

We ask that the Board take immediate action to convene a work group to develop a plan which establishes clear and incremental steps to ensure that within 10 years every classroom is led by a university-trained, professionally licensed teacher on day one.

Second, we ask that the Board amend specific language in the rule. The purpose is to create critical safeguards that allow for alternate preparation while ensuring that more rigorous and comprehensive university preparation is not replaced by pathways where teachers are left to learn on the job.

We ask for a specific language change to create these safeguards by adding a definition of “Board-approved educator preparation program” in the definition section.

The Associate license allows candidates to earn a license in one of two ways - by being enrolled in a Board-approved educator preparation program (line 223) or by completing several professional learning modules (described in lines 217-222). However, there is no definition of a “Board-approved educator preparation program”. And it has recently become clear that a Board-approved educator preparation program does not mean only a university preparation program.

During a recent committee discussion of rule R277-303 it was stated that a “preparation program” could be an LEA program or even Teach for America. Such alternative programs do not require completion of coursework and supervised student teaching before becoming the teacher of record. They require on-the-job learning and are simply not equivalent to a comprehensive university

program. Without a clear definition, you will increase the number of underprepared teachers in our classroom.

Let me clarify:

- An Associate license candidate must either be enrolled in a Board-approved educator preparation program – the traditional route (line 223) – or complete specific professional learning modules designated by the Board – the alternate route (lines 217-222). Without a definition, and as currently proposed, an LEA could be a Board-approved prep program.
- Candidates enrolled in a “preparation program”, LEA-based or university-based, do not have to complete any of the specific learning modules required in this rule (lines 217-222). In other words, someone could be teaching full-time while being simultaneously enrolled in an LEA prep program, having completed neither a university education program nor even the minimal learning modules required in the rule. All learning will take place on the job.

It was clear from committee discussion the intent of the professional learning modules was to ensure any alternately prepared teacher not enrolled in a university preparation program, complete learning module requirements before receiving the Associate license. We ask that you correct this oversight and amend the rule to define educator preparation program as a university program.

The remaining concerns are related to the LEA-specific license:

1. The Board fails to set any minimum standard for the LEA-specific license, other than requiring a background check and ethics review.

The LEA will set all requirements for education, experience, content knowledge and pedagogical skill. This is a change from and a lower standard than the Board previously required for the LEA-specific license.

In the previous licensing rule R277-503-8 for an LEA-specific license the Board required core subject teachers have a bachelor’s degree and pass a content knowledge test and non-core subject teachers must have a degree or skill certification and “skills, talents, abilities specific to the teaching assignment.”

But, the current rule only states that content knowledge and pedagogy requirements will be set by the LEA (lines 343-344) and there is no requirement whatsoever that the LEA require a bachelor’s degree or skill certification.

To be clear, because the Board has turned complete control of licensing standards over to the LEA for the LEA-specific license, we could expect a hundred different licensing pathways for the LEA-specific license because each LEA will create its own requirements with no common, state standard.

Without any state-established standards it is puzzling to think on what basis the Superintendent will approve an application for an LEA-specific license (as required in lines 309-310) because the LEA must only adopt a policy which “includes educator preparation and support” (line 313) and there is simply no substance to such a requirement. With no statewide standard how will the Board

evaluate whether to renew an LEA-specific license (as required in lines 330-331) when there might be a hundred different LEA licensing pathways? It appears the Board will have very little authority in vetting LEA-specific licenses.

This is a serious concern because currently the Board places no limits on how many LEA-specific licenses can be issued and places no limits on how many times an LEA-specific license can be renewed. Therefore, the Board sets no expectation that educators with an LEA-specific license ever achieve the qualifications of the Professional license. The Board has created two completely different standards of licensure.

We ask that the rule be amended to re-instate previous education and content knowledge requirements and to add minimal pedagogy requirements for an LEA-specific license to create consistency across the state.

2. The rule fails to place any limits on the LEA-specific license.

This is a change from and a lower standard than the Board previously required for an LEA-specific license. In the previous licensing rule R277-503-8 for an LEA-specific license the Board required that an LEA must “demonstrate that other licensing routes for the applicant are untenable or unreasonable.” This language has been deleted in the current rule.

The removal of language that qualifies when an LEA-specific license is appropriate is a serious cause for concern. With no limit on the use of an LEA-specific license what is to prevent the license from becoming commonplace rather than being used for exceptional circumstances? Furthermore, Board documents dated August 2017 depict a chart showing a two-tier license structure with a third option, the LEA-specific license. Above the description of the LEA-specific license the document states this license is for when other licensing routes are “untenable or unreasonable.” Clearly, the intent of the LEA-specific license was to maintain the same limits from the previous rule, yet this language was removed.

We ask that language requiring an LEA to demonstrate all other licensing routes are “untenable or unreasonable” be re-instated so it is clear the Board’s expectation is that preparation is best completed through the associate/professional license route and the LEA-specific license is an option for unique circumstances, not to become routine or commonplace.

3. The rule fails to create sufficient transparency for the LEA-specific license.

It can be difficult for those who work on education policy to understand details of licensing, but it’s even more difficult for parents to understand the differences between the Associate, Professional and LEA-specific license and the impact on a child’s learning, unless there is great transparency. Lines 366-373 require a school to “prominently” post information on a school website including 1) if the school employs individuals with the LEA-specific license, 2) the percentage of each type of license held by educators and 3) a link to the state Educator Lookup Tool.

What is missing in these requirements is seeing the actual policy. The Board has established no requirement that an LEA post the policy outlining the qualifications and criteria adopted by the LEA to employ someone with an LEA-specific license. So, a parent could readily find

information showing their school employs people with different types of licenses – the Board has required the reporting of numbers – but there is no context to explain the reported data. Parents should not be left to wonder about the differences between licenses, or be left to search out on an LEA website what policies have been adopted.

We ask that you add language requiring that schools employing educators with an LEA-specific license post or link to the LEA policy which defines qualifications and criteria for receiving an LEA-specific license.

Finally, many other licensing rules will be revised over the next few months. Inconsistencies and concerns with the current rule will become clear as other rules intended to align with the framework in R277-301 are drafted. No definition for “educator preparation program” is one example. This was not initially a concern because it was thought there was a shared understanding that preparation program meant a university program. But, as it’s become clear that a preparation program could be an LEA or Teach for America, a definition becomes essential. That is why it is critical the Board commit to revisit this rule before it goes in to effect in January 2020 to ensure there are no unintended consequences.

In conclusion, we ask that at the August 2, 2018 Board meeting the Board adopt specific amendments to R277-301, as outlined above, to ensure appropriate safeguards and create clarity and transparency. We also ask the Board to develop a long-term plan to address teacher recruitment and retention.

**From:** Dayna Shoell <[daynashoell@hotmail.com](mailto:daynashoell@hotmail.com)>  
**Sent:** Wednesday, July 11, 2018 3:08 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-301. Educator Licensing.

My name is Dayna Shoell. I teach first grade in a high-needs Title 1 school in Utah. I believe the new educator licensing rule, R277-301, will negatively affect the faculty and students at my school unless some important changes are made. Here is what I understand the rule to be: Beginning in 2020, a person who wants to teach at the elementary level will not need to complete an accredited teacher-education program. One option for obtaining an Associate level teaching license will be similar to the current APT requirements and will require a background check, an ethics review, a bachelors degree in any field, passage of a Content area test (e.g., Praxis), and, according to lines 217-223: "Successful completion of professional learning modules created or approved by the [district] Superintendent in: (i) educator ethics; (ii) classroom management and instruction; (iii) basic special education law and instruction; (iv) the Utah Effective Teaching Standards."

All of this means that the instructor in the classroom could be someone who has no expertise in teaching except for the 4 modules listed above. My concern is that the rule does not specify what a module is. What are the objectives? What will people know and be able to do at the end of each module? How will they demonstrate success, and who will determine what that looks like?

I recently renewed my educator license and completed the Educator Ethics module: It's an online lecture that takes about 45 minutes to complete, and it ensures successful completion because it provides all of the answers to the multiple-choice quiz as one takes the quiz. It does not model rigorous, engaging, or highly effective instruction, as teachers are expected to provide their students.

The proposed licensing rule contains no language defining what the "professional learning modules" will look like or require, and it puts the onus on school districts or individual charter schools to take over the duties of university-level teacher training programs. Schools districts and charters do not have the infrastructure or the resources to assume these responsibilities. Because of this, the other three "professional learning modules" could look very similar to the current ethics module, providing about four total hours of low-quality instruction. If this is the case, the new licensing structure will do very little to prepare people to succeed as classroom teachers. Any new licensing rule needs to ensure that people who have aspirations to teach elementary school successfully complete rigorous courses in fundamental teaching practices (e.g., lesson planning, effective teaching methods, assessment, and recognizing and accommodating student differences) without leaving the job to the already-stretched resources of public school districts to provide it.

Another essential component of all teacher-education programs that both the current and proposed educator licensing rule neglects completely is a quality internship (or student teaching) experience before new teachers become responsible for their own classrooms. Practically every occupation--cashier, cosmetologist, electrician, graphic designer, engineer, technical writer, account manager, physician--requires some form of shadowing or internship before workers are expected or allowed to perform their jobs independently. In planning, preparing, providing, and assessing the outcomes of

instruction, and in addressing the needs of students, teachers make hundreds of decisions every day that directly affect children's mental, emotional, and physical health and achievement. Aspiring educators need to watch and participate in those decisions, with real-time, one-on-one guidance and assistance from effective, experienced mentor teachers, not just a person who checks in once a week after school to ask how things are going. Just as important, when students have a brand-new teacher with no classroom experience and possibly very limited pedagogical knowledge, they deserve to know that a proven, competent supervising teacher is there to ensure a safe, high-quality learning environment.

Becoming an effective educator is a steep learning curve, even for people who complete teacher preparation programs and have a successful student-teaching experience. People who have no training to teach are unprepared to meet the rigors of the profession. The USBE recently posted a document called Education Elevated, which explains the board's "Statewide Indicators of Excellence for Each Student." It lists goals for significantly increasing student achievement in many academic areas within the next four years (by 2022). However, the new educator licensing rules that the board has written represent a stunning disconnect between its ever-increasing expectations for students and its watered-down requirements for the people whose job it is to help an increasingly diverse student population meet those Indicators of Excellence.

I realize that the new licensing structure is in large part a response to the shortage of qualified teachers in Utah. However, currently, ARL/APT teachers are not solving the teacher shortage crisis, and the majority of ARL/APT teachers struggle. Also, the inequities this rule creates for high-needs schools are unacceptable. At my school we had 15 provisional (first three years in the classroom) teachers last year, a number of whom were ARL/APT. I asked the principal at my school how it has affected her job. She said this: "It does add to the workload of administration in several ways. There are more observations that need to be done. There are more times where administration has to find resources to help the ARL teacher. There are more conversations to be had about whether the job is right for the ARL teacher. Usually . . . the ARL struggles with student behavior. They also struggle with understanding and being prepared to teach the curriculum assigned to their grade level. There is also a cost to the other educators in the building. Each team has to put a lot of effort into supporting and teaching an ARL member."

An instructional coach in my school who has mentored five APT/ARL teachers in the last three years reports this: "The impact of having so many provisionals and ARLs year after year with high turnover is crippling to a school. There are students at our school who have had an ARL/APT teacher 4 years in a row and will likely have an ARL/APT teacher every year of elementary school. The impact on student learning is significant."

The current ARL/APT licensing system, as well as the one the Board had adopted for the future, is short-sighted because it deprofessionalizes the teaching profession, puts added strain on the public school system and on career teachers and administrators, sets unprepared teachers up for failure, and most important, decreases the quality of education for students. The students at my school cannot afford to spend even one year with an instructor who doesn't know the curriculum or the fundamental skills of teaching. High-quality preparation, including relevant coursework and a closely supervised internship, should be required for any form of educator licensing.



**From:** Jeremy Reynoso [<mailto:Jeremy.Reynoso@slcschools.org>]

**Sent:** Thursday, July 12, 2018 5:01 PM

**To:** Austin, Lorraine <[lorraine.austin@schools.utah.gov](mailto:lorraine.austin@schools.utah.gov)>

**Subject:** Comments for public hearing on R277-301 to the Utah State Board of Education

Board Secretary Lorraine Austin,

My name is Jeremy Reynoso and I am including here my written comments in opposition of parts of the new R277-301 educator licensing rules. I am a relatively new educator with 3 years of teaching experience as a kindergarten teacher in Salt Lake City School District and I believe it is vitally important for any new licensure rules to be clear in their rigorous expectations for licensed teachers.

From lines 216-223 under heading Associate Educator License Requirements professional learning modules are described as: ethics, classroom management, basic special ed. law and instruction, utah effective teaching standards. I am opposed to these requirements as they do not inspire confidence in me as what I believe is sufficient pedagogical experience for a new teacher. These modules seem to attempt a replacement of Pedagogy or Praxis (supervised practice and guided reflection) that most schools of education require of pre-service teachers. This cannot be accomplished through teaching modules alone.

If this element of the licensing rules remain unmodified, our teaching profession will be suffer damage in reputation but also in our effective teaching for students. We cannot afford to erode the trust Utah schools have worked so hard to build within our respective communities. Inequalities will arise, affecting our most vulnerable populations, as more teachers are not the equivalent of more qualified/prepared teachers.

Additionally from my understanding of the Requirements or LEAs starting on line 345, I find the new rules to impose additional burdens on LEAs which I view as unsustainable without significant investment in training for new LEA staff to carry the burden of new teacher mentorship.

Best,

Jeremy Reynoso

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**From:** Robert Leinbach <[byunc73@gmail.com](mailto:byunc73@gmail.com)>  
**Sent:** Monday, July 16, 2018 10:18  
**To:** Board Rule Comments  
**Subject:** Rule 301

I am writing to offer feedback on the proposal to reduce certain qualifications for educators in Utah as per a news article I read last week.

I believe the reason for this proposal is attract more teachers to fill a growing demand.

My experience with the education system in Utah for the past four years involves substitute teaching and bus driving. In both opportunities I could sub teach or drive every school day. Either department would probably hire me full time if my schedule allowed.

Because I am not licensed to teach in Utah and because I do not work full time for either department, I am paid at the lowest level.

Wages:

Teacher: \$82/day (about \$11/hr)  
Driver: \$19/hour

The teacher pay is the same now as it was when I started four years ago. Driver wages have gone up three times.

When I schedule work, my first choice should be obvious.

I realize my perspective on this issue is much like the "Blind Men and the Elephant"-it's limited. My experiences do not include benefits, etc., just basic income.

In my work experiences since getting my BA in 1973, I have had only one job that required a degree-teaching in Utah. Financially, it's the lowest paying job I have had. I do it, frankly, because I think I can help others. But, when it comes down to it, I drive much more than teach because of the income difference.

Lower standards would not have been more incentive to teach; only higher benefits.

A state jeopardizes the well being of it's people when it places education at a lower priority.

Robert Leinbach  
Lisa Cummins' District

**From:** Carla McGee [<mailto:camcgee76@gmail.com>]  
**Sent:** Tuesday, July 17, 2018 9:27 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** new hiring of teachers policies

Board Members,

I am a teacher and parent in a small rural community. I attended your meeting on July 12, 2018, which was a special hearing from a request by the UEA.

I would like to share with you some of the things happening in my district which is directly influenced by the proposed policies.

We have a large percentage of teachers who are not qualified to be in the classroom as our administration has told us they are planning to hire unqualified teachers to fill the positions left vacant so they can grow their own teachers. We have a high rate of turnover in our staff for various reasons. One being there is more money in other districts and our district can not compete with the larger districts in pay.

However, without more clarification and guidelines as to when and how long they can employ these employees (many are straight out of high school with no training) our district will continue to practice hiring unqualified teachers.

In one of our schools this past year a young girl was hired to teach a sixth grade class who had little or no schooling outside of high school. When a fellow teacher asked the district why they hired her as there was a qualified teacher who applied for the position and they bypassed him to put this young girl into the classroom. She was told because they won't stay and we are growing our own. The students did do well on their testing as the other two teachers exhausted themselves making sure the students were prepared. So essentially what happened was the seasoned teachers were running their own classroom as well as her classroom. These teachers are now questioning if they want to continue in the profession.

I work in three different schools. Let me give you a rundown of just those schools and who they have on ARLs or just plain no schooling.

School #1-- last year had only 2 (one being a special ed teacher) teacher not yet qualified. This coming year they will have 3 new teachers who are under-qualified. These teachers did an amazing job with the assistance of a great staff and principal as their support. Teachers spent many extra hours after school and before school assisting these teachers to ensure their success as well as the students.

School #2--This is a struggling school. Last year there were 3 teachers who were under-qualified. I watched in this school how the students were struggling to learn from these teachers as well as the teachers struggling to teach and have any kind of classroom management. This school had 1 teacher who was qualified to oversee and mentor all of the other teachers as none of the teachers were off their probationary status in this school. Although she did her best... she chose to move to a different school for this coming year and would have retired had she been left to mentor these teacher a second year. She was stressed and exhausted.

The kindergarten teacher had some schooling, but had not desire to teach or become a teacher. She accepted the job as a 1 year stint and has moved to a new position in her field for the coming year. What I saw in this class is a lack of understanding classroom management as well as (the most alarming thing to me) the students were not being taught the correct way to even learn the alphabet to be able to read. This is the most important age to learn the correct ways to pronounce the sounds to make it possible to sound out words and they were lacking this basic skill. This was not because the teacher was not trying, she just did not know how to teach the students as she did not have the training to do so.

This coming year in this school, we retained only 2 of the 8 teachers to come back for this coming year. Of the new hires they will have 2 unqualified teachers in the classrooms. The district moved some seasoned teachers into the school and have hired unqualified teachers to teach in the positions previously held by these teachers.

I was told in our Jr. High we have about 30-45 percent of the staff unqualified to be in the classrooms. In the high school it is about the same. I am aware of at least 2 unqualified teachers in each of the elementary schools.

I am also aware that there is a teacher shortage. However, it is my understanding qualified teachers are being bypassed as they hire younger unqualified teachers so they can grow their own.

Please look over these policies again with the recommendations from the UEA and revise them so our students get the education they deserve and we keep our teachers who are qualified in the classrooms caring for and teaching our children. As a parent (as well as a teacher) of a now 7th grader, this is extremely important to me.

Thank You  
Carla McGee

**From:** Denise Willmore <[denise.willmore@hsgfellow.org](mailto:denise.willmore@hsgfellow.org)>  
**Sent:** Tuesday, July 17, 2018 4:16 AM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** Licensing changes

Dear Ladies and Gentleman of the Schoolboard,

I am writing in opposition of the proposed licensing changes. The changes in licensing will not ensure that the state of Utah is attracting qualified candidates that are committed to stay in the profession. In fact, I see the opposite occurring. Individuals will see the proposed licensing structure as an opportunity to enter the field because they see teaching as an easy career/job.

It is the responsibility of the board to ensure that every child in Utah has a qualified, prepared educator in every classroom. The current licensing structure only ensures that there are individuals in classrooms and not necessarily qualified to teach when entering the classroom.

This past school year, my school hired an individual that was an APT candidate. She began her career as an engineer and had left the field to raise her family. When returning to work she began working again as playground assistant, enrolled in alternative teacher prep program, and claimed that she had substitute taught. She had not completed student teaching but would do that while she was in her first year of teaching. This individual was hired due to her expressing that she was willing to learn and was willing to do whatever it took to be a successful teacher.

I was assigned as her mentor and within a few short days it was very evident that she was ill prepared to be a classroom teacher. I observed students ignoring her instructions, running down the hall, rolling on the floor, and very little instruction occurring in the classroom. She also had difficulty instructing using the standards as her guide and teaching developmentally appropriate material. She was clearly lacking pedagogical experience and training which she would have obtained during her student teaching experience prior to entering the classroom. When I offered some coaching she responded by saying, "I am an engineer, and this is not rocket science."

In this case, she resigned in February because she realized that she was not prepared and that teaching elementary school was not a good fit. Prior to leaving she expressed that every teacher she had ever observed made it look really easy and she was expecting a much different transition into the field. In the long run, the students

in her class suffered because they did not get quality instruction for the first six months of the year.

I give you this example because I fear that this will be the norm of my profession in the near future, and not the exception. The issue of the teacher shortage is not due to the current licensing requirements it is a much larger problem than finding anyone off the street to become an educator. Many teachers express their frustrations with being overworked, extensive time spent on testing, large class sizes, and not enough resources to assist all students. I urge you to take a look at these issues rather than making the proposed changes in licensing.

All that the current licensing changes will do is I escalate an increase of work for current educators. Many districts do not have extensive mentor programs. In my district, each mentor receives a payment of \$100. per year and educators are spending numerous hours assisting less than qualified individuals. After my experience as her mentor, I was exhausted and spent far more hours working with her than compensated.

Sincerely,

Denise Willmore  
2nd Grade Teacher Valley View Elementary

**“No calling in our society is more demanding than teaching; no calling in our society is more selfless than teaching; and no calling is more central to the vitality of a democracy than teaching.”**

—Roger Mudd in Learning in America: Schools That Work-

To Whom It May Concern:

Please heed the clarion call from our collective wisdom as parents and professional educators.

Consider the possibility that State Board Rule R277-301 Educator Licensing is an oversimplified and inherently flawed attempt to solve long-standing problems created by corporate interests and private profiteers’ privatization of public institutions for financial gain. Our public best interests are not served.

It may be that we are approaching teacher recruitment, retention, and licensure (R277-301 Educator Licensing) wrongmindedly and in so doing, missing a greater opportunity that rarely presents itself.

We have the timely opportunity to help direct the future course of our neighborhood public schools. However, it involves the complicated maneuver of tacking into the headwinds of change. If done well, we could collaboratively create a shared vision for our public education system with vibrant public schools that all of us, students, parents, educators and community members will be a proud part of.

I love teaching; I have for over 40 years. Other than parenting, teaching is the most challenging, time consuming, creative, rewarding, and life defining work I have ever done. Although I have been retired now for three years, I am still actively engaged in mentoring new educators, attending local and state school board meetings, and lobbying for public education at the local, state, and national levels.

Roger Mudd accurately describes the “calling”. I never set out to teach; however, I did want to serve in a way that helped others. Because my own life was blessed with compassionate caring people, I was guided into life-long learning in practicing the art of teaching in both urban and rural schools since 1977.

As educators in 1983, we witnessed A Nation at Risk move public education to the top of the national agenda, but the report also became a catalyst for today’s so-called “education reform” movement.

In some ways, A Nation at Risk was helpful, but what we’ve seen in the past 35 years are too many misguided efforts that have compounded the problems the report identified. Misunderstanding has always distorted policy and practice in education, but the consequences have grown more severe with each passing decade. Because both the problem and the solutions are based on fundamental misdiagnosis, education reform has done enormous, perhaps irreparable damage.

Education reform is nothing new. For more than 35 years we’ve been running in circles, trying to cure an ailing society by attacking public education and the educators who serve. We’ve been castigated and denigrated over the years for not being capable (“Those who can, do. Those who can’t do, teach”), not knowing enough (requiring continual professional development), not working hard enough or long enough (Summers off myth), and under scrutiny to the point of requiring finger-printing every 5 years.

Educators work hard to give their students the great education they deserve, but we cannot keep pulling the rug out from under them and overburdening them with ill-conceived and just plain bad ideas.

We need to do what we know works...Valuing education and respecting educators’ authority works.

We know that parents want well prepared educators who care enough about their child to get to know them and have a plan to help that child be as successful as they are capable of becoming.

We know, sadly, that even though young people for decades now have been warned against pursuing a career in education, that many of our best and brightest would do so IF they were encouraged to do so.

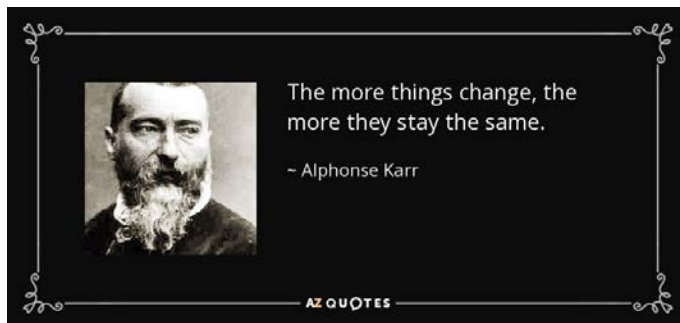
We know that Americans generally, and Utahns specifically will rise to the occasion and meet the sometimes difficult challenges presented to us as opportunities to create significant social changes.

“...Utah is not the biggest state in the union nor are we likely to be the most powerful economically or politically. But in a world where many grope for a sustainable core, we can play a vital role. Utah must be a place of quiet quality, a mentor state. a place where people pass on to future generations the ageless values...” -Governor Michael Leavitt- “Keeper of the Flame” January 1996

We have an opportunity now to recruit and retain the best and brightest students into our Utah public schools as teachers, if we are willing to spend the time and resources necessary to have the deliberative conversations about what our shared vision is for the investing in our children’s future. We could do it!

...Finland did it.

We can actually utilize **some** of the good work already done and hopefully, not misuse some ideas again.



### **The Tools at Hand: from A Nation at Risk (1983)**

It is our conviction that the essential raw materials needed to reform our educational system are waiting to be mobilized through effective leadership:

- the natural abilities of the young that cry out to be developed and the undiminished concern of parents for the well-being of their children;
- the commitment of the Nation to high retention rates in schools and colleges and to full access to education for all;
- the persistent and authentic American dream that superior performance can raise one's state in life and shape one's own future;
- the dedication, against all odds, that keeps teachers serving in schools and colleges, even as the rewards diminish;
- our better understanding of learning and teaching and the implications of this knowledge for school practice, and the numerous examples of local success as a result of superior effort and effective dissemination;



- the ingenuity of our policymakers, scientists, State and local educators, and scholars in formulating solutions once problems are better understood;
- the traditional belief that paying for education is an investment in ever-renewable human resources that are more durable and flexible than capital plant and equipment, and the availability in this country of sufficient financial means to invest in education;
- the equally sound tradition, from the Northwest Ordinance of 1787 until today, that the Federal Government should supplement State, local, and other resources to foster key national educational goals; and
- the voluntary efforts of individuals, businesses, and parent and civic groups to cooperate in strengthening educational programs.

### **Findings Regarding Teaching: from A Nation at Risk (1983)**

The Commission found that not enough of the academically able students are being attracted to teaching; that teacher preparation programs need substantial improvement; that the professional working life of teachers is on the whole unacceptable; and that a serious shortage of teachers exists in key fields.

- Too many teachers are being drawn from the bottom quarter of graduating high school and college students.
- The teacher preparation curriculum is weighted heavily with courses in "educational methods" at the expense of courses in subjects to be taught. A survey of 1,350 institutions training teachers indicated that 41 percent of the time of elementary school teacher candidates is spent in education courses, which reduces the amount of time available for subject matter courses.
- The average salary after 12 years of teaching is only \$17,000 per year, and many teachers are required to supplement their income with part-time and summer employment. In addition, individual teachers have little influence in such critical professional decisions as, for example, textbook selection.
- Despite widespread publicity about an overpopulation of teachers, severe shortages of certain kinds of teachers exist: in the fields of mathematics, science, and foreign languages; and among specialists in education for gifted and talented, language minority, and handicapped students.
- The shortage of teachers in mathematics and science is particularly severe. A 1981 survey of 45 States revealed shortages of mathematics teachers in 43 States, critical shortages of earth sciences teachers in 33 States, and of physics teachers everywhere.
- Half of the newly employed mathematics, science, and English teachers are not qualified to teach these subjects; fewer than one-third of U. S. high schools offer physics taught by qualified teachers.

## Recommendation D: Teaching

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**This recommendation** consists of seven parts. Each is intended to improve the preparation of teachers or to make teaching a more rewarding and respected profession. Each of the seven stands on its own and should not be considered solely as an implementing recommendation.

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1. Persons preparing to teach should be required to meet high educational standards, to demonstrate an aptitude for teaching, and to demonstrate competence in an academic discipline. Colleges and universities offering teacher preparation programs should be judged by how well their graduates meet these criteria.
2. Salaries for the teaching profession should be increased and should be professionally competitive, market-sensitive, and performance-based. Salary, promotion, tenure, and retention decisions should be tied to an effective evaluation system that includes peer review so that superior teachers can be rewarded, average ones encouraged, and poor ones either improved or terminated.
3. School boards should adopt an 11-month contract for teachers. This would ensure time for curriculum and professional development, programs for students with special needs, and a more adequate level of teacher compensation.
4. School boards, administrators, and teachers should cooperate to develop career ladders for teachers that distinguish among the beginning instructor, the experienced teacher, and the master teacher.
5. Substantial non-school personnel resources should be employed to help solve the immediate problem of the shortage of mathematics and science teachers. Qualified individuals, including recent graduates with mathematics and science degrees, graduate students, and industrial and retired scientists could, with appropriate preparation, immediately begin teaching in these fields. A number of our leading science centers have the capacity to begin educating and retraining teachers immediately. Other areas of critical teacher need, such as English, must also be addressed.
6. Incentives, such as grants and loans, should be made available to attract outstanding students to the teaching profession, particularly in those areas of critical shortage.
7. Master teachers should be involved in designing teacher preparation programs and in supervising teachers during their probationary years.

Let's spend the time necessary for deep-dive community dialogue and work together to create the world-class education that parents want and all children deserve.

Thank you for the opportunity to comment.

Ryan Anderson

July 19, 2018

**Memo: R277-301**

Dear Utah State School Board Members,

Thank you for your efforts to create the best possible education situation for the children of Utah. Your work does not go unnoticed.

I want to begin by providing a few insights from the June Law and Licensing meeting. I was not able to attend the last meeting in person, but I watched it via video. I was impressed by two state leaders who expressed a preference for hiring university-prepared teachers.

Terry Shoemaker, of the Utah Superintendents' Association and Utah School Boards Association explicitly stated: "our preference has been and will continue to be to hire from the traditional teacher prep programs." In addition, Royce Van Tassel, of public charter schools, added that most charters prefer to hire from university programs.

At the same meeting, I was pleased that Board Member, Terryl Warner, wondered how to solve the teacher shortage. She had great questions and a recognition of the need for Utah's teachers to be university prepared. She suggested creating more incentives such as loan forgiveness. I applaud these desires.

I would add that more scholarships should be available for those who would like to be K-12 educators. If scholarships were available, that might incentivize more people to major in teaching as an undergraduate or go through a licensure program as a Master's degree.

According to current research from Envision Utah, in 2017, teachers from university programs were found to make up only 1/3 of new teachers. Regarding the teacher shortage, Jason Brown of Envision Utah stated that teachers who don't come from traditional university programs are twice as likely to leave the profession each year. These statistics generated under the current licensing structure inform us that the new structure needed to maintain high standards for teacher preparation, not decrease the standards.

My request to the board is to create special licensure for emergency situations or rural districts but require the majority of licensure candidates complete a high-quality teacher preparation program so that every child, no matter their zip code, has a quality teacher.

Thank you for your desire to listen to public comment,

Marilee Coles-Ritchie, PhD  
(speaking on behalf of myself)

Envision Utah information: <https://www.envisionutah.org/projects/education>

**From:** michele jones <[4michele.jones@gmail.com](mailto:4michele.jones@gmail.com)>  
**Sent:** Thursday, July 19, 2018 4:35 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** R277-301 Educator Licensing

Hello,

I am writing with regards to the proposed new licensing rule amendments being proposed. I appreciate the complexity of this issue and that the Board recognizes that there are flaws in the current system that you are trying to fix. However, many of the proposed changes are very concerning to me.

I am a mathematics teacher in Granite School District going on my 7<sup>th</sup> year of teaching. I am also a parent of a child who attends public schools. As a math teacher and a parent I understand the pressure the teacher shortage is creating. However, I believe that creating routes that do not require comprehensive university preparation, including a rigorous student teaching component, will lead to more underprepared teachers in our classrooms, increasing pressure on both new and veteran teachers, and ultimately leading to higher teacher turnover. I have seen this happen personally in my building several times.

I support an ARL path that has a sunset, to ease the pressure of the current teacher shortage while also implementing plans to increase the desirability of teaching careers. Our students deserve to have true education professionals who enter the classroom trained in behavior management, ELL/ESL strategies, GT/exceptional learner strategies, SPED strategies, restorative justice, lesson design, technology resources, effective differentiation, questioning and engagement strategies, and psychological development, and not just experts in their content.

I urge you to consider the recommendations suggested by UEA, I believe they address both the short term needs and long-term goals of our public classrooms.

Thank you,  
Michele Jones  
Level 4 Mathematics Teacher  
Cyprus High School

**From:** Linda Patrell-Kim <[ljpatrellkim@me.com](mailto:ljpatrellkim@me.com)>  
**Sent:** Thursday, July 19, 2018 4:13 PM  
**To:** Board Rule Comments <[rule.comments@schools.utah.gov](mailto:rule.comments@schools.utah.gov)>  
**Subject:** teacher licensure

Good Afternoon

My name is Linda Patrell-Kim. I am speaking as a concerned teacher and a concerned parent.

1. In this rule, line 73, it states that the requirements of the rule are to ensure that only highly qualified individual enter into licensure programs and this is determined by academic success, basic reading, writing, and math skills, and passing a pedagogical assessment.
2. The requirements for an Associate license are stated on line 216-223, and include completing modules for classroom management and instruction, and special education law and instruction.
3. The requirements for an LEA specific license state on line 343 and 344 that content knowledge and pedagogical requirements will be established by the LEA governing board.

If the board's goal is to ensure that only highly qualified applicants become teachers that will not happen under this rule.

The requirements for both an Associate license and an LEA specific license are completely different from each other, and very different when compared to a candidate earning their certification through an accredited college or university.

Candidates from a college or university are immersed in our teaching standards. This education and training not only promotes metacognitive thinking skills in teachers, but gives them a deep understanding of pedagogy. This level of training cannot be mimic by modules or whatever the LEA governing board determines as sufficient.

Consequently, educators with an Associate license or an LEA specific license will be underprepared compared to an educator from a college or university. These teachers will be underprepared to modify lesson based on formative assessments, study student data and modify the pacing map, differentiate instruction for all learners, and effectively collaborate with their team. Most importantly, the lack of training these teachers have will negatively impact the students in their classroom for years.

As a parent, my daughter already had to experience an unqualified person teaching her 10<sup>th</sup> grade Honors English class. It was a lost year. As a Special Education Resource teacher, I have concerns about the lack of training these teachers will have and how that will impact students

who are just starting school. The earliest grades are where all the base concepts are taught in math and reading. For example, if students do not understand numbers in base ten, then multiplying and dividing by 10 or 100 and recognizing how that changes the value of a number will be difficult. If students do not learn phonemic awareness and decoding skills, they will struggle to read. If you have a classroom full of students who are not making progress, it will be difficult to identify students with disabilities, since they will not stand out from their classmates, and, unfortunately, how a student performs compared to their classroom peers is a significant data point when qualifying students for Special Education services.

The focus needs to be on funding schools and the students in those classrooms so that teachers have the support and supplies they need to best address the needs of their students. That is how you will reduce teacher turnover. I have had many colleagues tell me they left our Title One school because of the lack of resources and the increasing demands on their time that conflict with teaching the children.

Thank you.

Sincerely,

Linda Patrell-Kim

July 19, 2018  
Re: R277-301

My name is Kristi Jones, and I am writing as a concerned citizen who has spent her professional life in education. I want to extend my gratitude to the Board for holding a public hearing on R277-301 and for taking written comments.

My written comments focus on the potential for the new licensing structure to adversely affect the education of students with special needs.

I am grateful that the Board recognized the need for rigorous preparation for teachers of students with special needs. As a result, the Associate and LEA-Specific licenses cannot be utilized to teach special education.

However, a dangerous glitch still exists in the structure. According to the National Center for Education Statistics, approximately two-thirds of students with special needs spend 80% (or more) of their class time in general education classrooms (see links below). This is consistent with research demonstrating the benefits of mainstreaming students, with special needs, into more inclusive general education classrooms.

As such, two-thirds of students with special needs will have teachers for 80% of the day that the Board has recognized as not adequately prepared to work with students with special needs. Positive results of inclusive models of education depend on rigorously prepared general educators.

This glitch in the licensing structure pertains to students who are already qualified for special services. Next, I would like to address students whose needs have not yet been identified.

It typically falls on general educators to recognize when students might have special needs. After much research and intervention, general educators refer potential cases to special educators.

This process depends on general educators having expertise in recognizing when struggles may exist, documenting details, administering appropriate assessments, reaching out to parents, designing interventions, monitoring the progress of interventions, adjusting interventions as needed, and

potentially entering into the referral process with thoroughly documented case studies.

An undefined module on “Basic Special Education Law and Instruction” is required for the Associate License, not the LEA-Specific License. I worry that the module won’t require practical experiences that engage pre-service teachers with struggling students while the requisite professional skills are learned from veteran special educators and multiple university professors.

To address these structural glitches, while being mindful of the teacher shortage and student needs, my request is for the Associate and LEA-Specific licenses to be renamed as **Emergency Learners’ Permits**. These licenses need to require simultaneous enrollment in rigorous, well-mentored teacher preparation programs.

<https://www.washington.edu/doit/how-much-time-do-students-disabilities-spend-regular-classrooms>

[https://nces.ed.gov/programs/coe/indicator\\_cgg.asp](https://nces.ed.gov/programs/coe/indicator_cgg.asp)

Sincerely,  
Kristi Jones