



Minnesota Board of Teaching

October 17, 2016

Legislative Study Group on Educator Licensure
C/O Senator Chuck Wiger and Rep. Sondra Erickson
75 Rev Dr. Martin Luther King Jr. Boulevard
St. Paul, MN 55155

Dear Senator Wiger, Representative Erickson, and members,

Per your request at the September 29, 2016, hearing, we write to you today to share feedback on behalf of the members of the Board of Teaching.

With regard to the issue of the governance of Minnesota teacher licensure, the Board steadfastly maintains that as with all like professions in our state, the policy making for and issuance of professional licenses should be carried out by members of the profession. The Office of the Legislative Auditor provided this recommendation as its preferred option for the consolidation of teacher licensing activities in the state and the Department of Education has publicly agreed with that recommendation.

"...the board has been the subject of significant criticism over the past several years. However, we think that some of this criticism has been unjust and that stakeholders have wrongly blamed BoT for activities that are not clearly its responsibility."

OLA Evaluation Report, pg. 93

The Board of Teaching members and our staff have been fully vested in finding solutions to the licensing concerns at the center of audit activities. It is vital that changes to governance over the profession not be based on anecdote or on partisan dialogue. Policy and implementation of teacher licensure needs to be within the jurisdiction of an independent professional educator standards board.

Vital to the oversight of all licensing policies is the need for maintenance of independent rulemaking authority. Statutes that conflict with board rules have come into being as the legislature has rightly attempted to resolve constituent concerns, though often in the absence of communication with the Board of Teaching. Independent rulemaking activities by the Board were not identified by the OLA report as the source of confusing and contradictory state policies and therefore removing the board's autonomy seems punitive. Board members are committed to ongoing communication and collaboration with the members of the Legislature to recodify the statutes and rules pertaining to teacher licensure.

The tiered licensure proposal presented to you in August was designed and edited with the input of multiple different stakeholder groups, representing a wide range of educational professions over more than 12 meetings (e.g. MSBA, MASA, EdMN, MinnCAN/Ed Allies, TFA, MACTE, BOSA and Hiawatha Academy). We are continuing these conversations and have made every effort to introduce a collaborative model for your consideration. We believe this shared model addresses many of the questions raised around the licensure proposals put forth by study group members.

The Board is encouraged that continued discussions reveal a foundation of general agreement across stakeholder groups. We believe that changes can be positively negotiated through broad participation in the rulemaking process and through legislative compromise.

Based on the wealth of stakeholder input and collaboration we've received, our shared model intentionally differs from those proposed by committee members in two distinct ways.

Teacher Preparation:

Teacher preparation should form the foundation of a teaching license for all educators serving MN children. We are concerned that the proposed models would allow individuals to teach in a classroom without any teacher preparation for an inordinate amount of time (at least 6 - 8 years). While shortage areas need to be addressed, we firmly believe that pedagogical instruction via any pathway is essential for supporting effective teaching. Our shared model provides districts a 2-year emergency stopgap for shortage areas, but requires the candidate to begin teacher preparation when choosing to continue serving within the profession. The range of positions held by unlicensed individuals should be limited to fields that do not have a licensure area or do not fit the traditional expectation for preparation through a four year program. The special credentialing process proposed in our shared model provides flexibility and seeks input from industry for those licensure areas that serve career and technical fields.

Teacher Evaluation:

Two of the proposed models from the study group base licensing determinations on the use of evaluation scores. Teacher development and evaluation models and practices currently vary widely between districts. Basing a licensing decision on these models would create an inconsistent system of promotion and a lack of parity in state licensing determinations. Local evaluation processes and procedures should be used to review licensed teachers within a school. We believe that teacher evaluation should remain consequential only within the local district and not impact a teacher's professional license.

We invite your calls, emails and requests for clarification at any time and appreciate your continued thoughtful consideration.

Sincerely,



John Bellingham
Chairman



Erin R. Doan
Executive Director