Thank you for the opportunity to provide input to the Legislative Study Group on Educator Licensure.
We at the Commission advocate for communication access and equal opportunity for our constituencies, which includes improving outcomes for students who are deaf, deafblind and hard of hearing.

The shortage of teachers in the low incidence disability areas poses a real challenge. Legally schools are required to meet our students' needs, but cannot do so without trained personnel. We reviewed the proposals with an eye towards removing barriers that prevent schools from hiring teachers who were trained in other states and ensuring that our children are taught by quality, trained professionals.

We would be happy to answer any questions or provide any additional information that you may need. Thank you again for the thoughtful consideration that your team has put into this work.

## Comments about Governance:

## For all proposals:

At least one Special Education Director and/or Special Education Teacher should be included in the Review Board membership. This is the licensure area with the greatest shortage needs. Ideally this would include individuals from both the high incidence areas (Specific Learning Disability, Emotional Behavior Disorders, Developmental Delay, and Developmental Cognitive Delay - mild to moderate) and the low incidence areas (Blind/Visually Impaired, Deaf/Blind, Deaf/Hard of Hearing, Developmental Cognitive Delay - Severe Profound, Physical Impairment).

## Comments about Proposed Licensure Tiers

For all proposals:

- Would a Tiered license system change the Salary Schedules for the schools? Would this open contract negotiations again for each district? Would the tiered license cause local unions issues with the salary schedules?
- Eight credits in a subject matter area is not sufficient to teach in a subject. Aside from the foundational coursework required for all teaching licenses (including developmental psychology, and classroom management), the content course work for the thirteen special education categorical licenses typically add up to 15 credits without student teaching.

444 Lafayette Rd. N., St. Paul, MN 55155-3814
651-431-5961
mncdhh.info@state.mn.us
www.mn.gov/deaf-commission
Advocating for communication access and equal opportunity with the $20 \%$ of Minnesotans who are deaf, deafblind and hard of hearing.

- Caution should be taken in allowing Tier One licensure candidates multiple renewal opportunities. Most unlicensed teachers are in the high needs schools, which would seem to contradict The Every Student Succeed Act (ESSA), which specifically states that we need "attention to addressing inequities in access to effective, in field and experienced teachers".
- Tier one on all proposals allows for unqualified teachers in the classroom for periods that vary from 2 years to an unlimited amount of time. Allowing for multiple renewals provides no incentive for the teacher or the school district to get additional schooling or look for other options. At a minimum, teachers in this category should need to show progress toward getting a license.
- We appreciate that the Senate DFL and Senate GOP include a place for those who are licensed through the portfolio process. This is the only option for those who teach ASL as a world language, which is a potential employment opportunity for Deaf adults, who are disproportionately underemployed.


## GOP Senate Proposal

- For Probationary License, there is a requirement listed for a Master's Degree. This could prevent diverse populations from staying in the field. Many licensed teachers complete a full preparation program without completing the final courses to obtain an MED. They are still qualified teachers even without the final few expensive classes.
- To maintain a Master Teacher status, a teacher must consistently be rated as "Effective: by an administrator." This will add to the long list of responsibilities for the administrator while allowing for more potential conflicting perspectives of the definition of "effective".

