

August 23, 2016

Dear Chair Wiger, Chair Erickson and members of the Teacher Licensure Study Group:

We appreciate your commitment to developing solutions to improve Minnesota's teacher-licensure system, which, according to a 2016 Office of the Legislative Auditor's (OLA) report, is "broken and needs significant changes."

The study group has identified two of the OLA's six "Key Recommendations" to focus on: restructuring the state's teacher-licensure system (pp. 76-78) and consolidating all teacher-licensure activities into one state entity (pp. 93-97).

#### Section 1: Comments on restructuring the state's teacher-licensure system

It is important to note that while the OLA recommended a tiered-licensure system as one *possible* approach to restructuring Minnesota's licensure system, they make it clear that even if the Legislature does *not* pursue tiered licensing, it should make a concerted effort to simplify and clarify the teacher-licensure system. "In the end," the OLA writes, "what is most important is having a more consistent and transparent system" (pp. 78).

The focus, therefore, must be primarily on developing a consistent and transparent system for laypersons, educators, and those issuing teaching licenses to understand. A tiered-licensure system must not be the ultimate goal, but rather a strategy to improve the convoluted system. We encourage this group to prevent establishing a tiered-licensure system that falls short of the OLA recommendations.

We support the OLA's Sample Tiered Teacher-Licensing System (Exhibit 4.4 on pp. 77) precisely because it is easy to understand, consistent, fair and objective. As the OLA writes:

A tiered system provides a transparent set of uniform standards... Compared with the current system, we think a tiered-licensing system could be more predictable... **A tiered-licensure system that wholly replaces the current system would eliminate the need for so many special permissions and exceptions.** (pp. 78, emphasis added)

While we applaud the Minnesota Board of Teaching (BoT) for their work on drafting a tiered-licensure system, we have concerns about their proposal because it does not address some of the key recommendations made by the OLA. Specifically:

- **The BoT draft is confusing.** The OLA proposes starting over entirely with a clean slate and implementing a singular checklist with five simple tiers. The BoT draft has four tiers, broken down into layers on top of our current, confusing licensure system.
- **The BoT draft treats out-of-state teachers differently.** The OLA includes the requirements for licensure for all Minnesota teachers into simple categories based on the licensure tiers. The

BoT draft creates unique “exceptions” for out-of-state teachers, creating different classifications for in-state and out-of-state teachers. This is the exact type of “exception” that the OLA has recommended eliminating.

- **The OLA explicitly recommended eliminating “special permissions” in our teacher-licensure system.** However, the BoT draft includes “Special Credential” licenses within each tier.
- **The BoT draft includes several terms which are not clearly defined and can open the door to subjective licensure determinations.** Terms such as “professional license from another state” and “evaluated field experience” must be more explicitly defined to ensure we are giving the draft full and fair consideration.
- **The OLA plan lists objective requirements.** Under the OLA’s plan, candidates have clear guidelines to move up the tiers. The BoT draft, on the other hand, includes requirements that must be approved through subjective analysis, such as submitting “Personal Growth Plans” to move to a Tier 4 license or submitting a “Reflective Statement of Improving Student Learning” to become a Master Teacher.
- **There are several instances where the BoT draft falls well out of line with current statute.** The BoT draft does not include the requirement, for any Tier, that candidates complete human relations preparation components. Additionally, the requirement that out-of-state candidates complete “12 weeks of evaluated field experience work” may be in direct contradiction to recent law changes allowing out-of-state candidates a license with more than two years of teaching experience regardless of whether that experience was evaluated.
- **The designation of a “Master Teacher” should be reserved for teachers with demonstrated effectiveness in the classroom.** We recommended that to earn this designation a teacher must receive the highest-possible summative evaluation designation in addition to other requirements.

## Section 2: Comments on consolidating all teacher-licensure activities into one state entity

We agree with the OLA that consolidating teacher-licensure responsibilities in one state entity would “improve transparency, reduce confusion among applicants and school administrators, and provide increased accountability for teacher-licensure decisions” (pp. 93). However, we disagree with the OLA’s suggestion that the “preferred option,” should be consolidating activities into BoT, and instead recommend that the legislature adopt the OLA’s second option: consolidating all activities into the Minnesota Department of Education (MDE).

We believe that the main advantage of this option is increasing accountability by streamlining the number of agencies involved and making better use of existing resources. Additionally:

- **We have significant concerns in giving increased responsibilities to the BoT.** The Board is an appointed all-volunteer board which meets just once per month. The BoT was recently found in contempt of court for failure to implement recently-passed laws (despite an injunction from state court requiring them to take action) and is months behind on statutorily-required rulemaking. Given its track record and lack of accountability, we worry about asking such a board to take on *all* teacher-licensure responsibilities.

- **We disagree with the OLA assessment that approving teacher-preparation programs is outside MDE’s core mission.** In fact, we believe that MDE may better know what our schools need from teacher prep programs than the Board, given the broad range of responsibilities MDE shares with our schools. By insulating teacher-prep programs in a separate Board we’re not only losing the opportunity to increase cooperation between our K-12 and post-secondary systems, but also the broader resources to use data to improve teacher licensure. In short, by maintaining a separate Board to approve prep programs, we lose the opportunity to focus our efforts and resources on ensuring Minnesota’s strategies for teacher licensure can meet 21st-century demands.
- **We agree with the OLA that teachers should have independent peer oversight on discipline issues and other conflicts.** However, as the OLA points out, the Legislature or MDE could establish an advisory body to handle complaints an educator discipline issues *only*, without making that body responsible for all licensing activities. This would allow our licensing agency to focus on their mission of creating a streamlined licensure process for all teacher candidates.

We stand ready to support this legislative study group in making the “significant changes” recommended by the OLA to fix our “broken” teacher-licensure system.

Thank you,

Educators 4 Excellence  
Center for School Change  
Hiawatha Academies  
MinnCAN  
Minnesota Business Partnership